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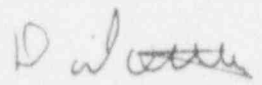
Secretary, U.S. Nuclear Regulatory Commission,
Washington, DC 20555
ATTN: Docketing and Service Branch

DEVELOPING RADIOLOGICAL CRITERIA FOR DECOMMISSIONING

I strongly support the 100 mrem limit recommended by international (ICRP) and national (NCRP) bodies for dose to the public from site decommissioning. I also recognize that a system must be in place to control doses from a variety of sources. The 15 mrem/y limit suggested in the proposed standard is very low, unjustified and inconsistent with existing NRC waste management rules (e.g., 10 CFR 61.41), which use 25 mrem/y as a limit. The Health Physics Society's (HPS), Scientific and Public Issues Committee, issued a position statement, "Radiation Standards for Site Cleanup and Restoration" in the Health Physics Newsletter of June 1993. They provided a recommended guidance for a dose "compliance screening level of 25 mrem in any one year." Adoption of this as the limit would be consistent with existing rules and be justifiable. The HPS rationale for recommending this is that it is "approximately the same magnitude as the geographic variability of doses from natural background; it is comparable to the difference in annual dose likely to be experienced by a person who moves from one location to another." I recommend that the 15 mrem/y dose "limit" be changed to 25 mrem/y and that the justification recommended by the HPS be added as basis.

Additionally, the 3 mrem/y goal justification is insufficient. The HPS also provided a recommended guidance that could be applied to the selection of a goal. They recommend an "assessment screening level of 5 mrem in any year (as) approximately the same magnitude as the temporal variability of the dose from natural background at a single location." Thus the 3 mrem/y goal seems arbitrary and unreasonably small. I recommend that the 3 mrem/y dose "goal" be changed to 5 mrem/y and that the justification recommended by the HPS be added as basis. Certainly the ALARA and cost benefit analysis process should be used in this "goal" area, otherwise it has no efficacy.

Sincerely,



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