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

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Dear Sirs;

In the recent public meeting held in Richland, Wa., regarding the cleanup of the N Springs area to prevent seepage of Strontium-90 to the Columbia, it was revealed that the EPA and the NRC are considering imposing very stringent cleanup standards at DOE sites. These standards, if implemented, would cost the U. S. economy billions of dollars in expenditures for negligible reductions of risk to the public.


The standards are specified in the draft, Developing Radiological Criteria for Decommissioning. One of the hard-number standards, perhaps the principal one being proposed, is to clean up property to a distinguishable 15 mrem/year total effective dose equivalent, and ALARA to 3 mrem.

I believe that the distinguishable 15 mrem/y limit is arbitrary and inconsistent with existing NRC waste management rules (e.g., 10 CFR 61.41), which use 25 mrem/y as a limit. It is claimed to be consistent in terms of risk, but no rationale or justification is provided.

The Health Physics Society (HPS) has provided 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."

The suggestion is that the distinguishable 15 mrem/y dose limit be changed to 25 mrem/y and that the justification recommended by the HPS be added as basis.

There are several other reasons for taking issue with the draft cleanup standard, but this one item has by far the greatest potential for being a waste of tax dollars.



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