



B&W FUEL COMPANY

An American Company with Worldwide Resources

March 8, 1994

DOCKETED

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Secretary
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

OFFICE OF SECRETARY
DOCKETING & COMPLIANCE
BRANCH

REFERENCE: Staff Draft Radiological Criteria for Decommissioning

Dear Sir:

B&W Fuel Company's Commercial Nuclear Fuel Plant is providing comments on the above referenced proposed rule. Generally speaking, BWFC recognizes the need for and encourages the NRC to establish decommissioning criteria. However, compliance with the proposed criteria would be difficult if not impossible. With this, it does not place the industry in a more favorable position than prior to establishment of the decommissioning criteria. The two major areas that BWFC wishes to comment on are the 15 mrem/yr criteria and the formation of the Site Specific Advisory Board. Both issues are addressed separately below:

15 mrem/yr Criteria

The 15 mrem/yr is not technically based, practical nor economically feasible. To demonstrate compliance to the 15 mrem/yr for a site, there would be great concern of the inaccuracy and uncertainty associated with the instrumentation and counting statistics to detect such low levels of contamination and to discriminate from background levels. The confirmation by NRC would also be difficult at such low levels.

The additional funds required to remediate a site to meet the 15 mrem/yr criteria versus a more reasonable criteria of 100 mrem/yr would be astronomical for very little benefit, if any, to the health and safety of the general public or to the environment.

It is inconsistent that when in operation, licensees are authorized to expose the general public to 100 mrem/yr but after operations cease this criteria is reduced by almost a factor of seven!

Site Specific Advisory Board

The formation of a Site Specific Advisory Board (SSAB) would not meet the intention of its definition. The SSAB is defined as a committee constituted by the licensee to provide advice to the licensee on decommissioning. It is questionable how a committee comprised of the general public and public interest groups could offer advice on decommissioning. The SSAB in all likelihood would deter and delay decommissioning efforts and would not offer positive direction as implied in the rule.

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The role of providing advice should not be placed in the hands of people that lack the knowledge and the experience of the nuclear industry. The creation of the SSAB transfers the responsibility of governing decommissioning from the NRC to a group of individuals that are not technically qualified to make such decisions. The ownership of regulating nuclear facilities should remain with the government agency.

The SSAB would promote inconsistency from site to site. What one SSAB determines to be acceptable may be quite different from a SSAB in another region.

Thank you for your consideration to these comments. If you should have any questions regarding our comments, please call me at (804) 386-5202.

Sincerely,

B&W FUEL COMPANY
Commercial Nuclear Fuel Plant

Kathryn S. Knapp

Kathryn S. Knapp,
Manager, Safety & Licensing