

March 9, 1994

NRC, Washington, D.C.

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(59FR4868)

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Gentlemen:

This comment is in response to your request for comments regarding your proposed Radiological Criteria for Decommissioning, <sup>OR NUREG/CR 6156</sup> (Draft).  
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Your philosophical approach of requiring cleanup to be accomplished to ALARA is commendable, however it appears that what is actually being called for is ALARA. The difference is the importance of reason as a consideration. With natural background radiation levels in this country varying between 300 and 1000 mr/y, with absolutely no correlation between high radiation environments and increased adverse health effects of any kind, it simple is unreasonable to insist that resources be expended chasing a cleanup target of 3 mr/y above background. Reasonable implies a prudent use of resources to achieve measurable goals. Since we can not measure any health benefit from reducing radiation below even fairly high backgrounds, we must conclude that cleanup efforts which result in achieving a level anywhere within the range of normal background levels is reasonable.

A specific Reasonable guideline suggestion would be to allow 10% over background in high radiation areas (1000 mr or more), increasing linearly to 100% over background in the lowest radiation zones. Additional cleanup beyond these targets would be an option, but not a requirement.

On page 19 of the Draft, the first sentence states, "The GEIS concludes that the individual dose is controlling." Does this mean that cleanup of a site with surrounding population density of 10 people per square mile must be as extensive as a site with a population density of 10,000 people per square mile. This is improper use of limited resources.

We should not be imposing costs which always end up coming out of the pockets of the consumer and taxpayer to be far more stringent than nature imposes on us in terms of risk.

The SSAB is to make technical recommendations to the licensee, yet the membership is primarily non-technical. This will drive the cleanup of the site into the political arena and result in solving non-technical and perceived problems.

Your responsibility as informed regulators includes both protection of the public health and the public good, by insuring that the benefits of nuclear technology are not lost because of arbitrary and unfounded regulations.

Sincerely,

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