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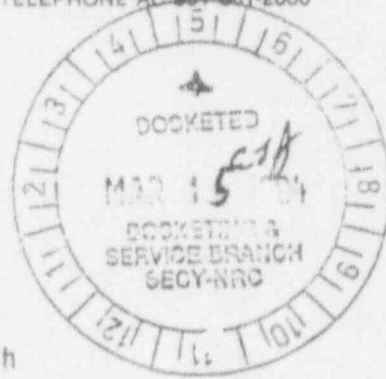
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March 14, 1994

Donald A. Cool, Chief
Radiation & Health Effects Branch
Division of Regulatory Applications
Office of Nuclear Regulatory Research
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

RE: Draft Radiological Criteria for Decommissioning

Dear Don,

The NRC has done an exceptional job of transforming the comments received in the workshops into a working document for consideration of the radiological criteria for decommissioning. The decisions appear to have been thoughtfully considered with rationales providing firm support for those decisions. I believe the "Goal" and "Limit" levels chosen are appropriate and should have wide support. I suspect that some industry people may consider them low, but the levels effectively address public and political concerns while probably being technically feasible in most cases. The potential of terminating a license with restrictions provides a method for addressing more difficult situations.

However, terminating a license with restrictions is the area where I have some concern, particularly with 4th condition's 100 mrem TEDE. I believe this level to be too high and would recommend some percentage of the 100 mrem, say 50%. The point is to have a somewhat wider margin of safety before the regulatory limit is met. This 50% level could be a level that requires action to begin to prevent or lessen the potential that the regulatory limit will be reached or exceeded.

Again, you are congratulated on developing a very useful document.

Sincerely,

Gretchen J. Dicus, Director
Division of Radiation Control & Emergency Management

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