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May 10, 1994

Mr. 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: Developing Radiological Criteria for Decommissioning

Dear Mr. Cool:

Please excuse my tardy response to your letter of January 27, 1994, same subject. I was out of commission due to an operation on my eye.

At any rate, as a participant in one of the seven workshops, I feel a responsibility to follow through. First, I would like to express my appreciation for an obviously heroic effort to develop a standard which is intended to reflect the views of many interested parties and agencies.

My comments are restricted to the 3 mrem TEDE per year goal. The typical project that my company deals with in radiological remediation permits the achievement of reaching a level indistinguishable from background. Currently, the usual criteria of 5 μrem per hour above background permits a working range above background even when considering the normal variation in a particular area's background. For example, a decontamination program we recently completed at a university reflected an area background that varied between 7 and 10 μrem per hour. Therefore, even the most conservative interpretation of background left some working room. That is, 5 μrem per hour above 7 μrem per hour results in a working band of 2 μrem per hour over the highest background reading. That's tight but it is manageable. The 3 rem per year goal will equate to 1 1/2 μrem per hour above background by the logic of 2,000 hours exposure per year. But how are we to evaluate unrestricted release? In the university example, the only workable interpretation would be to add the allowable value over the maximum value of background (10 μrem per hour). Will this be the guidance furnished by the Commission? I doubt it will be given in that simplistic a sense. I am sure you appreciate the problem though. Even using the average background value as the base (8 1/2 μrem per hour in the example), a remediation program could very conceivably generate large quantities of non-contaminated materials which had to be treated as low-level radioactive waste when compared to the goal (10 μrem per hour in the example).

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I imagine this point has been raised by a myriad number of reviewers but, though tardy, I was still compelled to respond.

I wish you the very best in achieving the final rulemaking. I sincerely hope you provide a workable, technical solution. Otherwise, I foresee legalistic solutions where remedial dollars will be spent on legal fees and actual cleanup activity, i.e. real environmental restoration, will decrease.

Sincerely,

W J Manion

William J. Manion
President

WJM:kg

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