



ER 85/254

United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

PR-30, 40, 50, 51, 70, 72
(50 FR 5600) (2)

APR 23 1985 DOCKETED
USNRC

Mr. Samuel J. Chilk
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

85 APR 25 11:18

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Dear Mr. Chilk:

The Department of the Interior has reviewed the proposed rule for Decommissioning Criteria for Nuclear Facilities as noted in the Federal Register on February 11, 1985.

The proposed reduction in environmental review requirements related to decommissioning of nuclear facilities as noted on page 5603 could replace a relatively stringent and in-depth evaluation of potential environmental impacts with a brief and less well documented assessment of possible effects on the human environment. In the past, environmental impacts and related documents prepared for the construction and operating license stages have generally touched very lightly on specific decommissioning impacts, postponing the detailed analysis of specific effects until later in the life of a given facility. Decommissioning would be expected to occur usually at the end of facility life—generally at least 20 to 25 years and often 30 or more years following issuance of an environmental impact statement for construction of a plant. During periods of so many years, decommissioning techniques and alternatives would most probably be modified from those presented in an environmental impact statement for the construction permit or operating license stages. We suggest that the proposed amendments to the regulations should retain the requirement of an environmental impact statement for decommissioning nuclear facilities but permit use of reference to the generic environmental impact statement on decommissioning, when careful study and/or testing at a given nuclear facility has demonstrated that the generic approach is adequate. Review by agencies having jurisdiction and special expertise could then be expedited.

We hope these comments will be helpful to you.

Sincerely,

8505010040 850423
PDR PR
30 50FR5600 PDR

Bruce Blanchard
Bruce Blanchard, Director
Environmental Project Review

DS10
add: Keith G. Steyer-60355
Catherine R. Mahson-113055

1/0

APR 29 1985
Acknowledged by card.....

pa