



HEALTH PHYSICS SOCIETY

Specialists in Radiation Safety

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June 25, 1997

The Honorable Shirley A Jackson
Chairman
U.S. Nuclear Regulatory Commission
Mailstop 16G15
Washington, DC 20555-0001

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PROPOSED RULE PR 20, et al.
(59FR43200)

Dear Chairman Jackson

On behalf of the 6,500 members of the Health Physics Society, I am writing to you and your fellow Commissioners with regard to the recent actions taken by the Commission to establish standards for the decontamination and decommissioning of NRC-licensed sites. As you may know, the Health Physics Society is a professional organization of scientists, educators, engineers, and operational health physicists dedicated to the development, dissemination, and application of scientific knowledge of, and the practical means for, radiation protection. Our objective is the protection of people and the environment from unnecessary radiation exposure.

In this regard, we would like to commend you for the decisive action which the Commission has taken, after many long years of public debate and discussion, in establishing a comprehensive and scientifically-based regulatory regime for the decontamination and decommissioning of NRC-regulated sites.

The approach endorsed by the Commission reflects a sound understanding, in our view, of the fundamental health physics principles upon which regulatory action of this nature should be based. It is fully compatible with the views of the National Council on Radiation Protection and Measurements, as well as the International Commission on Radiological Protection. We particularly commend you for resisting what we consider to be unsound scientific approaches, based largely on emotional arguments on the dangers of radiation.

Perhaps most importantly, the establishment by the Commission of this standard now provides long-awaited criteria for the decontamination and decommissioning of NRC-licensed sites once activities at those sites are concluded, thereby addressing the uncertainty which has existed over many years about the cleanup standard which would be applied by the federal government. In so doing, you will facilitate the timely, cost-effective cleanup of these sites when the time comes, rather than perpetuate a situation where licensees interested in moving forward with cleanup of their sites would find a lack of clarity about who will be establishing the cleanup standard and what that cleanup standard might be.

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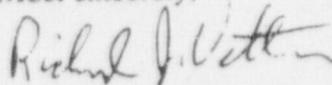
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Once gain, we commend you for the sound and decisive action that the Commission has taken. We look forward to continuing a productive relationship with your Staff on this issue, as the Commission moves forward with the implementation of this important standard.

Most sincerely,



Richard J. Vetter, Ph.D.

cc The Honorable Kenneth C. Rogers
The Honorable Edward McGaffigan, Jr.
The Honorable Nils J. Diaz
The Honorable Greta J. Dicus