

# PUBLIC SUBMISSION

SUNSI Review Complete  
Template = ADM-013  
E-RIDS=ADM-03  
ADD: Cynthia Barr, Mary  
Neely

COMMENT (5)  
PUBLICATION DATE:  
1/22/2021  
CITATION 86 FR 6683

<b>As of:</b> 4/14/21 7:03 AM <b>Received:</b> April 08, 2021 <b>Status:</b> Pending_Post <b>Tracking No.</b> kn9-0iix-t459 <b>Comments Due:</b> April 08, 2021 <b>Submission Type:</b> Web
--

**Docket:** NRC-2020-0192

Consolidated Decommissioning Guidance, Characterization, Survey, and Determination of Radiological Criteria

**Comment On:** NRC-2020-0192-0001

Consolidated Decommissioning Guidance, Characterization, Survey, and Determination of Radiological Criteria

**Document:** NRC-2020-0192-DRAFT-0008

Comment on FR Doc # 2020-26876

---

## Submitter Information

**Email:** lee.gordon@nyserda.ny.gov

**Government Agency Type:** State

**Government Agency:** New York State Energy Research and Development Authority

---

## General Comment

See attached file for comments by the New York State Energy Research and Development Authority.

---

## Attachments

21amd010.lmg - Comment Submittal on NUREG 1757



**ANDREW M. CUOMO**  
Governor

**RICHARD L. KAUFFMAN**  
Chair

**DOREEN M. HARRIS**  
President and CEO

April 8, 2021

To Whom It May Concern:

**SUBJECT:** New York State Energy Research and Development Authority Comments on NUREG 1757 Consolidated Decommissioning Guidance, Volume 2, Revision 2, Docket ID NRC-2020-0192

The New York State Energy Research and Development Authority (NYSERDA), the licensee under License CSF-1 for the Western New York Nuclear Service Center (Center), appreciates the opportunity to provide feedback on this important revision to NUREG 1757. NYSERDA is using NUREG-1757 for the identification and evaluation of decommissioning options for portions of the Center in conjunction with the United States Department of Energy (DOE), as DOE works to complete the decommissioning of other parts of the Center through the West Valley Demonstration Project. To that end, NYSERDA offers the following comments:

- NYSERDA suggests adding clarifying language to Appendix G (see Page G-4, first bullet). Specifically, we propose that in addition to the dose associated with the building structure, system, or component residual radioactivity, the potential dose *from residual radioactivity in environmental media* should be included in the total dose apportionment calculations to determine if the potential dose from offsite use exposure scenarios exceeds a few hundredths of a millisievert (i.e., few millirem per year).
- With regard to Page G-7, Section G.3.1, we suggest additional language be included here to identify the specific method(s) that the Nuclear Regulatory Commission (NRC) proposes be used to identify the subsurface hard-to-detect radionuclides during a radiological survey or through modeling. This section also identifies a Contamination Concern Map (CCM) that supports the conceptual model for a licensed site. NYSERDA is seeking clarity on whether the CCM is submitted by the licensee as part of the Multi-Agency Radiological Survey and Site Investigation Manual (MARSSIM) process, and whether the CCM is reviewed and approved by the NRC.

**New York State Energy Research and Development Authority**

**Albany**

17 Columbia Circle, Albany, NY 12203-6399  
(P) 1-866-NYSERDA | (F) 518-862-1091  
nyserdera.ny.gov | info@nyserdera.ny.gov

**Buffalo**

726 Exchange Street  
Suite 821  
Buffalo, NY  
14210-1484  
(P) 716-842-1522  
(F) 716-842-0156

**New York City**

1359 Broadway  
19th Floor  
New York, NY  
10018-7842  
(P) 212-971-5342  
(F) 518-862-1091

**West Valley Site**

**Management Program**  
9030-B Route 219  
West Valley, NY  
14171-9500  
(P) 716-942-9960  
(F) 716-942-9961

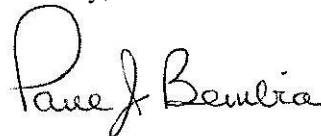
April 8, 2021

- Regarding Page G-25, Section G.7, NYSERDA suggests stream sediments be included in the discussion of residual radioactivity as well as in the process for determining cleanup levels used in the decision criteria for survey design and model integration. Further, NYSERDA suggests additional guidance be provided for determining radioactive contamination levels associated with stream sediment, as MARSSIM does not discuss this environmental media.
- NYSERDA is unable to ascertain the basis for Footnote #6 on Page I-26, which states that “the licensee may eliminate a residential scenario, as construction of a residence in the area of active erosion would not be realistic, given its proximity to surface water and uneven topography.” Throughout the northeast region and within the local West Valley community, there are myriad examples of residences built and maintained in areas of active erosion. Often, residences are constructed next to actively eroding features, such as deep gullies and eroding stream channels. It is often the proximity to surface water and the views afforded by uneven topography that homeowners find attractive. As such, it does not seem reasonable to preclude a residential scenario for sites/facilities with erosion features.
- As written on Page N-10, Section N.3.2.2, the NRC directs licensees to account only for those regulatory costs avoided through unrestricted release, and therefore not to account for regulatory costs associated with a restricted-release scenario. Viewing avoided regulatory costs as a benefit makes sense; however, on a complex site that contains long-lived radionuclides, we suggest the NRC include guidance for licensees to account for regulatory costs on restricted sites that may span decades or even centuries.

NYSERDA appreciates the NRC’s work to make NUREG-1757 a more useful guidance document for licensees. We believe this opportunity to provide technical feedback will be helpful in this process.

If you have any questions or need additional information on these comments, please contact Lee Gordon of my staff at (716) 942-9960 extension 4963.

Sincerely,

A handwritten signature in black ink that reads "Paul J. Bembia". The signature is written in a cursive style with a large initial "P".

Paul J. Bembia, Director  
West Valley Site Management Program

PJB/lmg