

USEcology

an American Ecology company

November 12, 1999

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Rulemaking and Adjudication's Staff

DOCKET NUMBER
PROPOSED RULE PR 20
(64FR35090)

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US Ecology Inc. welcomes the opportunity to comment on the U.S. Nuclear Regulatory Commission's (NRC) issues paper on Release of Solid Materials at Licensed Facilities (FR: June 30, 1999, Vol.64, No. 125).

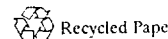
US Ecology offers no opinion, at this time, as to the specific regulatory approach that NRC should pursue in addressing release of solid materials at licensed facilities (Clearance Initiative). Whatever approach is developed, however, should be applied uniformly to all licensees.

We urge, also, that NRC work closely with agreement states which have established programs relative to this issue. Certain agreement states have already implemented well functioning and scientifically sound regulatory processes addressing release or exemption of certain contaminated radioactive solids. We believe that NRC should pursue its own initiative without impeding these state programs in any way. Further, we believe NRC should avail itself of the opportunity to adopt relevant aspects of these state initiatives into its own.

We concur with NRC that coordination with other federal agencies, such as U.S. Environmental Protection Agency (EPA) and U.S. Department of Energy (DOE), is essential. As noted in NRC's issues paper, both EPA and DOE are pursuing initiatives related to NRC's clearance initiative. Agreement among cognizant federal agencies regarding approaches and criteria for deregulation of certain slightly contaminated waste streams would enhance public credibility and minimize confusion within the regulated community.

In its Clearance Initiative issues paper, NRC raises a number of issues and posits numerous questions related to these issues. US Ecology assumes, given the enhanced participatory process that is being employed in this instance, that there will be a wide range of responses to these questions from various stakeholders.

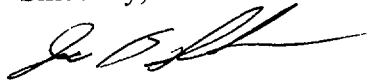
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When NRC selects a particular direction on the clearance issue, US Ecology requests the opportunity to provide comments responsive to specific proposed approaches. We look forward to that future opportunity and thank you for inviting our views at this preliminary stage.

Sincerely,



James A. Shaffner, P.E.
Manager of Engineering

Cc: J. Lemley, American Ecology, Inc., Boise, ID