

January 3, 2001

MEMORANDUM TO: Frederick C. Combs, Deputy Director
Office of State and Tribal Programs

FROM: Larry W. Camper, Chief **/RA/**
Decommissioning Branch, NMSS/DWM

SUBJECT: REVIEW OF SUGGESTED STATE REGULATIONS FOR THE
CONTROL OF RADIATION REQUIREMENTS FOR FINANCIAL
ASSURANCE

We reviewed the draft copy of Suggested State Regulations for the Control of Radiation (SSRCR), "Requirements for Financial Assurance."

We believe that portions of the SSRCR should be revised to correlate with the structure of NRC regulations. In particular, it appears that the SSRCR attempts to combine uranium milling licensees with other types of materials licensees. Because of the unique statutory requirements applicable to uranium mills under the Uranium Mill Tailings Radiation Control Act (UMTRCA), we suggest that the SSRCR should more fully distinguish the requirements for the uranium mills from other materials licensees. In addition, some parts of the draft appear to conflict with each other regarding the lower limit above which financial assurance is required. Lastly, the SSRCR would allow an exemption for noble gases in sealed sources that appears to be less restrictive than NRC regulations.

Our comments are attached. Please contact Mr. Fredrichs of my staff if you have questions or comments.

Attachment: Comments

Contact: Thomas L. Fredrichs, NMSS/DWM/DCB
(301) 415-5971

DOC ID: HKENW05DCB-050.mxd, Job: 050, Date: 11/15/2015, 11:53:53 AM, User: JEFFREY, Path: \\J:\Projects\050\050.mxd

(301) 415-5971

AN: ML-013510476

Comment.wpd

G:\Program Files\Adobe\Acrobat 4.0\PDF Output\0 SSR CR ASSOCIATED COMPANY LIMITED\SSR

OFFICIAL RECORD COPY

DCB r/f

January 3, 2002

Template No.: NMSS-010

NMSS r/f

J.Piccone

L.Camper

DATE	NAME OF OFFICIAL	RECORDS
12/7/91	Fred	
OFFICIAL RECORDS		
12/31/01	Chris	
1/8/02	Carol	
/	/	DCB

financial institu
Therefore, we

Federal of Stat
constitutes an
This section re

Section S.6.b.

possession of radioac
instrument required by
The licensee shall pro

Probably, the l.

radioactive materials,
by the Part and appro
“A signed executed or

Apparently a ty

Sec. S.4.f, Fin

assurance amo
S should be re
requirements c
Therefore, we

uranium mill ta
requires \$250,
assurance than
Long-Term Ca
Financial Assu
We have not p

led to certain a
have some uni
procedures for
and 10 of Appe
1978. Regulat
regulating the r
assurance req
thorium milling
material milling
The suggested

Section 10, L
Sections S.1 a

Comments on Sugges

Attachment 1

be equivalent to
suggested Part
Therefore, we

quantity listed
possess noble
example, 10 CF
licensee may p
However, there
NRC regulation
requirements b
daughter produ
Persons autho

Section S.11.1

threshold for re
Therefore, we

financial assur
license authori
decommission
than 10 mCi of
suggested Part
However, this c

source materia
microcuries ea
suggested Part
C.4, Appendix
Section S.11.a

Section S.11.a