



State of New Jersey

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Chief, Rules review and Directives Branch
Mail Stop: T6-D59
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
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Dear Sir or Madaam:

The New Jersey Department of Environmental Protection's Radiation Protection Program is submitting the following comments on the September 2002 draft for comment of NUREG-1757, Vol. 2, *Consolidated NMSS Decommissioning Guidance, Characterization, Survey, and Determination of Radiological Criteria*.

1. Page 4-11 states: "Licensees should note that if they elect to dispose of buildings and structures rather than leave the buildings and structures in place (for unrestricted release), the LTR does not apply. Rather, building and structure deconstruction and dismantlement materials can be released from the site in accordance with existing license conditions." If the license does not have specific release criteria, what guidance should be used? Does the regulatory agency need to audit this release? B. Ullrich, Region I on 11/13/02 at a NJCHPS meeting said that existing license conditions are okay for items that are not "bolted down". Parts of a building are more than "bolted down". Page G-1 also describes walls and floors as non-equipment. Please clarify.
2. On page A-10, it is stated: "There is no specific recommendation for the MDCscan, but the MDCscan will determine the number of samples needed,..." This statement conflicts with the recommended MDCscan of 10-50% of the DCGL on page B-1 of this volume and page 6-7 of MARSSIM. Additionally, page E-4, of this volume, states that the survey instrument MDC should be less than the DCGL. The statement

on page A-10 is clear for class 1 areas, but may imply to licensees that the MDCscan for class 2 and 3 areas may be above the DCGL.

3. On page D-4 is stated: "Propagating the total uncertainty yields: 57 disintegrations." We calculate 53. Please respond with the calculation.
4. On page E-7, equation E-4 is in the wrong place in the text.
5. Page G-2 of Appendix G states that "...the dose from residual radioactivity in sewer pipes should be calculated using site-specific scenario." Is there guidance for site specific scenarios to include exposure during removal and after disposal of the piping? If removal is assumed, is it assumed that the "inaccessible surface" must meet accessible surface limits? Or would procedures, such as grouting, change the dose assessment parameters sufficiently? Would a geometry of rubble be acceptable assuming the piping was removed?
6. Page G-3 of Appendix G states: "It may also be necessary to take into consideration building renovation that would disturb the piping." Does one assume renovation in all cases except deed restriction?

Thank you for giving us the opportunity to comment on this NUREG. Please contact Jenny Goodman at (609) 984-5498, if you have any questions.

Sincerely,

Jill Lipoti, Ph.D., Assistant Director
Radiation Protection Programs