



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

August 26, 2019

Kathleen Cuzzolino
Project Manager
U.S. Army Corps of Engineers – New York District
26 Federal Plaza
New York, NY 10278

**SUBJECT: COMMENTS REGARDING NATIONAL PARK SERVICE DRAFT FINAL
ENVIRONMENTAL INVESTIGATION REPORT FOR GREAT KILLS PARK
OPERABLE UNIT 2, GATEWAY NATIONAL RECREATION AREA, NEW YORK**

Dear Ms. Cuzzolino:

I am writing to provide you with the U.S. Nuclear Regulatory Commission staff's (NRC's) comments regarding the National Park Service's (NPS) *Draft Final Environmental Investigation Report for Great Kills Park Operable Unit 2, Gateway National Recreation Area, New York* (hereafter the draft Environmental Investigation Report; available in NRC's Agencywide Documents Access and Management System (ADAMS) at Accession Number ML19196A103). The NRC's role at Great Kills Park is defined within the Memorandum of Understanding (MOU) between the NRC and NPS, dated August 21, 2018 (ADAMS Accession Number ML19198A281). Under the MOU, the NRC staff determines appropriate monitoring activities, which include document and data reviews, to ensure that NPS's remedy at GKP meets the dose criterion in Title 10, *Code of Federal Regulations* (CFR) 20.1402 (i.e., 25 millirem per year [0.25 millisievert per year (mSv/yr)]) for sites or portions of the sites that will be released for unrestricted use or is consistent with the requirements in 10 CFR 20.1403(b) for sites or portions of the sites that will be released for restricted use. The NPS's responsibility for meeting any other relevant federal and/or State regulatory requirements is independent of this NRC review.

NRC staff and its contractor, Oak Ridge Associated Universities, reviewed the draft Environmental Investigation Report and developed the enclosed comments with the purpose of helping NPS to eventually demonstrate that there is reasonable assurance that residual radioactivity in Operable Unit 2 at Great Kills Park would conform to the 0.25 mSv/yr dose criterion. The comments are provided as part of NRC's monitoring to assist in finalizing the document and planning future phases toward that purpose; a response letter to the NRC staff is not necessary. The NRC staff will not be preparing a monitoring report on the draft Environmental Investigation Report since it was an intermediate data collection and reporting effort intended to prepare for future phases within Operable Unit 2.

In accordance with 10 CFR 2.790 of the NRC's Rules of Practice for Domestic Licensing Proceedings and Issuance of Orders, a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's ADAMS. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

I will contact you in the near future to answer any questions you may have regarding these comments, but if you have any immediate questions, please contact me at (301) 415-0140 or at christopher.grossman@nrc.gov.

Sincerely,

//RA//

Christopher Grossman, Project Manager
Low-level Waste and Other Projects Branch
Division of Decommissioning, Uranium Recovery
and Waste Programs
Office of Nuclear Material Safety
and Safeguards

Docket No.: 03038873

Enclosure: Comments

REGISTERED LETTER – RETURN RECEIPT REQUESTED

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