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Conference of Radiation Control Program Directors, Inc.

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January 6, 1995

Richard L. Bangart, Director
Office of State Programs
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Bangart:

The Conference of Radiation Control Program Directors, Inc. (CRCPD) would like to express our gratitude that you were able to postpone the proposed cutback in the environmental radiological verification monitoring program in the environs of major nuclear facilities. We are pleased that this cutback was postponed from the planned effective date of January 1, 1995, and that the Nuclear Regulatory Commission (NRC) will be putting the proposal in the *Federal Register* to allow public input. We will be submitting comments at the appropriate time. However, we want you to know that we consider the cutback of this program to be an example of how the Federal government's withdrawal of services puts pressure on states to take over these services, often without adequate funding. This can burden other aspects of state programs since state funding is finite.

Currently, many states are the recipients of annual grants for the purpose of providing independent analyses of environmental samples taken around nuclear power facilities. These samples include air, water, milk, fish, food products, sediment, and thermoluminescent detectors. The states have been performing these analyses for the past 15 years.

While we understand that NRC is under severe budget constraints, and is looking at ways to cut back on any services that may be considered duplicative, we think there are excellent scientific and policy reasons to continue the environmental monitoring program.

To give just one example of how this data has proved to be useful, Oyster Creek Nuclear Power Station in New Jersey has proposed to construct an independent spent fuel storage facility on its property since it will run out of space in its spent fuel pool at the next refueling. Since permits were required by the local township, several public hearings were held on the subject, and there was concern expressed by some citizens about radioactivity being released from the plant. They requested the environmental monitoring data from the state as a verification of the data that was supplied to them from the facility. The state program was able to give them 15 years of data. While the whole debate about the spent fuel storage facility was rather emotionally charged, the presentation of factual independent data served to ground the assessments of all individuals involved, giving them a common base of understanding from which to proceed.

It is our understanding that NRC might wish to continue the thermoluminescent detector monitoring program, even in the absence of the environmental sampling. The CRCPD members

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would be happy to participate in a discussion of the types of data that have proved to be valuable. Since CRCPD includes non-agreement as well as agreement states and both are recipients of NRC grants, we are the appropriate organization to participate in this discussion. The CRCPD members also have a considerable degree of expertise in radiation risk assessment and risk communication, which should be paramount to the discussion.

If NRC can no longer provide funding for these activities, states will need to find alternate funding for the program. We may be able to negotiate our own agreements with utilities, or we may have to request additional appropriations from the state legislature. Both avenues require significant lead time, so we appreciate the additional notice that NRC is supplying the states of their intention to withdraw funding.

Please accept this letter as the opening of a dialogue as you make decisions on any proposed cutback on the radiological verification monitoring program around nuclear facilities. As a policy matter, this monitoring verification information is valuable to people living in the environs of these facilities, and as a practical matter, a precipitous cutback is difficult to manage in state government. If you wish to speak with us about any of these points, please feel free to call.

Sincerely,



Roland Fletcher
CRCPD Chairman

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cc. CRCPD Board of Directors