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May 29, 1985

DOCKETED  
USNRC

Secretary, U.S. Nuclear  
Regulatory Commission  
Washington, D.C. 20555

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Attention: Docketing and Service Branch

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Dear Sir/Madam:

This is in response to your request for comments regarding the "Decommissioning Criteria for Nuclear Facilities" which appeared in the Federal Register Vol. 50, No. 28, February 11, 1985.

## 1) Part 30.36 (a) (1) (ii):

Removal of contamination to the "extent practicable" does not adequately quantify the extent to which decontamination should be performed. A limit or standard should be delineated (e.g., 100 dpm/100 cm<sup>2</sup>) below which further decontamination is not necessary. Furthermore, the basis for these limits and the health impacts on occupational workers and the public should be assessed.

## 2) Part 30.36 (c) (2) (i) (A), (B), &amp; (C):

The term "significantly greater" with respect to surface contamination, radiation levels, airborne concentrations and environmental releases needs to be properly quantified for each of these subject areas. Such limits or ranges are necessary to insure uniform clean-up and/or decommissioning activities at all licensees in all States.

## 3) Part 40.42 (c) (1) (ii):

See Part 30.36 (a) (1) (ii) comments.

## 4) Part 40.42 (a) (2) (i) (A), (B), &amp; (C):

See Part 30.36 (c) (2) (i) (A), (B), & (C) comments.

## 5) Part 50.82 (b) (2):

The requirement for a "description of the controls and limits on procedures and equipment to protect...public health and safety" should be expanded to include recommended (or required) limits and controls for residual radioactivity levels, waste management procedures, etc. The assumptions

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and modeling used to generate these standards should be identified, as should the occupational, environmental, and public health risks associated with the use of these standards. Such information needs to be delineated for each of the decommissioning alternatives.

In addition to the inclusion of these standards into the description requirements, mention should be made of the need to assess the impacts and risks associated with the radioactive wastes generated in the decommissioning process. These impacts and risks should also be addressed for accidents related to decommissioning.

Thank you for the opportunity to comment on these proposed amendments.

Sincerely,

*Raymond W. Thron*

Raymond W. Thron, Ph.D., P.E., Director  
Division of Environmental Health

RWT/BD/yw