



Minnesota  
Environmental Quality Board

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St. Paul, Minnesota 55101  
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DOCKET NUMBER

PROPOSED RULE

PR-30, 40, 50 et al.  
(50 FR 5600) (135)

DOCKETED  
USNRC

'85 AUG -1 A11:47

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

July 30, 1985

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

Ref: Comment on NRC proposed rules for decommissioning nuclear  
Facilities. 50 FR 5600

Dear Secretary:

The enclosed are the remainder of Minnesota's comments on the above  
referenced rules. Comments by the Department of Public Service and  
the Department of Health have been sent to you previously. Enclosed  
are comments by the Pollution Control Agency.

Sincerely,

John P. Hynes  
Power Plant Siting Staff

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AUG - 1 1985

DEPARTMENT

Pollution Control Agency

## Office Memorandum

TO: John Hynes  
State Planning Agency

DATE: June 14, 1985

FROM: *Deborah R. Pile*  
Deborah R. Pile, Director  
Office of Planning and Review

PHONE: 6-7799

SUBJECT: Proposed NRC Decommissioning Criteria for Nuclear Facilities

My staff has completed its review of the subject proposed rules and the draft comments from the Nuclear Information and Resource Service (NIRS). Generally, we find that we can concur with the NIRS draft comments. We also add the following observations:

1. The proposed reduction of environmental review requirements relating to decommissioning is unacceptable. The NRC proposes to replace the presently required environmental impact statement (EIS) with an environmental assessment. While an EIS has generally been prepared at the time of licensing of plants, licensing EIS's rarely contain more than a cursory discussion of decommissioning, and in any case would be outdated by the time the licensed facility is due for decommissioning. The draft generic EIS and any final generic EIS are not sufficient to address the site specific environmental impacts associated with the decommissioning of any specific facility. An EIS must be prepared for each facility at the time that decommissioning is anticipated.

2. The NRC proposes to address the development of appropriate residual radioactivity levels in other rulemaking. These rules apparently are expected to change very little from existing guidelines. We note that if the maximum residual radioactivity levels are reduced, the cost of decommissioning would be expected to increase accordingly. It would, therefore, appear appropriate to link the development of decommissioning criteria with the determination of residual radioactivity limits.

3. It is also emphasized that the determination of residual radioactivity limits must be accomplished in a timely fashion. The development of decommissioning plans and environmental review documents will necessarily be dependent upon availability of residual radioactivity limits, which will influence the selection of decommissioning strategies, environmental impacts, and financial expenses.