



THE COMMONWEALTH OF MASSACHUSETTS

LOW-LEVEL RADIOACTIVE WASTE MANAGEMENT BOARD

100 CAMBRIDGE STREET, ROOM 903

BOSTON, MASSACHUSETTS 02202

TELEPHONE: (617) 727-6018 FAX: (617) 727-6064

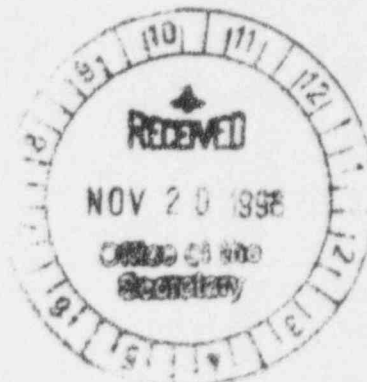
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WILLIAM F. WELD
GOVERNOR

JOSEPH P. RING, Ph.D., CHP
CHAIRMAN

CAROL C. AMICK
EXECUTIVE DIRECTOR



FAX COVER SHEET

PAGE 1 OF 3

DATE: 11/20/96

FROM: Joseph Ring

TO: Mr. John C. Hoyer

RE: COMMENTS ON LLW STRATEGIC ASSESSMENT
& REBASING.

COMMENTS: _____

Please contact the office of the Low-Level Radioactive Waste Management Board at (617) 727-6018, if there is a problem in the receipt of this material.

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November 20, 1996

Mr. John C. Hoyle
Secretary of the Commission
U.S. Nuclear Regulatory Commission
ATTN: Chief of Docketing and Services Branch
Washington, DC 20555-0001

Subject: Comments on NRC Strategic Assessment of Regulatory Activities

Dear Mr. Hoyle:

The purpose of this letter is to provide comments in support of Option 2 of the "Strategic Issue Assessment Paper" for rebaselining of NRC's regulatory activities associated with low-level radioactive waste (LLRW). The Commonwealth of Massachusetts Low-Level Radioactive Waste Management Board (Management Board) appreciates the opportunity to provide comments on this important initiative.

The Management Board believes that Option 2 as outlined in DSI 5 reflects the appropriate role for NRC in LLRW management. NRC's mandate to ensure public health and safety related to the use of radioactive materials makes it important that the NRC assume a strong regulatory role in management of LLRW. Although many states, as Agreement States, share the role of regulating the use of radioactive materials and the management of LLRW, NRC provides a vital function in developing detailed technical bases for federal and state regulations and in ensuring uniform implementation of those regulations consistent with the technical bases from which they are derived.

The Management Board also views the NRC's role in advancing the technology and regulation of LLRW management and disposal as important to the entire national LLRW program. NRC should assume a strong and aggressive role in supporting the development of regulations, revision of regulations, and improvement of LLRW treatment and disposal technologies in fulfilling its mandate to ensure public health and safety. For example, NRC should continue to sponsor research on alternative disposal technologies and then

follow through as necessary with appropriate revisions to 10 CFR Part 61, other relevant regulations, and supporting guidance documents. The information, standards, and guidance developed through such programs is of interest throughout the country and can most efficiently be performed by one agency.

For these reasons, the Management Board strongly urges the Commission to adopt Option 2: assume a strong regulatory role in the national LLRW program. Thank you for the opportunity to comment on the NRC's strategic assessment and rebaselining effort.

Sincerely,

A handwritten signature in dark ink, appearing to read 'J. P. Ring', is written over the typed name.

Joseph P. Ring, Ph.D., CHP
Chairman