

# PUBLIC SUBMISSION

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**Docket:** NRC-2020-0192

Consolidated Decommissioning Guidance, Characterization, Survey, and Determination of Radiological Criteria

**Comment On:** NRC-2020-0192-0001

Consolidated Decommissioning Guidance, Characterization, Survey, and Determination of Radiological Criteria

**Document:** NRC-2020-0192-DRAFT-0010

Comment on FR Doc # 2020-26876

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## Submitter Information

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**Organization:** Conference of Radiation Control Program Directors

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## General Comment

CRCPD's E-24 Committee on D&D - Comments on NUREG-1757, Vol 2, Rev 2 (see attached file)

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## Attachments

CRCPD E-24 Comments on Docket No NRC-2020-0192-0001

**CRCPD's Committee on Decontamination and Decommissioning (E-24)**

Conference of Radiation Control Program Directors, Inc.

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April 8, 2021

Cynthia Barr

U.S. Nuclear Regulatory Commission

Washington, DC 20555-001

Subject: Docket No. NRC-2020-0192-0001 Draft NUREG-1757, Volume 2, Revision 2

Dear Ms. Barr:

Thank you for the opportunity to comment on the U.S. Nuclear Regulatory Commission's draft Consolidated Decommissioning Guidance – NUREG-1757, Volume 2, Revision 2. Our comments are provided below.

Appendix A – Implementing the MARSSIM Approach for Conducting Final Radiological Surveys

**Page A-6 through A-10, Generic comment on Section A.6 Instrument Selection and Calibration.** The term “should” is used 15 times. Should is not defined in this document. Recommend defining “should” in this section. Suggest providing additional clarification such as “or provide additional documentation or methods to validate measurements”.

Appendix F – Surface Water and Groundwater Characterization

**Page F-3, Line 4** – Suggest inserting the following sentence after the existing sentence that ends on Line 4: “The characterization of the subsurface must include descriptions of construction activities and buried infrastructure at the site that may have breached confining layers, thereby creating contaminant pathways from the uppermost aquifer to deeper aquifers (e.g., building foundations, buried pipes and tunnels, cofferdams, sheet piling, dewatering systems, etc.).”

**Page F-5, Generic comment on Section F.5 Groundwater Characterization** - Larger sites may have an active pump and treat program for chemicals and/or rad during decommissioning. Models should show water pathway and sampling plans during treatment and post treatment.

**Page F-6, Line 38** – Suggest inserting the following sentence after the word “groundwater”: “The extent of any breaches in confining layers, such as those caused by construction activities and buried infrastructure, that could provide preferred pathways for the vertical migration of

contaminants, should also be depicted in the cross-sections.”

**Page F-10, Line 37** – Suggest inserting the following sentences after the word “units”: “At some sites it may be necessary to determine the horizontal hydraulic gradient in aquifers below the uppermost aquifer. For example, at sites where confining layers have been disturbed by construction activities and buried infrastructure, providing direct pathways for contaminants to travel to deeper aquifers.”

**Page F-12, Line 15** - What is the basis for restricting surface water sampling locations to the "stream bank" when determining background surface water quality?

Again, thank you for this opportunity. Should you have any questions, please contact me at (609) 984-7443 or [karen.tuccillo@dep.nj.gov](mailto:karen.tuccillo@dep.nj.gov).

Sincerely,

A handwritten signature in black ink that reads "Karen Tuccillo". The signature is written in a cursive, flowing style.

Karen Tuccillo, E-24 Chairperson

C: Jay Vouglitois, NJBNE  
Jerry Hensley