

**From:** Robert Nelson  
**To:** Paul Goldberg  
**Date:** Mon, Nov 29, 1999 2:01 PM  
**Subject:** CRCPD PART O

DCB has reviewed the SSR & OSP comments. OSP did a very thorough review. Our additional comments follow.

1. OSP Comment Re: O.5c - While the requirement should be added, the appropriate section may not be O.5 because this section deals with timeliness requirements not financial assurance.

\* 2. The section references in Attachment A, Items 2 & 4 should be reviewed and revised to reference the correct section of the SSR.

NELSON

**CC:** DAo, John Hickey, Larry Camper

*NMSS / DWM comments*

Mr. Bruce Hirschler  
 Technical Assistant, SSR CR  
 Office of the Executive Director  
 Conference of Radiation Control  
 Program Directors, Inc.  
 205 Capital Avenue  
 Frankfort, KY 40601

Dear Mr. Hirschler:

As requested in Ken Weaver's memorandum of October 4, 1999, we have completed the review of Part O - Licensing Requirements for Decommissioning. The draft regulation was reviewed by comparison to the equivalent regulations in 10 CFR Parts 20 and 30.

As a result of our review, we have several comments about the regulation and its corresponding rationale which are provided at Enclosure 1. If the suggested changes are made, the regulation would meet the compatibility and health and safety categories established in the Office of State Programs (OSP) Internal Procedure SA-200.

We request that when this Suggested State Regulation is published as a final regulation, a copy of the "as published" regulation be provided to us for review. As requested in OSP Procedure SA 201, Review of State Regulations (November 10, 1998), please highlight any final changes and send one copy in a computer readable format, if possible.

If you have any questions, please contact me at (301) 415-2325 or Thomas O'Brien of my staff at (301) 415-2308 or TJO@NRC.GOV.

Sincerely,

Frederick C. Combs, Director  
 Office of State Programs

Enclosure:  
 As stated

cc: Ken Weaver, Chair  
 MOPS Subgroups, SR-1

Distribution:  
 DIR RF (9-216)  
 PHLohaus  
 SDroggitis  
 CRCPD File

DCD (SP02)  
 PDR (YES✓)

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# STATE PROGRAMS OFFICE TRACKING SYSTEM

## ACTIVE PROJECTS

Date: 10/12/99

ProjectID: 9-216

ProjectDescription: REVIEW OF PART O

StartDate: 10/12/99

Original Date: 10/31/99

ProjectLead: [ ]

Completion Date: [ ]

Due Date: 10/31/99

Status: [ ]

Requester/Office: KEN WEAVER/SUBGROUP SR-1

Extension Requested:

Extension Date: [ ]

RITS Code: [ ]

PA No: [ ]

*Call  
Bruce*

*Orrisign O'Brien*

*Per B Hirschler Telecan on  
10/25 -ok to respond  
by 11/19.*