

July 31, 2006

SENT VIA E-MAIL

Chief
Rules Review and Directives Branch
Mail Stop T6-D59
U.S. Nuclear Regulatory Commission
Washington DC 20555-001
Attention: Anna Bradford (AHB1@nrc.gov)

RE: *State of Idaho Comments on the Draft Standard Review Plan for Activities Related to U.S. Department of Energy Waste Determinations, NUREG-1854, Federal Register: May 31, 2006 (Volume 71, Number 104), Docket Nos. PROJ0734, PROJ0735, PROJ0736, and POOM-32.*

On May 31, 2006, the U.S. Nuclear Regulatory Commission issued a draft standard review plan for Activities Related to U.S. Department of Energy Waste Determinations for public comment. The state of Idaho has reviewed the draft standard review plan (SRP) and has the following comments:

~~1. The document is well written and provides for detailed evidence for~~

1 reviews of DOE waste determinations by the NRC that are defensible and repeatable.

2. Example 2-2 on page 3-20 of the SRP describes a scenario using residual contamination "thickness." This example relates to concentration averaging calculations which use "volume" (e.g. cubic centimeters) as its

methodology, the State understands that DOE will not develop a monitoring plan to solely meet the NDAA since it is a responsibility of the NRC. This statement should be agreed to by both DOE and the NRC prior to inclusion in the SRP.

5. Under section 10.2 of the SRP, lines 46-48, the NRC makes a statement that "the State has specific regulatory authority at the DOE site and the monitoring plan may include areas already regulated by the State". In Idaho, since DOE is self-regulating for radionuclides, this sentence would be more appropriate to claim that "the State *may have* specific regulatory authority..." which describes, more broadly, those situations not subject to ~~the regulations promulgated by CERCLA or RCRA~~

Please contact me at 208-528-2614 if you have any questions regarding these comments.

Sincerely,

(Signature on file)

Bruce Olenick
Environmental Analyst
State of Idaho, Department of Environmental Quality
Division of INL Oversight and Radiation Control (DEQ-INL)

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Subject: State of Idaho Comments on the Draft Standard Review Plan for
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