

November 13, 2000

Mr. Bruce Hirschler, Technical Assistant
Conference of Radiation Control
Program Directors, Inc.
205 Capital Avenue
Frankfort, KY 40601

Dear Mr. Hirschler:

We have reviewed the final "Part O - Decommissioning" of the Suggested State Regulations for Control of Radiation (SSRCR), dated August 2000, enclosed in your August 22, 2000 letter. In addition, we reviewed our May 9, 2000 letter to you providing comments on the December 1999 version of the Part O final regulations by comparison to the equivalent Nuclear Regulatory Commission (NRC) regulations in 10 CFR Parts 20 and 30.

As a result of the NRC review, we have determined that the August 2000 SSRCR Part O incorporates our earlier comments and meets the compatibility and health and safety categories established in the Office of State and Tribal Programs (STP) Procedure SA-200. Although not a matter of compatibility, we note that the SSRCR Part O did not include external sinking funds as an acceptable financial assurance mechanism in Section O.10c.

Also, as noted in our May 9, 2000 letter, when our revision to NRC Form 314 "Certificate of Disposition of Materials," is made, we will forward it to the Agreement States and the Conference of Radiation Control Program Directors, Inc. for comment before it is finalized. The final version of the form will then be forwarded so that Form T of the SSRCR can be revised accordingly to ensure that the compatibility and health and safety categories established in STP Procedure SA-200 continue to be met.

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

Sincerely,

/RA/

Frederick C. Combs, Deputy Director
Office of State and Tribal Programs

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Frederick C. Combs, Deputy Director
Office of State and Tribal Programs

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