NRC Inspection Program

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NMA/NRC Workshop
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Discussion Topics

- How the NRC conducts UR inspections
- Decommissioning Timeliness requirements
- NRC position on using non-approved standards for dose calculations

How NRC Conducts Inspections

Preparation by Inspector

- Generate inspection plan (non-public, identifies scope of inspection)
- Generate inspection report number (billing)
- Review docket file records
- Review event reports (excursions, spills)
- Locate inspection references
- Pack sampling equipment (survey meter)

How NRC Conducts Inspections, Cont.

Site Inspections -confirm license conditions and regulations are met

- Entrance Meeting (inspection scope)
- Interviews
- Site tours
- Review Records
- Take samples/perform confirmatory measurements
- Exit Briefing (preliminary findings)

How NRC Conducts Inspections, Cont.

After Inspection

- Travel back to office
- Discuss findings with RIV management & HQ Project Manager
- Write inspection report (within 30 days of exit briefing, publicly available)
- If a Notice of Violation is issued-may coordinate with Office of Enforcement
- Branch Chief reviews report and signs

Issue Identified During Inspections

"roving radiation areas"

- Tanks in CPP
- Filters in header houses
- ROs in satellites
- Waste storage bins

Require Radiation Area postings and restricted access

Decommissioning Timeliness

- Mid 2008 NRC determined that the "timeliness rule" under 10 CFR 40.42 applies to ISR wellfields
- Beginning in summer 2009, NRC will begin to inspect against this requirement

Decommissioning Timeliness, cont.

How 10 CFR 40.42 applies to ISR wellfields

- 10 CFR 40.42(d) - Within 60 days of deciding to permanently cease principal activities, a licensee must notify NRC and begin decommissioning as approved in your NRC restoration plan
- NRC has determined that the decision to permanently cease lixiviant injection constitutes cessation of principal activities for a wellfield

Decommissioning Timeliness, cont.

- Cessation of lixiviant injections and the shift from principal activity of uranium production to initiation of GW restoration constitutes the shift from an active to a decommissioning wellfield

- It is understood that residual uranium in the GW may still be recovered following the cessation of lixiviant injection- it is the NRC's position that recovery of uranium then becomes incidental to GW restoration

Decommissioning Timeliness, cont.

10 CFR 40.42(h)(1)

A licensee has 24 months to complete GW restoration, once begun,

OR

The licensee must notify the NRC and request an alternate schedule for completion of GW restoration

Decommissioning Timeliness, cont.

10 CFR 40.42(f) – Request to delay process

A licensee may request to delay or postpone initiation of the decommissioning process if it is not detrimental to public health & safety and it is in the public interest

The request must be submitted 30 days prior to the notification requirement in 10 CFR 40.42(d)

Decommissioning Timeliness, cont.

10 CFR 40.42(i) – Requesting an Alternate Schedule

NRC may approve a request for an alternate schedule if:

The licensee shows adequate justification (such as it is not technically feasible to complete within 24 months)

AND

An adequate alternative schedule is requested

AND

The health & safety of the workers and the public will be protected and the delay is in the public interest

Decommissioning Timeliness, cont.

- Requests for alternate decommissioning schedules and delaying decommissioning actions are licensing processes
- Send requests to your HQ project manager

Decommissioning Timeliness, cont.

NRC inspectors will look at current wellfields in restoration and ensure they are on schedule for restoration within 24 months

OR

Ensure the licensee has an NRC approved alternate schedule

Decommissioning Timeliness, cont.

If you are not currently able to complete restoration of wellfields within 24 months, and do not have an NRC approved alternate schedule for decommissioning….Contact your HQ project manager and discuss

Using Non-NRC Approved Dose Models

Part 20 dose requirements are based on ICRP Publications 26 & 30

Due to the way Part 20 was written a licensee MAY NOT use a newer version of ICRP guidance or other non-NRC approved models for calculating dose- even if some guidance is more conservative

Using Non-NRC Approved Dose Models, cont.

If a licensee wants to use a newer model to determine doses to workers (such as using ICRP 68 dose coefficients) they can request an exemption from the regulations to use different guidance

This is part of the licensing process- please discuss with you HQ project manager

Using Non-NRC Approved Dose Models, cont.

- As part of this exemption request, NRC staff expects to see a detailed analysis of why the request was initiated and a supporting technical discussion on how the proposed methodology compares (e.g., dose from all relevant radionuclides) with the current methodology in 10 CFR 20.
- In addition, the licensee would be expected to identify all aspects of their radiation protection program affected by incorporation of the proposed methodology

Any Questions??