




**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
WASHINGTON, D.C. 20555-0001

December 20, 2023

MEMORANDUM TO: Shaun M. Anderson, Branch Chief  
Reactor Decommissioning Branch  
Division of Decommissioning, Uranium Recovery  
and Waste Programs  
Office of Nuclear Material Safety  
and Safeguards

FROM: Tanya E. Hood, Project Manager  
Reactor Decommissioning Branch  
Division of Decommissioning, Uranium Recovery  
and Waste Programs  
Office of Nuclear Material Safety  
and Safeguards

 Signed by Hood, Tanya  
on 12/20/23

SUBJECT: SUMMARY OF NOVEMBER 29, 2023, PUBLIC MEETING TO  
DISCUSS THE REQUEST FOR ADDITIONAL INFORMATION  
ON NUCLEAR ENERGY INSTITUTE'S NEI 22-01 LICENSE  
TERMINATION PROCESS (EPID L-2023-NFO-0010)

On November 29, 2023, a virtual public meeting was held between Nuclear Energy Institute (NEI) and the U.S. Nuclear Regulatory Commission (NRC) to discuss proposed requests for additional information (RAIs) on the NEI 22-01, "License Termination Process" guidance for reactor licensees. NEI 22-01 provides industry guidance on preparing license termination plans and final site survey reports based on existing NRC guidance. In this meeting, NEI asked questions of the NRC staff to ensure they understood the proposed RAIs and that the regulatory basis for the questions were clear.

The meeting notice and agenda, posted November 24, 2023, are available in the Agencywide Documents Access and Management System (ADAMS) at Accession No. [ML23328A393](#) and are posted on the NRC's public Web page at <http://www.nrc.gov/reading-rm/adams.html>. Persons who do not have access to ADAMS or who encounter problems in accessing the meeting materials located in ADAMS should contact the NRC Public Document Room reference staff by telephone at 1-800-397-4209 or by email to [PDR.Resource@nrc.gov](mailto:PDR.Resource@nrc.gov).

NEI 22-01 was developed to assist decommissioning reactor licensees in the development of License Termination Plans (LTPs) that satisfy NRC requirements and provide an approach that aligns with previously published NRC guidance. The NRC staff proposed 9 RAIs and 9 observations in conjunction with the RAIs to support the remainder of the review.

CONTACT: Tanya Hood, NMSS/DUWP  
301-415-1387

The NRC staff proposed RAIs regarding the approach to submitting LTPs, clarifying partial site release, concentration of surrogate radionuclides, technical approach used for the final radiation survey (FSS) Plan, dose modeling, and groundwater. The NRC staff shared observations about NEI's information related to dose modeling, environmental guidance, FSS samples, well water and conceptual site models for groundwater systems. The RAIs were provided with the meeting notice under ADAMS [ML23325A193](#). No changes were made as a result of this meeting.

During the meeting, NEI indicated that it would revise Section 1.1.1 of NEI 22-01 to state that the LTP must be submitted in its entirety in order for the NRC staff to begin the acceptance review and detailed technical review. NEI also offered to revise Section 1.1.6 and Section 1.1.5.1 of NEI 22-01 to align with NUREG-1700, "Standard Review Plan for Evaluating Nuclear Power Reactor License Termination Plans," Appendix B and conform to the regulations in Title 10 of the *Code of Federal Regulations* (10 CFR) 50.83, "Release of part of a power reactor facility or site for unrestricted use."

NEI stated that it would clarify its use of the concentration of surrogate radionuclides and remove examples and references that did not align with current NRC guidance regarding the FSS Plan, dose modeling, and groundwater. NEI stated that the discussion of the NRC staff's observations provided them with a greater understanding. As a result of this awareness, NEI will provide additional approaches for dose modeling of exposure scenarios for buried residual radioactivity taken from those given in NUREG-1757, Volume 2, Revision 2, "Consolidated Decommissioning Guidance, Characterization, Survey and Determination of Radiological Criteria," DUWP-ISG-02, "Radiological Survey and Dose Modeling of the Subsurface to Support License Termination," and more recent LTPs to NEI 22-01. NEI 22-01 will also be revised to state that if radionuclide ratios are to be determined using FSS data, that at least 10 percent of measurements should include analysis for all radionuclides of concern, including hard-to-detect radionuclides in agreement with MARSSIM, NUREG 1575, "Multi-Agency Radiation Survey and Site Investigation Manual."

NEI stated that the public meeting discussion provided greater insight regarding information that was submitted in NEI-22-01. NEI stated that they will emphasize that to the extent practical, licensees should develop and submit LTPs earlier than 2 years prior to requesting release of the site. NEI 22-01 will be revised to describe the LTP license amendment request as a complex licensing activity where experience indicates it can take up to 2 to 3 years for an LTP to be approved from the time of initial submittal. NEI will state that supporting technical reports referenced in the LTP such as the Site Characterization Report and Background Study should accompany the license amendment request. To facilitate NRC reviews, NEI 22-01 will encourage licensees to meet with the NRC staff multiple times prior to submittal of the LTP to discuss the approach and technical detail of each LTP.

Based on insights gained from the discussion, NEI plans to submit its response to the NRC RAIs and observations by December 19, 2023. No regulatory decisions were made during the meeting.

Approximately 23 representatives from industry, state government, and NRC participated in the meeting. A list of the meeting attendees is enclosed. Members of the public were invited to attend. No public meeting feedback forms were received.

Please direct any inquiries to me at (301) 415-1387 or [Tanya.Hood@nrc.gov](mailto:Tanya.Hood@nrc.gov).

Sincerely,

Tanya Hood, Project Manager  
Reactor Decommissioning Branch  
Division of Decommissioning, Uranium Recovery  
and Waste Programs  
Office of Nuclear Material Safety  
and Safeguards

Enclosure:

1. List of Attendees

LIST OF ATTENDEES

NOVEMBER 29, 2023, RAI PUBLIC MEETING

WITH NUCLEAR ENERGY INSTITUTE

RE: NEI 22-01, LICENSE TERMINATION PROCESS

<b>Name</b>	<b>Organization</b>
Boby Abu-Eid	U.S. Nuclear Regulatory Commission (NRC)
Harry Anagnostopoulos	NRC
Shaun Anderson	NRC
Cynthia Barr	NRC
Randall Fedors	NRC
Marc Ferdas	NRC
Nathan Fuguet	NRC
Linda Gersey	NRC
Tanya Hood	NRC
Stacey Imboden	NRC
Christopher McKenney	NRC
Kathryn Robertson-DeMers	NRC
Michelle Rome	NRC
Ted Smith	NRC
Emil Tabakov	NRC
Bruce Watson	NRC
William Barley	Nuclear Energy Institute (NEI)
Bruce Montgomery	NEI
Richard McGrath	NEI
Micheal Smith	NEI
Gerard P. Van Noordennen	Energy Solutions
Jana Bergman	Public
Michael Keegan	Public

Enclosure

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 TERMINATION PROCESS (EPID L-2023-NFO-0010) DATE December 20, 2023

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OFFICE	NMSS/DUWP/RDB	NMSS/DUWP/RDB	NMSS/DUWP/RDB	
NAME	THood	THAnderson	SA THood	TH
DATE	Dec 19, 2023	Dec 20, 2023	Dec 20, 2023	

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