




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

August 7, 2025

MEMORANDUM TO: Michelle Sutherland, Acting 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 08/07/25

SUBJECT: SUMMARY OF JULY 2, 2025, PUBLIC MEETING TO DISCUSS
THE REQUEST FOR ADDITIONAL INFORMATION ON
NUCLEAR ENERGY INSTITUTE'S NEI 22-01, REVISION 1,
LICENSE TERMINATION PROCESS (EPID L-2025-NFO-0004)

On July 2, 2025, 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 was clear.

The meeting notice and agenda, posted June 5, 2025, are available in the Agencywide Documents Access and Management System (ADAMS) at Accession No. [ML25177C095](#) 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.

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 3 RAIs and 34 observations in conjunction with the RAIs to support the remainder of the review.

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The NRC staff proposed RAIs and observations regarding the dose contributions associated with the use of soil and demolition debris as backfill material being used to refill an excavated area. In radiological decommissioning, backfill may need to be characterized to ensure it meets safety and regulatory standards. The NRC staff also proposed RAIs regarding reporting and interpreting groundwater radionuclide results and sorption coefficient (K_d) values. A draft of the RAIs were provided with the meeting notice under ADAMS [ML25176A072](#). No changes were made as a result of this meeting. The final document was issued to the licensee under ADAMS [ML25176A070](#).

During the meeting, NEI indicated engineering judgement should take into account non-impacted areas that are not in close proximity of radiological areas. The NRC staff indicated that onsite borrow material is the concern that needs to be addressed. The NRC staff conveyed that a notation about dose being distinguishable from background would support licensees dealing with soil from borrowed soils. NEI stated that it would take a closer look at RAI 1 during their review to determine an appropriate response.

NEI stated that it would clarify the treatment and reporting of analytical results that fall between the critical level and the minimum detectable concentrations (MDCs) for estimating residual radioactivity and dose due to residual radioactivity in groundwater. NEI stated that the discussion of the NRC staff's observations provided them with a greater understanding of NRC guidance for interpreting and reporting groundwater analytical data and the possibilities for risk-informed approaches for implementing the guidance.

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 to the extent practical that measurements of K_d are not required at sites but is one of several possible approaches based on NRC's guidance in DUWP-ISG-02, "Radiological Survey and Dose Modeling of the Subsurface to Support License Termination." As a result of this awareness, NEI will add excerpts from DUWP-ISG-02 along with additional context and examples in an appendix. The licensee indicated that it is aware that this parameter is site-specific.

There was expanded discussion on 14 observation areas. A few outcomes were associated with the necessity of proofing in situ gamma spectroscopy results, especially in non-impacted areas. There was agreement that proofing is necessary in radiological areas where substructures are being left behind but may not be required in outlying non-impacted areas. There was agreement regarding post-remediation monitoring being necessary for mobile radionuclides like strontium-90 and tritium in any solid media, but not for non-mobile radionuclides. There was agreement that language could be added to note that samples of the highest activity materials in the reactor vessel and surrounding concrete from the activation analysis is sufficient for use instead of direct sampling, provided they are sufficient for waste disposal and DRP assessment. NEI also agreed to incorporate NRC's environmental suggestions into a revision of NEI-22-01.

Based on insights gained from the discussion, NEI submitted its response to the NRC RAIs and observations on August 4, 2025 under ADAMS ([ML25216A260](#)). No regulatory decisions were made during the meeting. Approximately 20 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.

Enclosure:

1. List of Attendees

LIST OF ATTENDEES

JULY 2, 2025, RAI PUBLIC MEETING

WITH NUCLEAR ENERGY INSTITUTE

RE: NEI 22-01, REVISION 1, LICENSE TERMINATION PROCESS

Name	Organization
Tanya Hood	U.S. Nuclear Regulatory Commission (NRC)
Amy Snyder	NRC
Briana Arlene	NRC
Christian Ridge	NRC
Emil Tabakov	NRC
Gregory Chapman	NRC
Harry Anagnostopoulos	NRC
Karen Pinkston	NRC
Nathan Fuguet	NRC
Randall Fedors	NRC
Shaun Anderson	NRC
Stacey Imboden	NRC
Storm Veunephachan	NRC
Bruce Montgomery	Nuclear Energy Institute (NEI)
Eric Darois	Contractor NEI
Richard McGrath	Contractor NEI
William H. Barley	Contractor NEI
Tom Williamson	Holtec
Alonzo McSwain	Public

Enclosure

SUMMARY OF JULY 2, 2025, PUBLIC MEETING TO DISCUSS THE REQUEST FOR ADDITIONAL INFORMATION ON NUCLEAR ENERGY INSTITUTE'S NEI 22-01, REVISION 1, LICENSE TERMINATION PROCESS (EPID L-2025-NFO-0004) DATE August 11, 2025

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NAME	MSutherland	MS THood	TH	
DATE	Aug 7, 2025	Aug 7, 2025		

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