



STP Procedure Approval

***Implementation of the Grant Program
for Funding Assistance for
Formerly Licensed Sites in Agreement States***

SA-1000

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NOTE

The STP Director's Secretary is responsible for the maintenance of this master copy document as part of the STP Procedure Manual. Any changes to the procedure will be the responsibility of the STP Procedure Contact. Copies of STP procedures will be distributed for information.



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I. INTRODUCTION

- A. This document describes the procedures for conducting the Grants Program including processing applications, conducting technical and budget evaluation and executing financial assistance action.
- B. The program will be administered in conformance with the Federal Grant and Cooperative Agreement Act of 1977, the Atomic Energy Act of 1954, as amended, and related guidance from the Office of Management and Budget, SECY 99-193, and the SRM for SECY 99-193.
- C. The responsibility for conducting the Grants Program, is shared by the Office of State and Tribal Programs (STP) and the Division of Contracts and Property Management (DCPM), Office of Administration, as stated in NRC Management Directive (MD) 11.6.

II. OBJECTIVES

- A. To provide the guidelines that will be followed by Agreement States when preparing grant proposals for NRC review.
- B. To provide guidelines to STP and DCPM for administration and coordination of Grants Program.

III. BACKGROUND

Pursuant to Section 274.i of the Atomic Energy Act of 1954, as amended, the NRC's STP will assist Agreement States through providing funds for the purpose of reviewing files, conducting surveys, characterizing and remediating sites formerly licensed by the Commission.

The grant program will be administered to ensure a proper, fair, and equitable use of available funds to assist Agreement States with remaining formerly licensed sites to complete necessary file reviews and surveys; site characterization; and remediation, if necessary. Eligible Agreement States that desire funding assistance shall submit a written grant proposal to NRC for review and approval. The program will include procedures to conduct risk-ranking of the sites to ensure that funds are available for the "high risk" sites in the event that the appropriated funds are less than requested or prove to be insufficient to fully remediate remaining identified sites. Additional information on the risk ranking system will be provided at a later date, if necessary.

IV. ROLES AND RESPONSIBILITIES

A. Office of the General Counsel (OGC):

Review all applications regarding the suitability of using an assistance instrument and the potential for conflicts of interest.

B. Director, STP:

1. Serves as the recommending official to the Executive Director for Operations for program areas funded by the office;
2. Ensures review of applications regarding the appropriateness of technical assistance funding and the potential for conflicts of interest.

C. Director, DCPM:

1. As the agent for the NRC, performs detailed financial and business analysis, executes the assistance instruments, and ensures the assistance document is managed after award in coordination with STP;
2. Ensures the official record file relative to all actions funded through NRC financial assistance instruments is maintained;
3. Ensures closeout and deobligation of funds upon completion of the project provided financial assistance.

D. Project Manager for Grants Program Coordination, STP:

Acts as the STP lead staff for the day-to-day management of Grant Program, including technical review of grant proposals for completeness and reasonableness of the cost estimate, tracking the status of grant proposals, maintaining statistical information on the proposals, interfacing with DCPM and OGC for interactions regarding the Grant Program.

E. Grants Officer, DCPM:

Acts as the DCPM lead staff for the day-to-day management of Grants Program to ensure the processing, award, and administration of all financial assistance actions.

V. GUIDANCE

A. Agreement State Grant Proposal

The grant program is organized into four different kinds of proposals for funding assistance: (1) proposal for file review and/or initial survey; (2) proposal for regulatory oversight for site characterization and/or remediation; (3) proposal for site characterization; and (4) proposal for site remediation. Each State that desires funding assistance shall submit a written grant proposal to the Attention of :

Grants Officer
Division of Contracts and Property Management
Office of Administration
Mail Stop T-7-I-2
U.S. Nuclear Regulatory Commission
Washington, DC 20555

A sample grant proposal for file review and/or initial survey is shown in Appendix A. Each proposal should contain basic information including project goals and objectives, project management, period of the project, project total cost, and anticipated results. In addition, the proposal should include the following information depending on the type of proposal being submitted:

- (1) Proposal for File Review and/or Initial Survey
 - a. a brief description of each file to be reviewed;
 - b. the number of loose material and/or sealed source files to be reviewed;
 - c. estimated work hours by major activity for each file (including review of records and documents, travel, interviews, survey and sampling, etc.);
 - d. estimated hourly rate of the person(s) conducting the reviews and/or initial surveys;
 - e. estimated cost for file review and/or initial survey (using data from items c and d);
 - f. estimated worker benefit cost;
 - g. estimated travel and per diem cost;

- h. estimated supplies and service cost;
- i. estimated total direct cost (using data from items e to h);
- j. estimated total indirect cost;
- k. estimated total cost (items i plus j);
- l. estimated laboratory analysis and service costs, if any;
- m. estimated grand total cost (items k plus l); and
- n. any supporting information that will strengthen the proposal.

(2) Proposal for Regulatory Oversight for Site Characterization and/or Remediation

- a. brief description of each site that needs regulatory oversight for site characterization and/or remediation;
- b. the number of sites that need regulatory oversight for site characterization and/or remediation;
- c. estimated work hours by major activity for each site (including review of records and documents, travel, administration record keeping and correspondence, etc.);
- d. estimated hourly rate of the person(s) conducting the oversight;
- e. estimated cost for sites that need regulatory oversight (using data from items c and d);
- f. estimated worker benefit cost;
- g. estimated travel and per diem cost;
- h. estimated supplies and service cost;
- i. estimated total direct cost (using data from items e to h);
- j. estimated total indirect cost;

- k. estimated total cost (items i plus j);
- l. estimated laboratory analysis and service costs, if any;
- m. estimated grand total cost (items k plus l); and
- n. any supporting information that will strengthen the proposal.

(3) Proposal for Site Characterization

Note that Agreement States should complete all file reviews and/or initial surveys before submitting their site characterization proposal to NRC, and each proposal should deal with only one specific site.

- a. a brief description of the site characterization plan;
- b. estimated work hours by major activity for the site including regulatory oversight and actual site characterization work;
- c. estimated hourly rate of the person(s) conducting the activity including regulatory oversight and actual site characterization work;
- d. estimated cost (using data from items b and c);
- e. estimated worker benefit cost;
- f. estimated travel and per diem cost;
- g. estimated supplies and service cost;
- h. estimated total direct cost (using data from items d to g);
- i. estimated total indirect cost;
- j. estimated total cost (items h plus i);
- k. estimated laboratory analysis and service costs, if any;
- l. estimated grand total cost (items j plus k);
- m. documentation that none of the following three conditions exist:

(1) the current site owner is financially capable for site characterization, (2) the original licensee is still in existence and financially capable, or (3) the site qualifies for the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) funding assistance; and

n. any supporting information that will strengthen the proposal.

(4) Proposal for Site Remediation

Note that each proposal deals with only one specific site.

- a. a brief description of site cleanup plan;
- b. estimated work hours by major activity for the site including regulatory oversight and actual site remediation work;
- c. estimated hourly rate of the person(s) conducting the activity including regulatory oversight and actual site remediation work;
- d. estimated cost (using data from items b and c);
- e. estimated worker benefit cost;
- f. estimated travel and per diem cost;
- g. estimated supplies and service cost;
- h. estimated total direct cost (using data from items d to g);
- i. estimated total indirect cost;
- j. estimated total cost (items h plus i);
- k. estimated laboratory analysis and service costs, if any;
- l. estimated grand total cost (items j plus k) including regulatory oversight and actual site remediation work;
- m. an estimate of the residence or worker population, if any, within the contaminated area(s);

- n. accessibility of the contaminated site to the public;
- o. average gamma surface dose rate of the contaminated areas;
- p. an estimate of the contaminated areas;
- q. an estimate of the total volume of waste;
- r. an estimate of percentage of contaminated area where the level of removable contamination exceeds permissible regulatory limits;
- s. any economic impact of not cleaning up the site immediately;
- t. the funding needed for each year and the amount of time needed to complete site cleanup activities;
- u. plans for disposal of waste and availability of the waste disposal site;
- v. a statement or conclusion (and supporting basis) that the contaminated site could result in doses that exceed the 25 millirem/year public dose limit;
- w. documentation that none of the following three conditions exist: (1) the current site owner is financially capable of conducting the site remediation, (2) the original licensee is still in existence and financially capable, or (3) the site qualifies for CERCLA funding assistance;
- x. any considerations that would warrant that this site needs to be remediated in a short period of time; and
- y. any supporting information that will strengthen the proposal.

B. Processing Applications

- 1. Receipt of Applications
 - a. Agreement State applications for funding assistance shall be submitted to the DCPM, Office of Administration. DCPM will acknowledge receipt of all applications.

- b. DCPM will date-stamp and enter applications in an application receipt log. This log shall contain at least the following information:
 - i. Name and address of Agreement State applicant;
 - ii. Announcement for which the application was submitted;
 - iii. Date and time of receipt;
 - iv. Control number assigned;
 - v. Award instrument number (if award is made);
 - vi. Disposition of application.
- c. Upon receipt of an application, DCPM will inform OGC and STP, and review participants from DCPM, OGC and STP will meet to review the proposal and establish the review schedule.

2. Review of Grant Proposal

Each grant proposal will be reviewed against the following criteria by the review participants from DCPM, OGC and STP:

- a. The common evaluation criteria for each proposal are as follows:
 - i. Clarity of statement of project objectives, management and anticipated results;
 - ii. The completeness of the cost estimate;
 - iii. The level of supporting detail presented; and
 - iv. The reasonableness of the cost estimate (i.e., the accuracy and magnitude of estimated costs) in relation to the work to be performed and anticipated results.
- b. Additional evaluation criteria for site characterization proposal: The funding will not be granted to a site if any of the following conditions exist.

- i. The current site owner is financially capable for site characterization.
 - ii. The original licensee is still in existence and financially capable.
 - iii. The site qualifies for CERCLA funding assistance.
- c. Additional evaluation criteria for site remediation proposal:

The funding will not be granted to a site if any of the following conditions exist.

- i. The current site owner is financially capable for site remediation.
 - ii. The original licensee is still in existence and financially capable.
 - iii. The site qualifies for CERCLA funding assistance.
 - iv. Site remediation is proposed for compliance with a more conservative criterion than 25 millirem/year.
3. Award Process
- a. Following office staff review, the STP project manager will provide recommendations to the STP director, OGC and DCPM for concurrence.
 - b. The STP director will appraise technical merit and budget considerations.
 - c. OGC will appraise whether the subject matter of an application is appropriate for financial assistance to ensure compliance with the Federal Grant and Cooperative Agreement Act.
 - d. DCPM will ensure performance of the preaward cost analysis and will make the final determination that costs proposed are fair and reasonable.

- e. DCPM will notify prospective awardees of their selection by receipt of an award document or by a letter.

C. Execution of Financial Assistance Action

1. The grant for Agreement States is funded on a cost reimbursement basis not to exceed the amount awarded as indicated on the award document and is subject to a refund of unexpended funds to NRC.
2. Award recipients are responsible for the performance under grants and other agreements and, ensure that time schedules are being met, projected work units by time periods are being accomplished, and other performance goals are being achieved.
3. Status reports shall be submitted in letter format at a frequency as specified in the award document and a final report shall be submitted no later than the expiration date of the award period. The content of the status report shall be as follows:
 - a. A comparison of actual accomplishments with the goals established for the period, the findings of the project, or both.
 - b. Other pertinent information including, when appropriate, analysis and explanation of anticipated high unit costs.
 - c. Between the required status reporting dates, events may occur that have significant impact on the project. In such instances, the recipient shall inform the NRC as soon as the following types of conditions become known:
 - i. Problems, delays, or adverse conditions that will materially affect the ability to attain project objectives, prevent the meeting of time schedules and goals.
 - ii. Favorable developments or events that enable time schedules to be met sooner than anticipated or more work units to be produced than originally projected.

- iii. If any performance review conducted by the recipient discloses the need for change in the budget estimates, the recipient shall submit a request for budget revision.
- 4. Grant vouchers should contain total cost and cost breakdowns for the following items that are applicable to a grant project.
 - a. Labor cost
 - b. Travel cost
 - c. Per diem cost
 - d. Lab cost
 - e. Supply and service cost (if applicable)
 - f. Overhead cost (if applicable)
 - g. Others (if applicable)

D. Evaluation of Agreement State Technical Activities Conducted Under A Grant

- 1. NRC reviews Agreement State radiation control programs in an integrated manner, using common and non-common performance indicators as specified in MD 5.6., Integrated Materials Performance Evaluation Program (IMPEP).
- 2. Agreement State activities, such as licensing actions, implemented through the Grant Program are candidates for review during IMPEP reviews. The guidance given in STP Procedure SA 104, Reviewing Common Performance Indicator #4, Technical Quality of Licensing Actions, should be used.

VI. APPENDICES

Appendix A - Sample grant proposal for file review and initial survey.

VII. REFERENCES

- 1. NRC Management Directive 11.6, *Financial Assistance Program*.
- 2. NRC Management Directive 5.6, *Integrated Materials Performance Evaluation Program*.
- 3. SA 104, *Reviewing Common Performance Indicator #4, Technical Quality of Licensing Actions*.

Appendix A

SAMPLE GRANT PROPOSAL FOR FILE REVIEW AND/OR INITIAL SURVEY

Mr./Ms. (Name)
Grants Officer
Division of Contracts and Property Management
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Mr./Ms.(Name):

Enclosed is [STATE]'s grant proposal for [file review and initial survey] of [four] formerly licensed sites. The proposal includes the following information:

- Enclosure 1. Project description
- Enclosure 2. A summary of the pending files which consists of [two] sealed source files and [two] loose material files.
- Enclosure 3. Estimated cost for file review and/or initial survey.
- Enclosure 4. A copy of summary of files with Oak Ridge National Laboratory (ORNL) score. This summary was sent to us from NRC Region [I, II, III or IV] office.

It was estimated that a total of [\$12,889] will be needed to complete file reviews and initial surveys of these [four] formerly NRC licensed sites.

If you have any questions, please feel free to contact me at (telephone number) or (name of State contract) of my staff at (telephone number) or (e-mail address).

Sincerely,

(Name of Radiation Control Program Director or designee),
(Director or title of designee), (Radiation Control Program)

Enclosures:
As stated

PROJECT DESCRIPTION

1. Project Goals and Objectives

The project's goals and objectives should be clearly stated in the proposal.

Example:

Review NRC license files to determine the scope of previous work including the list of radionuclides, processes, potential for off-site release of radioactive contamination, and current status. As part of the review, [State name] files will be researched to determine if the State of [State name] granted a radioactive materials license to the company or address

Determine whether a site visit is required to resolve any of the concerns identified during the review. Coordinate site visits with the former licensee (if possible), and the current site owner before the visit. Site visits to sealed source sites will normally be to perform surveys. No sample analyses are expected to be performed at sealed source sites.

Survey and/or sample the site for residual contamination or other radioactive material associated with the previous licensed activities, if necessary, to verify the status of the site. Determine whether remedial actions are required to remove radioactive materials in excess of the regulatory limits pertaining to decommissioning of sites. Determine which files can be closed and which sites require characterization or remediation activities. Make every attempt to close out files when data are available to support such action. This assessment will include a review of the available historical data and the current radiological status.

Write a summary report for each site to document the State's assessments and findings.

2. Project Management

The proposal should identify the project manager or individual responsible for direct (day-to-day) management of the project.

Example:

The project manager is [name], [title], the individual responsible for direct (day-to-day) management of the project is [name], [title].

3. Period of the Project

The proposal should identify the project starting and stop dates.

Example:

The project will start within 30 days of the award of the grant, or at such other time as specified in the grant award notice, and be completed within six months of the start date.

4. Project Anticipated Results

The anticipated results after completion of the project should be clearly stated in the proposal.

Example:

An assessment and findings report will be generated. The anticipated results after completion of the project are an assessment of whether further actions are necessary or if the State can close the file. The final report will include the State's assessments and findings for each file reviewed. This will include a finding as to whether the file should be open for further actions, such as site characterization/remediation, or the file should be closed and no further action is required. The basis for closing a file will be stated such as a finding that no unlicensed, abandoned sources, or residual radioactive material where the level of contamination exceeds permissible regulatory limits exist at the subject site(s). The decision criterion will also be provided such as state requirements or standards to be applied.

A status report will be provided within three months from the award date of the grant. A final report will be submitted within 30 days from the expiration date of the grant.

5. Total Cost of the Project

The proposal should identify the total cost for the completion of the project.

SUMMARY OF FORMERLY LICENSED SITES THAT NEED FILE REVIEW AND/OR INITIAL SURVEY

(1) Sealed Source (2 files)

No.	License No.
1	xxx-xxxxxx
2	xx-xxxxxx-xx

(2) Loose Material (2 files)

No.	License No.
1	xxx-xxxxxx
2	xx-xxxxxx-xx

ESTIMATED COST FOR FILE REVIEW AND/OR INITIAL SURVEY

Step 1: Estimate work hours by major activity for each file

Sealed Source File #1	
Activity	Time (hours)
Interviews	4
Travel	8
Review records & documents	6
Survey & sampling	4
Sample transfer & laboratory delivery	2
Data evaluation & writing report	2
Administration record keeping & correspondence	2
Other (specify)	
Total	28

Sealed Source File #2	
Activity	Time (hours)
Interviews	0
Travel	0
Review records & documents	5
Survey & sampling	0
Sample transfer & laboratory delivery	0
Data evaluation & writing report	0
Administration record keeping & correspondence	3
Other (specify)	
Total	8

*** Numbers in shaded areas need to be replaced with actual numbers.**

Enclosure 3

Loose Material File #1	
Activity	Time (hours)
Interviews	4
Travel	2
Review records & documents	5
Survey & sampling	2
Sample transfer & lab delivery	5
Data evaluation & writing report	4
Administration record keeping & correspondence	3
Other (specify)	
Total	25

Loose Material File #2	
Activity	Time (hours)
Interviews	7
Travel	4
Review records & documents	2
Survey & sampling	8
Sample transfer & lab delivery	2
Data evaluation & writing report	2
Administration record keeping & correspondence	2
Other (specify)	
Total	27

*** Numbers in shaded areas need to be replaced with actual numbers.**

Step 2: Enter the total work hours reported in step 1 for each file into the appropriate cells below, and add them to obtain a total.

File	Total time (Hours)
Sealed Source File #1	28
Sealed Source File #2	8
Loose Material File #1	25
Loose Material File #2	27
Total Hours	88

Step 3: List the average hourly rate for person(s) conducting file review and/or initial survey

Average hourly rate = \$33.50

Step 4: Multiply the average hourly rate by total hour reported in step 2 to determine the cost.

\$33.50 x 88 (hours) = \$ 2,948

Step 5: Determine worker benefit cost

Percentage of worker benefit = 25.5%

\$2,948 (total cost from Step 4) x 25.5% = \$752

Step 6: Estimate Travel and Per Diem cost

Sealed Source Site #1	\$370
Sealed Source Site #2	\$0.00
Loose Material Site #1	\$505
Loose Material Site #2	\$807
Total	\$1,682

*** Numbers in shaded areas need to be replaced with actual numbers.**

Step 7: Estimate supplies and service cost

List of supplies and service	Cost
Supply item #1	\$170
Supply item #2	\$220
Service item #1	\$105
Service item #2	\$185
Total	\$680

Step 8: Estimate total direct cost

Items	Cost
Cost (Step 4)	\$2,948
Worker benefit cost (Step 5)	\$752
Travel and per diem cost (Step 6)	\$1,682
Supply and service cost (Step 7)	\$680
Total	\$6,062

Step 9: Estimate total indirect cost

Percentage of indirect cost = 10.5%

\$6,062 (total cost from Step 8) x 10.5% = \$637

Step 10: Direct plus indirect cost

\$6,062 (direct cost) + \$637 (indirect cost) = \$6,699

*** Numbers in shaded areas need to be replaced with actual numbers.**

Step 11: Estimate laboratory analysis and service costs

(1) Gamma analysis for sealed source site #1

Type of sample	Projected sample quantity/site	Cost per sample	Cost for each type of sample
Soil	0	\$89.00	\$0.00
water	0	\$58.00	\$0.00
wipes	4	\$45.00	\$180.00
Gamma analysis cost for sealed source #1			\$180.00

(2) Gamma analysis for sealed source site #2

Type of sample	Projected sample quantity/site	Cost per sample	Cost for each type of sample
Soil	0	\$89.00	\$0.00
water	0	\$58.00	\$0.00
wipes	6	\$45.00	\$270.00
Gamma analysis cost for sealed source #2			\$270.00

(3) alpha-spectrum analysis for loose material site #1

Type of sample	Projected sample quantity/site	Cost per sample	Cost for each type of sample
Soil	5	\$180	\$900.00
water	4	\$150	\$600.00
wipes	12	\$170	\$2040.00
Alpha-spectrum analysis cost for loose material #1			\$3540.00

* Numbers in shaded areas need to be replaced with actual numbers.

(4) Alpha-spectrum analysis cost for loose material #2

Type of sample	Projected sample quantity/site	Cost per sample	Cost for each type of sample
Soil	3	\$180	\$540.00
water	2	\$150	\$300.00
wipes	8	\$170	\$1360.00
Alpha-spectrum analysis cost for loose material #2			\$2200.00

(5) Total laboratory analysis and service cost

Item	laboratory analysis and service cost
Sealed source site #1	\$180.00
Sealed source site #2	\$270.00
Loose material site #1	\$3540.00
Loose material site #2	\$2,200.00
Total laboratory and analysis cost	\$6,190.00

Step 12: Determine the estimated grand total cost

\$6,699 (from Step 10) + \$ 6,190 (from Step 11) = \$12,889

*** Numbers in shaded areas need to be replaced with actual numbers.**

**FORMER AEC/NRC TERMINATED LICENSES LOCATED IN THE STATE OF
(STATE NAME)** (This can be found in Files Transferred from NRC Region Offices)

STATUS	SCORE	SEALED SOURCE	OPERATION	FILE AVAILABLE
Open	xx	(Yes)	(Well Logging)	(Yes/No)
(Company Name)		CITY: YYY		Terminated: mm/yy
LICENSE: xxx-xxxxx			DOCKET: xx-xxxxx	
ORNL COMMENTS: Pu-Be sources. No source disposition, close-out surveys or final AEC inspection conducted				
Open	xx	(Yes)	(Radiography)	(Yes/No)
(Company Name)		CITY: YYY		Terminated: mm/yy
LICENSE: xxx-xxxxx			DOCKET: xx-xxxxx	
ORNL COMMENTS: Ir-192, Co-60. No source disposition given, final close-out survey or AEC inspection conducted.				
Open	xx	(No)	(Cobalt 60 encapsulation)	(Yes/No)
(Company Name)		CITY: YYY		Terminated: mm/yy
LICENSE: xxx-xxxxx			DOCKET: xx-xxxxx	
ORNL COMMENTS: Authorized up to 10 Curies of loose Co-60. No source disposition given, final close-out survey or AEC inspection conducted.				
Open	xx	(No)	(Airplane Manuf.)	(Yes/No)
(Company Name)		CITY: YYY		Terminated: mm/yy
LICENSE: xxx-xxxxx			DOCKET: xx-xxxxx	
ORNL COMMENTS: Mag-thor alloy use. No source disposition given, final close-out survey or AEC inspection conducted.				