

PDR



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

FEB 28 2000

ADM-001
~~ML993160330~~

ICF Incorporated
ATTN: Ms. Frances Schossow
Project Administrator
9300 Lee Highway
Fairfax, VA 22031-1207

Dear Ms. Schossow:

Subject: Modification No. 2 to Task Order No. 21
under Contract No. NRC-04-95-065

The purpose of this modification is to (1) extend the period of performance, at no additional cost to the Government by 1 month; (2) add a draft report to the required deliverables at no additional cost to the Government; and (3) provide calendar dates for certain deliverables as specified in the enclosed Statement of Work (SOW). All other terms and conditions of the subject task order, including the ceiling amount of \$438,878.00, remain unchanged.

Accordingly, the following is substituted for the first sentence of paragraph 2 in the definitization letter dated 07/01/99, "Task Order No. 21 shall be in effect from July 1, 1999 through May 29, 2001."

Also, the enclosed SOW replaces the SOW included with the above-mentioned definitization letter. Any changes made have been typed in bold-faced print and represent no cost to the ceiling.

A summary of obligations for this task order, from award date through the date of this action, is given below:

Total FY99 Obligation Amount:	\$161,621
Total FY00 Obligation Amount:	\$250,000
Cumulative Total of NRC Obligations:	\$411,621

This modification obligates no FY00 funds.

Should you have any questions regarding this modification, please contact the contract specialist, Ms. Amy Siller, on (301) 415-6747.

Sincerely,

for Stephen M. Roof
Mary Mace, Contracting Officer
Contract Management Branch 1
Division of Contracts & Property Mgmt.

Enclosure: As stated

DF02

STATEMENT OF WORK

Technical Assistance for Rulemaking on Clearance of Materials and Equipment Having Residual Radioactivity

Contract No. 04-95-065
Job Code J5236
Task Order 21, Modification 2

Modification of this Task Order under Contract No. 04-95-065 is necessary to reflect a number of changes and unanticipated events related to the U.S. Nuclear Regulatory Commission's activities in the area of the release of control of solid materials and equipment having residual radioactivity.

Changes to the Task Order are in **BOLD** and indicated as follows:

Section 3.0 WORKSCOPE, Subtask 1, Paragraph 1.1.E is revised to read as follows:

- E. A draft Commission information package consisting of an attachment to a draft SECY paper addressing the deliberations and results of the EPR and the NEPA scoping process with any relevant supporting documentation, either by direct inclusion or by reference, relating to the alternatives for the proposed rule on clearance. **The contractor shall prepare an analysis of all the public comments (including public meetings' transcripts) received by the issue paper's public comment closing date, to be included as part of the draft SECY paper information package.**

Section 3.0 WORKSCOPE, Subtask 1, Paragraph 1.3 is revised to read as follows:

- 1.3 Specifically, the contractor shall, as directed by the NRC TPM, provide technical assistance in conducting the EPR and NEPA scoping processes in support of a rulemaking on the need for regulations on the clearance of materials and equipment having residual radioactivity. Conduct of this scoping process must comply with the provisions of 10 CFR Part 51; specifically with Sections 51.26-29. Moreover, the contractor shall categorize and address public comments made at the four public meetings tentatively scheduled from **September to December 1999**. These meetings will focus on issues identified in the NRC Issues Paper for Discussion and on any additional issues raised during the course of these meetings.

Section 3.0 WORKSCOPE, Subtask 1, Paragraph 1.4.D is revised to read as follows:

- D. Prepare a draft Commission information package consisting of an attachment for a SECY paper addressing the deliberations and results of the EPR and NEPA scoping processes with any relevant supporting documentation, either by direct inclusion or by reference, relating to the alternatives for the proposed rule on clearance. **This attachment shall consist of an analysis of all the public comments (including public meetings' transcripts) received by the issue paper's public comment closing date, to be included as part of the draft SECY paper information package.**

Section 3.0 WORKSCOPE, Subtask 2, Paragraph 2.3.A is revised to read as follows:

- A. Identify and provide a preliminary assessment of the rulemaking alternatives (PARA) to be evaluated in the draft GEIS. Appendix A.5 of 10 CFR Part 51 indicates that all reasonable alternatives shall be identified.
 - i. **To reflect the comments received during the public comment period for the issues paper, the contractor will prepare a conceptual analysis of regulatory alternatives prior to the preparation of the PARA.**
 - ii. **Following Commission direction resulting from its review of the SECY paper and Commission briefing on the results of the public workshops and the issues paper public comment period, the contractor shall begin to prepare the PARA in preparation for a draft GEIS.**

Specific alternatives to be considered shall be discussed with the NRC TPM;

Section 3.0 WORKSCOPE, Subtask 2, Paragraphs 2.4.A and B are revised to read as follows:

- A. An information package delineating the standard format and content for cost/benefit analysis required for the TBC and any other contractor to use in order to prepare information to be submitted for the contractor's cost/benefit analyses. **As necessary, the standard format and content for cost/benefit analysis shall be revised as the information base of cost/benefit-related data is enhanced during the conduct of this contract. The TBC and other NRC contractors involved in the NRC's evaluation of the need for a rulemaking to control the release of solid materials and equipment having residual levels of radioactivity shall identify such data and information that does not conform to the current specifications of the standard format and content for cost/benefit analysis. As necessary and after consultation with the TBC, the contractor shall notify the NRC TPM regarding the need for revision of the SF&C. After notifying the NRC TPM of the need for revision in conjunction with an estimate of the cost, schedule and product impacts, the contractor shall revise the SF&C upon approval by the NRC TPM.**
- B. A conceptual analysis of regulatory alternatives reflecting the public comments from the issues paper comment period, as well as from the EPR process. Should the Commission direct the NRC staff to proceed with a rulemaking, the contractor shall proceed to prepare a preliminary assessment (PARA) of the rulemaking alternatives to be evaluated in the draft GEIS.

Section 4.0 REPORTING REQUIREMENTS, Paragraph 1 is revised to read as follows:

1. As part of the performance of this Task Order, the contractor shall provide a monthly written progress report by the 15th of the following month summarizing the work performed during the previous calendar month. Monthly status reports shall be self-contained and shall include an executive summary that summarizes the results with regard to the project objectives as defined in the statement of work for this Task Order. The executive summary shall be structured to enhance the usefulness of reports to the licensing staff and the agency as a whole. Monthly letter progress reports shall describe the monthly level of effort by various levels of pay, the technical work performed corresponding to the billing, technical and administrative issues, a log of the expenditures, and a projection of the spending plan by subtask. Vouchers billing work performed shall be preceded by or accompanied with a monthly letter status report corresponding to and accounting for the billing. The monthly letter progress report shall break down the number of hours billed and percent of effort by staff level corresponding to the billing. Project spending plans and billings shall be at the subtask level. The monthly letter progress report or billing shall include a tracking of the spending plan, a cumulative accounting of the spending, as well as the current billing. The monthly progress letter report shall include a section that clearly identifies issues, difficulties, needed decisions on the part of the NRC TPM, and financial concerns. **Finally, the monthly report shall provide an estimated month by month forecast of total projected expenditures for the next 12 months, as an indicator for future funding adjustments.**

Section 10.0 DELIVERABLES is revised to read as follows:

The deliverables discussed below shall adhere to NRC formats and conventions for regulatory products, as stipulated in Section 4.0 above.

<u>Product</u>	<u>Due Date</u>	
	<u>Draft</u>	<u>Revised or Final¹</u>
Subtask 1: Assistance with Enhanced Participatory Rulemaking Process and NEPA Scoping Process and Analysis of Public Comments		
Assistance in preparation of FRN of intent to hold public meetings and to conduct a scoping process	1 mo. after Task Order award	2 mos. after Task Order award
Prepare database & software format for assembling and organizing public comments	1.5 mos. after Task Order award	3 mos. after Task Order award
Prepare a database of public comments	3 wks. after first meeting	2/11/2000
Prepare a public comment summary	1/21/2000	2/04/2000
EPR and NEPA scoping process summary report ²	5/11/2000	8/02/2000
NUREG/CR report -- summary and categorization of public comments	5/11/2000	8/02/2000
Subtask 2: Preparation of a DGEIS		

¹Time periods between drafts, revisions and finals include review periods by NRC staff.

²Final scoping process summary report shall include resolutions to comments.

Contractor's SF&C information package for cost/benefit analysis for TBC use in preparation of dose, cost, and inventory data & information

1 mo. after Task Order award

3 mos. after Task Order award

Update of SF&C for cost/benefit analysis

2 wks. after NRC TPM approval

4 wks. after NRC TPM approval

Conceptual assessment of regulatory alternatives

1/21/2000

2/04/2000

Preliminary assessment of rulemaking alternatives

5/15/2000

7/14/2000

Annotated outline for preliminary draft GEIS

8/15/2000

9/15/2000

Preliminary Draft GEIS

1/09/2001

5/22/2001

Subtask 3: Preparation of Draft RA

Draft RA

Concurrent with preliminary draft GEIS

Assistance in preparation of an FRN proposing clearance rule, SOC, and supporting documentation

Concurrent with revised draft GEIS

Subtask 4: Information/Collection Burden Report

IC Burden Report

Concurrent with preliminary draft GEIS

Concurrent with revised draft GEIS