

CW13201



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

May 10, 2000

Center for Nuclear Waste  
Regulatory Analyses (CNWRA)  
Attn: Wesley C. Patrick, President  
6220 Culebra Road  
PO Drawer 28510  
San Antonio, TX 78228-0510

SUBJECT: TASK ORDER NO. 009, ENTITLED "TECHNICAL SUPPORT FOR UPDATING OF PART 20 GUIDANCE FOR URANIUM RECOVERY FACILITIES UNDER CONTRACT No. NRC-02-98-002

Dear Mr. Patrick:

In accordance with the Section G.5, Task Order Procedures, of the subject contract, this letter definitizes Task Order No. 9. This effort shall be performed in accordance with the enclosed Statement of Work and the Contractor's technical proposal dated April 17, 2000, that is incorporated by reference and made a part of this task order.

Task Order number 9 shall be in effect from the May 15, 2000 through September 30, 2001, with a cost ceiling of \$143,228. The amount of \$128,608. represents reimbursable costs, the amount of \$4,331 represents the cost of facilities capital, and the sum of \$10,289 represent the fixed fee.

The obligated amount shall, at no time, exceed the task order ceiling. When and if the amount(s) paid and payable to the Contractor hereunder shall equal the obligated amount, the Contractor shall not be obligated to continue performance of the work unless and until the Contracting Officer shall increase the amount obligated with respect to this task order. Any work undertaken by the Contractor in excess of the obligated amount specified above is done so at the Contractor's sole risk.

This task order obligates funds in the amount of \$80,000 of which \$71,600 represents reimbursable costs, \$2,000 represents the cost of facilities capital, and \$6,400 represents the fixed fee. Accounting data for this task order is as follows:

B&R NO.:	05-015-305-105
JOB CODE:	J5220
BOC:	252A
APPN. NO.:	31X0200.060
FFS NUMBER:	5000R085
OBLIGATED AMOUNT:	\$80,000

Template = ADM-001

ADM02

The following individual is considered to be essential to the successful performance of the work hereunder: Mr. P. Mackin. The Contractor agrees that such personnel shall not be removed from the effort under the task order without compliance with the Contract Clause H.1 Key Personnel.

Your contacts during the course of this task are:

Technical Matters: Jayne Halvorsen, Project Officer, (301) 415-6001  
John H. Lusher, Technical Monitor, (301) 415-7694

Contractual Matters: Donald A. King, Contracting Officer (301) 415-6731

The issuance of this task order does not amend any terms or conditions of the subject contract.

Please indicate your acceptance of this task order by having an official, who is authorized to bind your organization, execute three (3) copies of this document in the spaces provided and return two copies to the U.S. Nuclear Regulatory Commission, Attn: Mr. Donald King, ADM/DCPM/CMB2, Mail Stop T-712, Washington, D.C. 20555. You should retain the third copy for your records.

If you have any questions regarding this matter, please contact me on (301) 415-6731, facsimile (301) 415-8157, or e-mail at DAK1@NRC.GOV.

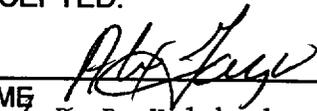
Sincerely,



Donald A. King, Contracting Officer  
Contract Management Branch No.2  
Division of Contracts and  
Property Management  
Office of Administration

Enclosure:  
As stated

ACCEPTED:

  
\_\_\_\_\_  
NAME R. B. Kalmbach  
Director, Contracts  
\_\_\_\_\_  
TITLE  
May 16, 2000  
\_\_\_\_\_  
DATE

## STATEMENT OF WORK

PROJECT TITLE: TECHNICAL SUPPORT FOR UPDATING OF PART 20 GUIDANCE FOR URANIUM RECOVERY FACILITIES

TYPE OF CONTRACT: Non Fee Recoverable  
NRC OFFICE: NMSS  
NRC PROJECT MANAGER: Jayne Halvorsen, 301-415-6001, jxh@nrc.gov  
NRC TECHNICAL PROJECT MANAGER: John H. Lusher, 301-415-7694, jhl@nrc.gov

### 1.0 Background

Many NRC guidance documents related to uranium recovery (UR) licensee compliance with 10 CFR 20 are out of date, due to: (1) changes to uranium recovery processes, including the general transition in the industry to in situ leach (ISL) extraction facilities; (2) the major revisions, in 1991, to 10 CFR 20; (3) advances in technical and scientific knowledge; and (4) changes to other (outside NRC) guidance. Examples include Regulatory Guide (RG) 3.46, *Standard Format and Content of License Application, Including Environmental Reports, for In Situ Uranium Solution Mining*, RG 4.14, *Radiological Effluent and Environmental Monitoring at Uranium Mills*, published in 1980, RG 8.30, *Health Physics Surveys in Uranium Mills*, published in 1983, and RG 8.31, *Information Relevant to Ensuring that Occupational Radiation Exposures at Uranium Mills Will Be ALARA*, also published in 1983 (only examples; there are many potentially relevant documents). In 1999 the staff updated Regulatory Guides 8.30 and 8.31. Since other NMSS Divisions are in the process of updating NRC guidance for their program areas of interest, the staff desires to have further review to determine what other NRC guidance requires update related to compliance with 10 CFR 20 for UR facilities. Then, the staff plans to update the guidance to comply with 10 CFR 20. This work is separate from the technical support to the Part 41 rulemaking effort.

### 2.0 Objective

the objective of this project is to update NRC guidance related to compliance with 10 CFR 20 for UR facilities. This will require that the Center for Nuclear Waste Regulatory Analyses (CNWRA) provide an appropriate number of qualified staff with knowledge and experience in operational and environmental health physics and familiarity with the technical and operational aspects of uranium recovery facilities, both conventional mills and ISLs.

### 3.0 Scope of Work

The CNWRA shall revise Part 20 guidance for uranium recovery facilities. This project will likely require substantial interactions between contractor staff and NRC staff; thus, an active dialogue shall be maintained between the CNWRA and NRC staff during development of the guidance revisions. The NRC may choose to make available on the Internet the proposed revisions to guidance, and CNWRA submittals shall be written and developed with this in mind.

The NRC intends to have the work on this task performed in separate phases beginning with Phase I. The remaining phases of the task will be addressed in later contract actions.

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## Phase 1

### Subtask A: Evaluate Existing Guidance

Develop a comprehensive list of the NRC's existing guidance on compliance with 10 CFR 20 by UR licensees, including at least the following: pertinent regulatory guides; staff technical positions; branch technical positions; standard review plans for UR facilities; external guidance documents, such as those of national and international radiation protection organizations, and consensus standards organizations; and any other pertinent guidance documents that are identified by contractor or NRC staff.

With agreement by the NRC staff, review the appropriate guidance documents from this list. Recommend, with justification, the general scope of changes (updating) that should be made to the identified NRC guidance documents. Develop priorities for accomplishing the recommended changes to NRC guidance documents.

### Subtask B: Develop Proposed Revisions

Propose conceptual changes to the NRC guidance documents. With agreement by the NRC staff, prepare draft revisions to guidance documents, with supporting documentation, as necessary, to justify the proposed changes. As current NRC policy favors the use of existing external standards and recommendations, proposed changes shall rely as much as reasonable on such existing external standards and recommendations. **The CNWRA shall not proceed with Phase 2 without written approval from the NRC Contracting Officer.**

It is anticipated that NRC will notify CNWRA within four weeks of the end of Phase I whether or not they will put Phase II into effect.

## Optional Phase 2

### Subtask C: Participate in Public Workshop

Should the NRC proceed with Phase 2, the CNWRA shall participate in a public meeting or workshop to discuss the proposed revisions to NRC guidance documents. Develop meeting materials such as overhead transparencies, handouts, and meeting agenda. Keep notes on proceedings of the public workshop, and produce a list of comments on the proposed revisions to NRC guidance documents. With the NRC staff, the CNWRA shall develop draft responses to the initial comments that are received by or shortly after the public workshop. **The CNWRA shall not proceed with Phase 3 without written approval from the NRC Contracting Officer.**

It is anticipated that NRC will notify CNWRA within four weeks of the end of Phase II whether or not Phase III will be put into effect.

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### Optional Phase 3

#### Subtask D: Prepare Draft Final Guidance Documents

Should the NRC proceed with Phase 3, the CNWRA shall, with the NRC staff, revise draft responses to comments, as necessary, and develop responses to additional comments that have been received. Prepare draft final guidance document(s), based on the proposed revisions, comments provided at the public meeting, and suggestions from NRC staff. The type of document to be produced will be determined by NRC staff. At this time the NRC staff plans to produce revisions to the individual guidance documents.

#### 4.0 Deliverables, Schedule, and Distribution

The deliverables and schedule are given in the following table. Timing for NRC review is also shown. The table also summarizes the required number of copies and distribution of reports and other materials submitted under this project. The NMSS Technical Project Manager (TPM) shall provide the performing organization with current NRC mailing addresses for this distribution.

Deliverable	Schedule	Distribution	
		PM	TPM
<u>Phase 1</u>			
Draft Task A report	1 month after Phase 1 start	1	1
NRC review of draft Task A report	1 month after report receipt		
Revised Task A report	1 month after NRC review	1	2*†
Draft proposed revisions to guidance (Task B)	6 months after Phase 1 start	1	1
NRC review of draft proposed revisions to guidance	1 month after report receipt		
Revised proposed revisions to guidance	1 month after NRC review	1	2*†
<u>Phase 2</u>			
Public meeting materials	1 month after Phase 2 start	1	1
Participate in public meeting	to be determined		
Comments and draft responses to initial comments	1 month after public meeting	1	1
<u>Phase 3</u>			
Draft responses to all comments	1 month after Phase 3 start	1	1
NRC review of draft responses to comments	1 month after report receipt		
Revised responses to comments	1 month after NRC review	1	2*†
Draft final guidance documents (Task D)	4 months after Phase 3 start	1	1
NRC review of draft final guidance documents	1 month after report receipt		
Revised final guidance documents	1 month after NRC review	1	2*†
<u>All Phases</u>			
Monthly Letter Status Report	20th day of subsequent month	1*	1
Meeting, workshop, or trip report ‡	3 weeks following event	1	1
* Original of report.			
† Camera-ready and electronic formats.			
‡ Only if necessary. No meetings, workshops, or trips needing reports are anticipated.			

The revised reports shall be furnished in hard copy (camera ready) and in electronic medium format. For electronic formats, the reports shall be provided in a format specified by the NRC staff; the expected format to be used is WordPerfect®, version 8.

### 5.0 Monthly Letter Status Reports

The CNWRA shall submit a Monthly Letter Status Report (MLSR) to the NRC every four week period in accordance with the monthly reporting requirements specified in the overall contract.

### 6.0 Estimated Period of Performance

The NRC staff plans to have the work performed in three separate phases, with the following completion schedules:

Phase 1: The task order shall be in effect from the award date of Task Order 9 to October 31, 2000.

Phase 2: Dependent on when Phase 1 is completed, this Phase 2 may be initiated in FY00, in which case the estimated completion is by November 2000. If it is predicted that the Phase 2 work cannot be completed by November 2000, the work of Phase 2 will be initiated in FY01, with completion before September 30, 2001.

Phase 3: This phase is planned for initiation in FY01, with completion by September 30, 2001.

### 7.0 Meetings and Travel

Teleconferences and videoconferences will be held as necessary. Use of e-mail and other Internet-based communication (e.g., ftp, world-wide web) is encouraged. Travel to the location of the public meeting or workshop will be necessary. The location of the public meeting is not determined at this time, but likely would be in Rockville, Maryland (2 persons/3 days). No other travel is anticipated.

### 8.0 NRC-Furnished Material

No specific materials have been identified that need to be furnished to the CNWRA.

### 9.0 CNWRA-Acquired Material

The CNWRA may need to acquire documents required to complete the tasks of the project. The CNWRA must notify the NRC, and the NRC must approve in writing, when acquisition of any capital or word-processing equipment or federal information processing (FIP) resources is anticipated.

### 10.0 Level of Effort

The NRC staff estimates the level of effort to be approximately 160 staff hours for Subtask A, 400 staff hours for Subtask B, 160 staff hours for Subtask C, and 300 staff hours for Subtask D, for a total effort of 1020 staff hours.

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## 11.0 Project and Technical Direction

The NMSS Technical Project Manager (TPM) is responsible for providing technical guidance to the performing organization regarding staff interpretations of the technical aspects of regulatory requirements, along with copies of relevant documents when requested by the performing organization. All work products must be reviewed and approved by the NMSS TPM before they are submitted as final documents. All technical directions given to the performing organization must be consistent with the work scope and schedule. The NMSS TPM is not authorized to unilaterally make changes to the approved work scope or schedule or give the performing organization any direction that would increase costs over approved levels. Changes in the work scope or schedule will be processed through the NRC Contracting Officer.