



APPENDIX A INDUSTRIAL/ACADEMIC/RESEARCH INSPECTION RECORD (IP 87110)									
REGION I									
Insp. Report #	<b>01-001</b>	License #	<b>37-23341-01</b>			Docket #	<b>030-20934</b>		
Licensee Name	<b>UniTech Services Group, Inc.</b>								
Street Address	<b>401 North Third Avenue</b>								
City, State, Zip	<b>Royersford, PA 19468</b>								
Location (Authorized Site) Being Inspected	<b>same as above</b>								
Licensee Contact Name	<b>Daniel R. Neely</b>				Phone #	<b>(610) 948-9700</b>			
Priority	<b>2</b>	Program Code	<b>03218</b>		Description	<b>Nuclear Laundry</b>			
Date of Last Inspection:		<b>3/23 -24/99</b>			Date of This Inspection		<b>2/28/01</b>		
Type of Insp.	Announced		Routine	<b>X</b>	Initial				
	Unannounced	<b>X</b>	Special						
Next Insp. Date	<b>3/03</b>	Normal	<b>X</b>	Reduced		Extended			
Justification for change in normal inspection frequency:		<b>This inspection (01-001) and previous inspection (99-001) were both clear. However, do not extend inspection interval, due to imminent change in method of release of effluents from sewer to river.</b>							
<b>Summary of Findings and Actions</b>									
No violations, Clear 591 or letter issued				<b>X</b>	Non-cited violations				
Violation(s), 591 issued		Violation(s), letter issued							
Follow up on previous violations:			<b>No previous violations</b>						
Inspector - Printed Name		<b>Pamela J. Henderson</b>							
- Signature		<b>/RA/</b>			Date	<b>3/2/01</b>			
Approved - Printed Name		<b>Betsy Ullrich</b>							
- Signature		<b>/RA/</b>			Date	<b>3/8/01</b>			

<b>PART I-LICENSE, INSPECTION, INCIDENT/EVENT, AND ENFORCEMENT HISTORY</b>		
<b>1.</b>	<b>AMENDMENTS AND PROGRAM CHANGES</b>	
License amendments issued since last inspection, or program changes noted in the license.		
Amendment No.	Date	Subject
17	1/5/00	Name change and change calibration frequency of radiation count and dose rate meters to annually
18	2/11/00	Test of a new liquid waste treatment method
19	2/17/00	Change to hose specification for liquid waste treatment method authorized by amendment # 18
20	5/9/00	Change to uranium bioassay program
<b>2.</b>	<b>INSPECTION AND ENFORCEMENT HISTORY</b>	
Unresolved issues; previous and repeat violations; Confirmatory Action Letters; and orders.		
<p><b>No open items. All violations identified in the 97-001 inspection were closed during the 99-001 inspection.</b></p> <p><b>99-001 Routine inspection. Clear</b></p> <p><b>98-001 Special site visit to review licensee's request to release effluent water to unrestricted areas. Clear</b></p> <p><b>97-001 Routine inspection. Three SL4 violations.</b></p> <p style="padding-left: 40px;"><b>20.1801 - Unsecured sealand container</b></p> <p style="padding-left: 40px;"><b>20.1904 - Unlabeled container of radioactive sludge</b></p> <p style="padding-left: 40px;"><b>Condition 18 - Failure to survey containers of contaminated items</b></p>		
<b>3.</b>	<b>INCIDENT/EVENT HISTORY</b>	
List any incidents or events reported to NRC since the last inspection. Citing "None" indicates that regional event logs, event files, and the licensing file have no evidence of any incidents or events since the last inspection.		

**None - Docket file and ADAMS checked - no evidence of incidents or events since the last inspection.**

**PART II - INSPECTION DOCUMENTATION**

NOTE: References that correspond to each inspection documentation topic are in Inspection Procedure 87110, Appendix B, "Industrial/Academic/Research Inspection References."

The inspection documentation part is to be used by the inspector to assist with the performance of the inspection. Note that not all areas indicated in this part are required to be addressed during each inspection. However, for those areas not covered during the inspection, a notation ("Not Reviewed" or "Not Applicable") should be made in each section, where applicable.

All areas covered during the inspection should be documented in sufficient detail to describe what activities and procedures were observed and/or demonstrated. In addition, the types of records that were reviewed and the time periods covered by those records should be noted. If the licensee demonstrated any practices at your request, describe those demonstrations. The observations and demonstrations you describe in this report, along with measurements and some records review, should substantiate your inspection findings. Attach copies of all licensee documents and records needed to support violations.

**1.**

**ORGANIZATION AND SCOPE OF PROGRAM**

Management organizational structure; authorized locations of use, including field offices and temporary job sites; type, quantity, and frequency of material use; staff size; delegation of authority.



**Dan Neely is the plant manager and Radiation Safety Officer and Mike Gerstner is the Health Physics supervisor. Mr. Gerstner handles the day-to-day radiation safety duties. Mr. Neely oversees the program.**

**The licensee is a large nuclear laundry which currently employs approximately 35 to 80 workers dependent upon workload (plant outages). The licensee operates two shifts in Spring and Fall operating from 10:30 pm to 5:30 pm, 6 days a week. During Winter and Summer the licensee operates on one shift. Clients include 16 nuclear power plants, Newport News Naval Shipyard, Batelle and Brookhaven. Radiation safety staff includes 2 full time technicians, one on each shift.**

**The licensee picks up, launders/decontaminates and returns client clothing and other related items used by radiation workers at nuclear facilities. Workload, based on plant outages, varies from 25,000 lbs to 100,000 lbs per week. The licensee also cleans and recertifies respirators although this service has reduced dramatically. Due to Part 20 changes, most clients are choosing not to use respirators. For all of 2000, the licensee serviced approximately 100 respirators. The license also authorizes temporary job sites (i.e. mobile laundry operation), but this unit has not been used in many years.**

**Recently UniTech received an easement from a nearby property owner whose property is located between the licensee's facility and the river. UniTech plans to begin work soon on a pipeline to go under the adjacent RR tracks and the next property, to get to the river. This will allow them to discharge liquid effluent directly to the river (unrestricted area). Currently the licensee discharges liquid effluent to the sanitary sewer which goes to the Royersford Wastewater Treatment Facility (RWTF) where releaseable levels of radioactive material in the effluent have been concentrating.**

**The licensee expects to receive their Phase I permit from PADEP and the Delaware River Basin Authority at any time for the pipeline. They expect pipeline construction to take place in May or June 2001 with a mid-summer connection. At that time, they expect to begin Phase II (use and monitoring).**

**Amendment No. 18 to the license permitted the licensee to test a new reverse osmosis waste water treatment system. The licensee did the testing in February/March 2000 and was pleased with the results but have not made a decision to have the system installed. They have several other vendors with similar systems that they may request to test in the future.**

2.	<b>MANAGEMENT OVERSIGHT</b>
Management support to radiation safety; Radiation Safety Committee (RSC); Radiation Safety Officer (RSO); program audits, including annual reviews of program and as low as is reasonably achievable (ALARA) reviews; control by authorized users.	
<b>See management structure in section 1. The licensee's programs is audited annually by UniTech corporate staff. The inspector reviewed audits for 1999 and 2000. The audit includes compliance with in-plant air as well as discharge air and water limits, DOT compliance, survey instruments, personnel dosimetry/bioassay, training, contamination control, posting, and labeling as well as many industrial hygiene areas. Infractions are identified and formally addressed and corrected.</b>	
3.	<b>FACILITIES</b>
Facilities as described; uses; control of access; engineering controls; calibration facilities; shielding; air flow:	

Facilities as described. The inspector toured the grounds including walking the fence line and determined that the restricted area was secured. According to the licensee, they walk and inspect the fence line daily. Once a month they verify the condition of the fence and check locks and overhead doors. The inspector observed that doors into the facility were locked. New fencing has replaced existing fencing in some areas and will replace all existing fencing in the near future. At the rear of the property, the inspector noted small gaps at the bottom of some of the new fencing where a wire that should run through the bottom edge of the fence was missing, leaving the fencing less rigid. In addition, the inspector noted that erosion under the fencing is a concern at the rear of the property since the ground slopes down from the fence line. There was no evidence that security had been breached. The inspector also noted that old fencing had a barbed wire top while the new fencing did not. During the inspection, the licensee contacted the fencing contractor and arranged to have the wire installed at the bottom edge of the fence where it is missing and decided to have barbed wire installed at the top of the new fencing.

Air flow at the facility is generally from clean to contaminated areas. As a result of the license's 2000 audit, a series of tests were performed and no major fluctuations were detected, however, the licensee noted that there was a slight advantage in creating a negative flow environment when the dock doors are closed. Operations now require that dock doors be closed as much as possible. Personnel who control dock doors were instructed.

4.

**EQUIPMENT AND INSTRUMENTATION**

Operable and calibrated survey equipment; procedures; 10 CFR Part 21.

Amendment No. 17 permitted the licensee to change from a calibration frequency of every six months to annually. The licensee is still calibrating semi-annually. All instruments viewed by the inspector (loading dock, HP lab, portals) had been calibrated by the manufacturer or by the licensee following the manufacturer's instructions within the last six months.

5.

**MATERIAL USE, CONTROL, AND TRANSFER**

Materials and uses authorized; security and control of licenses materials; and procedures for receipt and transfer of licensed material.

**Containers/packages are received in trailers or if laundry is within a sealand container, the sealand container is considered the container/package.**

**When the trailer or sealand container arrives by truck and before it is permitted to dock at the facility, the licensee conducts a dose rate survey at contact and at 2 meters. In addition, contamination surveys are taken inside the back door of the trailer or sealand container. The licensee waits for the results of the contamination survey before the trailer/sealand is backed up to the loading dock.**

**Each container from trailers and each bag from sealand containers is surveyed for radiation levels. If a bag or container reads > 30 mR/hr it is held for return to the client. According to the licensee, they return containers/bags to clients approximately 4-5 times a year due to dose rates >30 mR/hr. Other bags and containers are sorted by dose rate (0-5 mR/h, 5-10 mR/hr and >10<30 mR/hr). According to the licensee, 95% of their containers/bags fall into the 0-5 mR/hr category.**

**For outgoing shipments, the licensee essentially does the reverse process. A pre-load contamination survey is done on all outgoing trailers/sealand containers. Outgoing containers/packages are smeared, a dose rate survey is conducted. Labeling on the container/package is completed and it is loaded into the trailer/sealand for transport.**

6.

**AREA RADIATION SURVEYS AND CONTAMINATION CONTROL**

Radiological surveys; air sampling; leak tests; inventories; handling of radioactive materials; contamination controls; records; and public doses.

**Contamination - daily radiation and contamination surveys are conducted in all contaminated and potentially contaminated areas. The inspector reviewed daily surveys from 1/2/01 to 2/19/01. The licensee surveys demonstrate that levels/contamination is generally below their actions levels. When when an area is found to be above the action level, the licensee documents decontamination efforts. Non-contaminated areas such as office space, lunch room are monitored weekly. Exit from the restricted area is through a portal monitor.**

**Waste water, workplace air and air effluent measurements are compared against the limits for the most restrictive isotopes that may be present during the sampling period. The most restrictive isotopes are dependent upon the customers that are serviced during the time period being sampled but generally are Am-241 or Pu-239 for alpha and Sr-90 or Co-60 for beta.**

**Waste Water - gross alpha and beta are checked before each discharge which is often several times daily, a monthly gamma spec and quarterly composite is done for hard to measure and pure beta emitters. Alpha spec and solubility are done annually. The licensee's action levels are 10% of the Part 20 limits for water effluent release. These are more conservative limits than the release criteria for sewer releases which is the licensee's current method of waste water disposal. The inspector reviewed the licensee's surveys from 10/00 - 2/16/01. Alphas are rarely above the 10% limit however, betas occasionally exceed the 10% limit. The licensee tracks the monthly average concentration for sewer release in table 3 of Appendix B to Part 20 and alpha and beta are well below these limits. The inspector discussed the impact of their current monitoring and tracking and the change from sewer disposal to disposal to the river (unrestricted area). Although the current discharge is well below the limits for unrestricted release (table 2, column 2 of Appendix B to Part 20) for water effluent, they may need to reexamine their action limits.**

**The inspector reviewed the results of the 4<sup>th</sup> quarter waste water analysis by Eberline-Oak Ridge. The results support that the licensee is below the release limits for water effluent in Part 20 with most nuclides below 10% of the limit.**

**Workplace air sampling -The licensee obtains daily air samples from 12 locations within the plant; 5 near the sorter, 4 near the washers and 3 near the dryers. Weekly samples are taken on the production floor, some of the automatic laundry monitors, the packing room, tank room, air handling room, HP lab, lamella room, respirator room and leased clothing areas. Samples are analyzed for gross alpha and beta and compared against action level of 10% of DAC for the most restrictive isotopes. The inspector reviewed daily and weekly area air sampling from 10/00 - 2/11/01. The licensee's measurements indicate that levels of radioactive material in workplace air are well below 10% of the DAC.**

**Air Effluent originates from the exhaust from the sorting tables and dryers into one discharge stack. Isokinetic sampling is performed on the air effluent from the discharge stack. Samples are exchanged weekly and analyzed for gross alpha and beta; a composite is done quarterly for gamma spec. As with workplace air sampling, the results are compared against the most restrictive isotopes dependent upon the customers being served during the respective sampling period. The licensee's action levels are 10% of the Part 20 limits for air effluent release. The inspector reviewed weekly effluent air sampling results from 10/00 - 2/11/01. The licensee's measurements indicate that levels of radioactive material in air effluent are well below 10% of the Part 20 limits.**

**The inspector reviewed the results of the licensee 4<sup>th</sup> quarter composite analysis for gamma spec in air effluent. This analysis is performed by the licensee's Springfield Massachusetts facility. The results support that the licensee is releasing less than 10% of the limits in Part 20.**

**The inspector reviewed the licensee's procedure and equipment for air sampling. UniTech sends a flow rate calibrator unit, an AFC-100LP by HiQ Environmental Products, to the manufacture annually for calibration. This unit is then used to check the flow rate in the licensee's rotameters. The licensee then calculates the true flow rate taking into account temperature, pressure and altitude. The workplace air samplers are controlled at a central point where time on and off is measured.**

**Air flow in rotameters for workplace air sampling is maintained at approximately 40 lpm. Placement of workplace air samplers appeared appropriate. Air flow in the rotameter for air effluent sampling is maintained at approximately 90 lpm. The effluent sampler is positioned in the stack prior to discharge from the facility.**

**The licensee performs public dose assessment by placing quarterly TLD's at and beyond their fence line. The inspector reviewed the results of the TLD monitoring. Some of the area monitors at the fence line accumulate exposures exceeding 100 mrem/year. However, an individual member of the public is not likely to be present in these areas for more than a brief time. The licensee does calculations using a conservative 25% occupancy factor and for one area (opposite waste water processing building) a 20% occupancy factor. The calculations indicate exposures below 100 mrem/year.**

**According to the licensee, they do not possess any sealed sources that require leak testing.**

7.	<b>TRAINING AND INSTRUCTIONS TO WORKERS</b>
Training and retraining requirements and documentation; interviews and observations of routine work; staff knowledge of all routine activities; 10 CFR Parts 19 and 20 requirements; emergency situations; and supervision by authorized users.	

Training is provided to workers by the licensee (Steve Hoffman, Assistant Manager). Training takes approximately 6 hours to complete and includes approximately 1 hour on general radiation safety. Trainees take a non graded exam following completion of training. Instructor goes over the missed questions with the trainee and determines if the trainee's knowledge is sufficient to allow them to begin work. New workers work with an experienced worker prior to working alone. Retraining is conducted annually.

During the course of the inspection, the inspector interviewed a dock worker, a sorter and the supervisor of leased clothing inventory. Individuals interviewed were knowledgeable of radiation safety requirements. Each individual stated they had most recently received refresher radiation safety training in January 2001. The inspector reviewed records of worker training for these three individuals. Records reviewed indicated that each of the workers had been retrained annually as required. Two individuals had received additional job specific radiation safety training in addition to the annual refresher training.

Due to changes in workload, the licensee has a large worker turnover. A significant portion of their labor force is temporary. To ensure that workers are properly trained, the licensee requires that if an employee is terminated and rehired more than 3 weeks later, that employee must repeat the entire training.

8.

**RADIATION PROTECTION**

Radiation protection program with ALARA provisions; external and internal dosimetry; exposure evaluations; dose and survey records and reports; annual notifications to workers; bulletins and other generic communications.

The license monitors external exposure using quarterly TLD badges provided by ICN. The inspector reviewed the results of monitoring for 1999 and 2000. The highest doses received were to clothes sorters: 1999 - 439 mrem and for 2000 - 298 mrem. These doses seem reasonable since clothes sorters have the closest contact with contaminated clothing. These individuals empty containers/bags from clients and "sort" contaminated clothing prior to any cleaning. Washroom employees also tend to get higher exposures at the facility. These employees load contaminated clothing into the washers.

The licensee performs internal dosimetry for Cobalt-60. Chest counts are performed before beginning duties, quarterly, when high air samples are detected in workers area, when facial contamination is detected and at termination of employment. According to the licensee, no uptakes have been detected, therefore they have not been required to sum dose. The licensee uses a NaI detector with a scaler to take measurements. The system is checked with a phantom and a known source of Cobalt-60. The action level is 10% of the ALI for Cobalt-60. The inspector reviewed the 3<sup>rd</sup> and 4<sup>th</sup> quarter bioassay results. Measurements did not vary significantly from background and thus did not exceed 10% of the ALI. The inspector also checked 3<sup>rd</sup> and 4<sup>th</sup> quarter bioassay records and determined that the three individuals who had been interviewed during the course of the inspection had been bioassayed as required.

The licensee's amendment No. 20 changed their uranium bioassay program to require bioassay only when contaminated clothing is received from customers who would normally be required to implement such a program for their employees, i.e., uranium mills or fuel fabrication facilities. Since the Royersford facility does not have any customers that are required to implement a uranium bioassay program, uranium bioassay is not performed.

The licensee sends annual notification of dose to each employee and also provides dose information on request of employees.

9.	<b>RADIOACTIVE WASTE MANAGEMENT</b>
<p>Disposal; effluent pathways and control; storage areas; transfer; packaging, control, and tracking procedures; equipment; incinerators, hoods, vents and compactors; license conditions for special disposal method.</p>	
<p><b>The licensee's solid waste typically consists of dry lint collected from dryers, dewatered lint filtered from water from the washers and pressed in a lamella (sludge press) to form a sludge, and damaged clothing. Highest exposure rates are from drums of dewatered lint (sludge) which measured 30 mR/hr at the surface at the time of the inspection. Dry lint and damaged clothing are stored in a locked sealand container stored outside the licensee's building and within the fence line. Dewatered lint is stored in the basement of the facility. According to the licensee, they ship approximately 1 sealand container for disposal per year.</b></p> <p>See section 6 for air and water effluent.</p>	
10.	<b>DECOMMISSIONING</b>
<p>Records relevant to decommissioning; decommissioning plan/schedule; notification requirements; cost estimates; funding methods; financial assurance; and Timeliness Rule requirements; changes in radiological conditions since decommissioning plan was submitted.</p>	
<p><b>Records are stored at the licensee's corporate office. The licensee does plant specific calculations for financial assurance for the Royersford plant. Financial assurance is under one instrument for all UniTech plants in NRC jurisdiction.</b></p>	
11.	<b>TRANSPORTATION</b>
<p>Quantities and types of licensed material shipped; packaging design requirements; shipping papers; hazardous materials (HAZMAT) communication procedures; return of sources; procedures for monitoring radiation and contamination levels of packages; HAZMAT training; and records and reports.</p>	

Laundry and waste is transported almost entirely as LSA exclusive use shipments, remaining shipments such as waste are limited quantity.

Hazmat training is provided as required. The inspector reviewed training records of the dock worker who was interviewed during the course of the inspection and determined that he received Hazmat training on 1/28/01.

See also section 5.

<b>12.</b>	<b>NOTIFICATIONS AND REPORTS</b>
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Reporting and followup of theft; loss; incidents; overexposures; change in RSO; authorized user; and radiation exposure reports to individuals.

None.

<b>13.</b>	<b>POSTING AND LABELING</b>
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Notices; license documents; regulations; bulletins and generic information; posting of radiation areas; and labeling of containers of licensed material.

**The inspector observed the required postings at the facility near portal monitors and in the employee lunch room. All containers/packages of radioactive materials observed were labeled as required. Areas were posted as required.**

<b>14.</b>	<b>INDEPENDENT AND CONFIRMATORY MEASUREMENTS</b>
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Areas surveyed, both restricted and unrestricted, and measurements made; comparison of data with licensee's results and regulations; and instrument type and calibration date.

**The inspector performed independent measurements at the licensee's facility using a Ludlum 14C with thin end window, calibration date July 13, 2000, NRC tag 033509.**

**Background radiation levels at the facility measured 0.02-0.03 mR/hr.**

**Surface of a dry lint collector in the production area 0.3 -0.7 mR/hr.**

**Sorting room clothing and mop heads 0.5 mR/hr.**

**Pipes of slurry pump in lamella room 0.9 mR/hr**

**Drum containing dewatered lint (sludge) in lamella room 30 mR/hr at surface.**

**Wash water troughs 3-7 mR/hr.**

**Wash water lint collector in trough 10 mR/hr.**

**Surface of truck holding shipment of clothing to client 0.1-0.3 mR/hr**

<b>15.</b>	<b>VIOLATIONS, NON-CITED VIOLATIONS (NCVs), AND OTHER SAFETY ISSUES</b>					
State requirement and how and when licensee violated the requirement. For NCVs, indicate why the violation was not cited. Attach copies of all licensee documents needed to support violations.						
<b>No violations identified.</b>						
<b>16.</b>	<b>PERSONNEL CONTACTED</b>					
Identify licensee personnel contacted during the inspection (including those individuals contacted by telephone). Use # to indicate individual present at entrance meeting. Use * to indicate individual present at exit meeting.						
	<b>Name</b>	<b>Title</b>	<b>Phone No.</b>	<b>In Person or By phone</b>		
	<b>Glenn Roberts</b>	<b>Corporate Health Physicist</b>	<b>(610) 948-9700</b>	<b>In Person</b>		
	<b>Daniel Neely</b>	<b>Plant Manager/RSO</b>	“ ” “	“ ”		
	<b>Michael Gerstner</b>	<b>Health Physics Supervisor</b>	“ ” “	“ ”		
	<b>Harry Linderman</b>	<b>Dock Worker</b>	“ ” “	“ ”		
	<b>Pat Szilli</b>	<b>Sorter</b>	“ ” “	“ ”		
	<b>Anthony Valeriano</b>	<b>Lease Inventory Supervisor</b>	“ ” “	“ ”		
<b>17.</b>	<b>PERFORMANCE EVALUATION FACTORS</b>					
A.	Lack of senior management involvement with the radiation safety program and/or RSO oversight.		Y		N	X
B.	RSO too busy with other assignments.		Y		N	X
C.	Insufficient staffing.		Y		N	X
D.	RSC fails to meet or functions inadequately.	N/A	X	Y		N

E.	Inadequate consulting services or inadequate audits conducted.	N/A		Y		N	X
<b>REMARKS</b> :(Consider the above assessment and/or other pertinent Performance Evaluation Factors (PEFs) with regard to the licensee's oversight of the radiation safety program)							
<b>18.</b>	<b>SPECIAL CONDITIONS OR ISSUES</b>						
NONE		Special license conditions; year-2000 effects of computer software and embedded systems.					
<b>Special conditions covered in other sections of this record.</b>							
<b>PART III - POST- INSPECTION ACTIVITIES</b>							
<b>1.</b>	<b>REGIONAL FOLLOWUP ON PEFs</b>						
<b>2.</b>	<b>DEBRIEF WITH REGIONAL STAFF</b>						
Post-inspection communication with supervisor, regional licensing staff, Agreement State Officer; and/or State Liaison Officer.							
<b>Supervisor notified of results of inspection.</b>							
<b>3.</b>	<b>YEAR-2000 ISSUES</b>						
Convey, to the NMSS Year-2000 Coordinator, all year-2000 licensee-identified problems and corrective actions taken.							

**TO ADVANCE TO NEXT SECTION OF FORM - PUSH PAGE DOWN KEY**

<b>APPENDIX A - ATTACHMENT A DECOMMISSIONING TIMELINESS INSPECTION</b>								
Licensee:	UniTech Services Group, Inc.			Date of Inspection:	2/28/01			
<b>1.</b>	<b>COMPLIANCE WITH DECOMMISSIONING TIMELINESS RULE</b>							
(NOTE: Repeat the answers given in Section 12 of the main body of the inspection record. The issues in subsequent sections are dependent on the answers to these questions.)								
	A.	License to conduct a <i>principal activity</i> <u>has</u> expired or been revoked:	Y		N	<b>X</b>		
	B.	Licensee <u>has</u> made a decision to permanently cease <i>principal activities</i> at the entire site, or any separate buildings, or any outdoor areas, including inactive burial grounds:	Y		N	<b>X</b>		
	C.	A 24-month duration has passed in which no <i>principal activities</i> have been conducted under the license at the site, or at any separate buildings, or any outdoor areas, including inactive burial grounds:	Y		N	<b>X</b>		
	D.	If "Yes" to either A or B or C above:						
	(1)	Identify Site/Bldg./Area:						
	(2)	Date of occurrence of A, B, or C:						
<b>2.</b>	<b>NOTIFICATION REQUIREMENTS</b>							
	A.	Licensee has provided written notification to U.S. NRC within 60 days of the occurrence of 1.A., 1.B., or 1.C. above.	Y		N			
	If "Yes," date of notification:							
	B.	If the licensee is requesting to delay initiation of the decommissioning process, the licensee <u>has</u> provided written notification to NRC within 30 days of occurrence of 1.A., 1.B., or 1.C. above:	N/A	Y	N			
	If "Yes," date of notification:							
Basis for Findings:								
<b>3.</b>	<b>DECOMMISSIONING PLAN/SCHEDULE REQUIREMENTS</b>							

	A.	Licensee is required to submit a decommissioning plan per 10 CFR 30.36(g), 40.42(g), 70.38(g), or 10 CFR Part 72?						
			N/A		Y		N	
	If "No" to 3.A., answer the following items B - F:							
	B.	The decommissioning work scope is covered by current license conditions.		Y			N	
	C.	Decommissioning has been initiated within 60 days of notification to NRC, or NRC has granted a delay.		Y			N	
	D.	If licensee has initiated decommissioning, give date the decommissioning was initiated:						
	E.	If decommissioning has been completed, it was completed within 24 months of notification to NRC.	N/A		Y		N	
	F.	If decommissioning is still scheduled to be completed, it is on schedule to be completed within 24 months of notification to NRC.						
			N/A		Y		N	
Basis for Findings:								
	If "Yes" to 3.A., answer the following items G - J:							
	G.	The decommissioning plan has been submitted to NRC within 12 months of notification.		Y			N	
	If "Yes," date of submittal:							
	If NRC approved, date of NRC approval:							
	H.	Has the licensee submitted an alternative schedule request?		Y			N	
	If "Yes," date of submittal:							
	I.	If decommissioning has been completed, it was completed within 24 months after approval of the decommissioning plan.	N/A		Y		N	
	J.	If decommissioning is still scheduled to be completed, it is on schedule to be completed within 24 months after approval of the decommissioning plan.						
			N/A		Y		N	
	Basis for Findings:							
Violations identified, if any:								

END