

June 27, 2001

MEMORANDUM TO: Lawrence E. Kokajko, Section Chief
Risk Task Group
Office of Nuclear Material Safety and Safeguards

FROM: Candice M. Drummond, Chemical Engineer */RA/*
Risk Task Group
Office of Nuclear Material Safety and Safeguards

SUBJECT: Summary - Stakeholder Meeting to Discuss Case Study on the Use of
Risk Information in Uranium Recovery

The purpose of the meeting was to communicate to stakeholders the status of the case study; receive early feedback and comments from stakeholders before continuing with the case study; and solicit from stakeholders comments or insights regarding the use of risk information in the NRC's regulation of uranium recovery. The referenced meeting was held in Denver, Colorado on June 13, 2001. The meeting was noticed in the Federal Register (66 FR 2010, January 10, 2001).

The meeting transcript, attendance list, the presentation slides and meeting handouts are attached.

Summary:

On June 13, 2001, the Risk Task Group held a public meeting to discuss its case study on uranium recovery. The meeting's objectives were (1) to discuss testing of draft screening criteria and development of safety goals through the case study, and (2) to solicit recommendations and comments on how NRC should proceed with the case study, apply the draft screening criteria, develop safety goals, and incorporate risk information into its regulatory program. Thirty-six stakeholders attended the case study meeting.

Meeting attendees provided feedback on the case study and the use of risk information. Some meeting attendees questioned the purpose and direction of the case studies. Remarks were made by external stakeholders that a risk-informed, performance-based approach would benefit part 40 licensees. One attendee suggested that the scope of the uranium recovery case study may be too broad. Some participants expressed the need for the NRC to consider chemical risk to the public and worker. One stakeholder suggested that the chemical industry's methodology of conducting a risk assessment may be applicable to the nuclear material arena. It was also recommended that the NRC consider using the Integrated Safety Analysis (ISA) approach for assessing risk in the uranium recovery area. An attendee stated that the real risks are those not necessarily related to radiological hazards, such as transportation and chemical risks.

The stakeholders made inquiries about the draft screening criteria. One stakeholder commented on screening criteria 4, stating it may be difficult to communicate the results of a risk assessment that used a probabilistic approach, and that the NRC needs to be able to translate the results appropriately. Another stakeholder recommended that we keep a record of what activities fail the screening criteria because if criteria 5 never eliminates an activity we may not have a need for that criterion. In addition, a stakeholder commented on the five-step process outlined in SECY 99-100. They recommended that we should have the tools in place before the implementation step so that the staff can effectively employ a risk-informed approach in the field.

Remarks were made to consider using ALARA as a safety goal in the uranium recovery area. A meeting attendee recommended that we look into whether risk is just the technical risk or hazard; or is risk broader, which may include an outrage factor and how do we factor that into our risk-informed decision making process. In contrast, another stakeholder questioned whether we should be concerned about the societal benefits or public perception at this stage in the process.

The staff emphasized that the objectives of the case studies are to test the draft screening criteria, examine the feasibility of safety goals, gain insights on how the materials and waste regulatory processes could be risk-informed, and identify the implementation tools needed. In response to a comment about the value of this effort, the staff explained that if NRC can establish safety goals (i.e., define "how safe is safe enough") for the waste and materials arenas, then both NRC and the licensee can have a benchmark for determining how to apply their respective programs. An NRC stakeholder also commented that, at a minimum, the payback of NRC's risk initiative to the licensee, and more broadly to the American public, is that it should lead the NRC license reviewer or inspector to focus on those items that contribute significantly to risk.

The staff emphasized that no decisions or final conclusions have been made on the case study, and that the staff would consider the stakeholders' feedback.

Attachments:

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2. Attendance list
3. Presentation slides
4. Meeting handouts
 - Agenda
 - Case Study Plan

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