

August 16, 2002

LICENSEES: Saxton Nuclear Experimental Corporation (SNEC) and GPU Nuclear, Inc. (GPU)

FACILITY: Saxton Nuclear Experimental Facility (SNEF)

SUBJECT: SUMMARY OF MEETING BETWEEN THE SNEC, GPU AND NRC STAFFS

On June 21, 2002, representatives of the NRC staff met at NRC Headquarters in Rockville, Maryland, with representatives of the SNEC and GPU, the licensees for the SNEF. Attachment one is a list of meeting attendees. Attachment two are the slides used by the licensees during the meeting. Attachment three is a calculation from the licensees concerning the SNEC radionuclide list that was given to the NRC staff during the meeting.

The plant was operated between 1962 and 1972, and it was shut down in May 1972. In February 1975, the plant was placed in SAFSTOR until 1986, when phased dismantlement began with the removal of the support buildings, contaminated soil, and some materials in the containment. The licensees' decommissioning plan became the Post-Shutdown Decommissioning Activities Report. The resubmitted License Termination Plan (LTP) was accepted for detailed technical review in March 2000.

Technical review of the LTP has generated requests for additional information (RAI). This meeting was scheduled to discuss (1) follow up on issues raised during the May 22, 2002, meeting with the licensees about health physics issues, (2) the process for changing pages in the LTP based on the results of discussions from meetings, (3) NRC staff review of information that the licensees presented to the NRC in their response to RAI1 (RAI dated August 18, 2000, from the NRC), and (4) issues from continuing NRC staff review of the LTP. Discussion topics for the meeting were forwarded to the licensees in a letter from the NRC dated June 14, 2002 (ADAMS accession no. ML021620587). The discussions with the licensees' technical staff and consultants provided clarification and a better understanding of the site specific technical data and related information.

Issues related to the Environmental Assessment were discussed. The Environmental Assessment requires consultations with appropriate State agencies to evaluate any potential environmental impacts of the proposed action. In 2000 and 2001, SNEC requested a Pennsylvania Natural Diversity Inventory (PNDI) screening for the proposed action. PNDI is a site specific information system that identifies significant natural resources of Pennsylvania. The results of the PNDI are valid for only one year.

For the 2000 and 2001 results, no impact on plants or natural communities was anticipated. In 2002, the Pennsylvania Department of Conservation and Natural Resources (DCNR) contacted SNEC and stated that the decision of "no anticipated impacts" to potential species in the 2000 and 2001 reviews were incorrect. Additionally, DCNR requested a survey for species of concern to be conducted by a qualified botanist for the 2002 review. In response, SNEC contacted DCNR and submitted photos of the project site, requested reevaluation of the impact to the species of concern, and explained the decommissioning process. On June 17, 2002, the

DCNR revised their decision and responded that they no longer anticipate an impact to the species of concern. As discussed, formal documentation summarizing the consultation process will be submitted to NRC by the licensees.

Several health physics issues were discussed. The first was an update of health physics discussion issues from the May 22, 2002, meeting with the licensees.

The licensees reiterated that the LTP would be revised to reflect the health physics issues resolved with staff at the May 22, 2002, public meeting. The licensees indicated that they would include in the LTP an appropriate license condition listing those changes to the LTP that would require a license amendment from NRC prior to being changed. Regarding the use of "Two Stage or Double Sampling" in final status surveys, the NRC staff stated that the LTP needs to indicate those survey units where this method may be used to show release criteria compliance.

The licensees explained that the off-site laboratory results for the containment vessel (CV) saddle area had been received and were now being reviewed. When the review is completed, the licensees will provide the lab results to the NRC staff.

The NRC staff suggested that all groundwater data (e.g., radionuclide analysis and water level measurements) for approved monitoring wells be provided as an appendix to the LTP. The format of this appendix was briefly discussed.

The NRC staff indicated that the LTP need only summarize the subsurface soil and water sample data used to classify the region under the CV as non-impacted since the data indicates no presence of residual contamination. Also, the licensees agreed to provide separately for NRC staff review, the analytical results for the more than 900 samples taken to support the non-impacted classification. The NRC staff explained that the LTP needs to include figures that clearly indicate the boundary of the non-impacted region under the CV and locations of the CV tie down anchors, grout curtain, CV angle well, and surrounding wells (i.e., annulus and bedrock). The depth of these structures should also be provided.

At the May 22 meeting, the licensees provided a table of transuranic/hard to detect nuclide data for solid and liquid samples that covered the period from 1994 to 2002. The licensees also explained that data missing for 1996 to 1999 was previously provided to the NRC in a separate report. Subsequently, the licensees asked that the NRC staff provide guidance at the next public meeting on how the previous data is to be included in the table. The NRC staff has now provided such guidance; the pertinent sample data from the report should be summarized with appropriate footnotes and included in the table.

The second health physics issue discussed was recommended changes to LTP Chapters 2, 3, and 5. In the NRC letter "Discussion Topics for June 21, 2002 Meeting," dated June 14, 2002, the staff suggested changes to specific sections in Chapters 2, 3, and 5. In general, the licensees agreed to make the changes as suggested. Regarding Section 2.5, "QA Procedures," page 2-18, the NRC staff clarified that the intent of this question was to revise the LTP to discuss how survey data from prior remediation projects involving soil and the removed support buildings was considered when developing the data quality objectives for the current decommissioning. For Section 5.2.3.2.4, "Gross Activity DCGLs," page 5-8, the licensees

indicated that showing compliance for smooth surfaces (e.g., concrete) that had been aggressively scabbled to remove contamination would likely involve a combination of surface and volumetric DCGLs as opposed to the some other modeling approach (e.g., MicroShield). Concerning Section 5.2.7.6, "SNEC Facility Sample Analysis," page 5-19, the licensees indicated that professional judgement is used to select additional samples for analysis of transuranic/hard to detect nuclides, in addition to the systematic transuranic/hard to detect nuclide analysis done for every twentieth sample analyzed. For Section 5.5.3.6, "Hard-To-Detect Radionuclides," pages 5-38 and 39, the licensees explained that use of the EPRI report is no longer an issue since site specific radionuclides of concern will be identified.

Finally in the area of health physics, the licensees response to question 22/RA11 "Resurvey," was discussed. The licensees agreed to make the changes as suggested by the NRC staff in the NRC letter "Discussion Topics for June 21, 2002, Meeting," dated June 14, 2002.

There was a brief discussion about dose modeling. The licensees provided documentation (attachment three) regarding the de-selection of radionuclides. The licensees will follow-up with their off-site analytical laboratory to assess the adequacy of the gamma spectroscopy routine used to identify specific radionuclides.

Future public meetings will be held to discuss the remaining issues on pathway analysis and submission of the revised LTP.

/RA/

Alexander Adams, Jr., Senior Project Manager
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Office of Nuclear Reactor Regulation

Docket No. 50-146

Attachments: As stated

cc w/attachments: Please see next page

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Docket No. 50-146

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**MEETING BETWEEN THE NRC STAFF AND
THE SAXTON EXPERIMENTAL CORPORATION**

June 21, 2002

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Concerning Section 5.2.7.6, "SNEC Facility Sample Analysis," page 5-19, the licensees indicated that professional judgement is used to select additional samples for analysis of transuranic/hard to detect nuclides, in addition to the systematic transuranic/hard to detect nuclide analysis done for every twentieth sample analyzed. For Section 5.5.3.6, "Hard-To-Detect Radionuclides," pages 5-38 and 39, the licensees explained that use of the EPRI report is no longer an issue since site specific radionuclides of concern will be identified.

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