

APPENDIX B

GUIDANCE TO THE U.S. NUCLEAR REGULATORY COMMISSION STAFF FOR REVIEWING HISTORICAL ASPECTS OF SITE PERFORMANCE FOR LICENSE RENEWALS AND AMENDMENTS

For license renewals and amendments, the historical record of site operations contains valuable information for evaluating the licensing actions. Following are specific areas in which a compliance history or record of site operations and changes should be presented for review:

- Amendments and changes to operating practices or procedures.
- License violations identified during U.S. Nuclear Regulatory Commission (NRC) or Agreement State site inspections.
- Cleanup histories or status.
- Exceedances of any regulatory standard or license condition pertaining to radiation exposure, contamination, or release limits.
- Exceedances of any regulatory standard or licenses condition pertaining to non-radiation contaminant exposure or release limits.
- Changes to any site characterization information important to the evaluation of the reclamation plan, such as changes to site location and layout, uses of adjacent lands and waters, meteorology, seismology, the geologic or hydrologic setting, ecology, background radiological or non-radiological characteristics, and other environmental features.
- Results of site operations such as data on radiological and non-radiological effects, accidents, and the economic effects of operations.
- Changes to factors that may cause reconsideration of alternatives to the proposed action.
- Changes to the economic costs and benefits for the facility since the last application.

If, after reviewing these historical aspects of site operations, the staff concludes that the site has been operated so as to protect health, safety, and the environment, and that no unreviewed safety-related concerns have been identified, only those changes proposed by the license renewal or amendment or application should be reviewed, using the appropriate sections of this standard review plan. Aspects of the facility and its operations that have not changed since the last license renewal or amendment should not be reexamined.