

February 13, 2003

MEMORANDUM TO: Daniel Gillen, Chief  
Fuel Cycle Facilities Branch  
Division of Fuel Cycle Safety and Safeguards  
Office of Nuclear Material Safety and Safeguards

FROM: Larry W. Camper, Chief **/RA/**  
Decommissioning Branch  
Division of Waste Management  
Office of Nuclear Material Safety and Safeguards

SUBJECT: TECHNICAL ASSISTANCE REQUEST DATED DECEMBER 31, 2002,  
RELATED TO FRAMATOME RICHLAND LETTER DATED  
NOVEMBER 25, 2002, ON REMOVAL AND REMEDIATION OF  
SURFACE IMPOUNDMENT SYSTEM

The FCSS Fuel Cycle Licensing Branch requested the Decommissioning Branch to review the Framatome Richland letter dated November 25, 2002, and determine what the next step should be in the staff's review of this project. The letter described the licensee's intent to remove and remediate their surface impoundment system in accordance with a Consent Decree issued by the State of Washington.

Our review of the licensee's letter indicates that submission of a decommissioning plan is not required for their planned actions to remove and remediate their surface impoundment system. This is based on an assessment of the licensee's planned actions with respect to the criteria in 10 CFR 70.38 (g).

With regard to the need for a license amendment, again our review indicates that one is not required. Based on the descriptions provided, it appears that the activities to be undertaken to remove and remediate the surface impoundment system are similar to activities that have been conducted by the licensee in the past and are already authorized by the license. However, if the licensee determines that activities not previously authorized are necessary to complete the removal and remediation of the surface impoundment system, a license amendment would be required at that time.

You should also be aware that the activities as described by the licensee do not appear to pose environmental impacts that could exceed normal operations and therefore do not require an Environmental Assessment. However, as above, if the licensee revises their planned activities such that they could have an environmental impact that exceeds normal operations, then an Environmental Assessment would be required.

Additionally, the licensee should continue the radiation protection program described in Chapter 3 of the License Conditions during the conduct of the activities to remove and remediate the

surface impoundment system. Appropriate controls for personnel radiation protection should be established following the decommissioning of the lagoons commensurate with the level of decontamination of the lagoon areas and consistent with 10 CFR 20.1201(a).

Should you have any questions on this please contact John Hickman, of my staff, at 415-3017.

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