

May 18, 2000

Mr. Philip Mazor
Remedial Project Manager
Waste Management, Inc.
700 56th Ave.
Zeeland, MI 49464

SUBJECT: NRC INSPECTION REPORT 040-09022/2000001(DNMS) OF WASTE
MANAGEMENT, INC.

Dear Mr. Mazor:

This refers to the routine safety inspection conducted at 2370 Two-Mile Road, Bay County, Michigan, by Ed Kulzer and Peter Lee of this office on May 11, 2000. The inspectors were accompanied by Sherry Lewis, and Sam Nalluswami from the NRC Office of Nuclear Materials Safety and Safeguards.

The inspection was an examination of activities conducted under your license as they relate to radiation safety and to compliance with the Commission's rules and regulations and the conditions of your license. Within these areas, the inspection consisted of discussions with you and a tour of your facility.

No violations of NRC requirements were identified during the course of this inspection.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter will be placed in the NRC Public Electronic Reading Room (PERR) link at the NRC home page, namely ><http://www.nrc.gov/NRC/ADAMS/index.html>.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

/RA/

Bruce L. Jorgensen, Chief
Decommissioning Branch

Docket No. 040-09022
License No. SUC-01555

cc: D. Minnaar, Chief, Michigan Department
of Environmental Quality

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NAME	Kulzer:gm	<input checked="" type="checkbox"/>	Lee	<input checked="" type="checkbox"/>	Jorgensen	<input checked="" type="checkbox"/>	
DATE	05/19/00	<input checked="" type="checkbox"/>	05/19/00	<input checked="" type="checkbox"/>	05/19/00	<input checked="" type="checkbox"/>	

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ADAMS

P. Mazor

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APPENDIX A

**MATERIALS DECOMMISSIONING INSPECTION FIELD NOTES
FOR FACILITIES NEEDING SIGNIFICANT DECOMMISSIONING EFFORT**

Region III

Inspection Report No.2000001 License No._SUC-01555 Docket No._040-09022

Licensee (Name & Address)

Waste Management _ Licensee Contact P. Mazor

Telephone No._616-688-5777_ Last Amendment No._____

_____ Date of Amendment_____

Program Code_____

Date of Last Inspection_____

Date of This Inspection_5/11/00_

Date of Next Inspection_____

Type of Inspection: (x) Announced () Unannounced

(X) Routine () Special

Initial Decomm. Reinspection of Decomm.

Level of Inspection: Normal Reduced Extended

Brief Description of Inspection Activities:

Conducting characterization activities.

Brief Description of Findings and Action:

No findings.

Summary of Findings and Action:

No violations cited, clear NRC Form 591 or regional letter issued

Violation(s), clear NRC Form 591 issued

Violation(s), regional letter issued

Followup on previous violations

Inspector: E. L. Kulzer Date 5/15/00
(Signature)

Approved: [Signature] Date 5-17-00

[Field notes are to be used by the inspector to assist with the performance of the inspection. Note that all areas indicated in the field notes are not required to be addressed during each inspection. However, for those areas not covered during the inspection, a notation ("Not Reviewed") should be made in each section where applicable. Additionally, all areas covered during the inspection should be documented in sufficient detail to describe what activities and/or records the inspector observed. The fieldnotes to the "Decommissioning Inspection Procedure for Materials Licensees" should be supplemented with: (1) the applicable inspection procedures for operating facilities provided in the Inspection Procedure (IP) 87100 series; and (2) other written documentation of the inspection, as necessary.]

1. SUMMARY OF DECOMMISSIONING STATUS

The checklist below is intended to provide, in a written outline format, summary documentation of the status of the licensee's facility in the decommissioning process. This documentation will be filed as part of the inspection report. The inspector should use this information to develop each inspection plan(s) for the various stages of decommissioning, namely, before dismantlement, during dismantlement and site remediation, and after site remediation.

- A. Licensee ceased operational program. (x) Y () N
- B. Required decommissioning financial assurance

mechanisms in place. (x) Y () N

C. Decommissioning Plan (DP) required. (x) Y () N

D. Licensee final survey required. (x) Y () N

E. NRC confirmatory survey required. (X) Y () N

F. NRC closeout inspection required. (x) Y () N

G. Licensee doing decommissioning planning
and preparation before dismantlement. (x) Y () N

H. Licensee actively remediating site. () Y (x) N

I. Licensee completed site remediation. () Y (x) N

Description of Facility Status:

Licensee is planning to characterize the extent of contamination on site.

2. INSPECTION OF KEY DECOMMISSIONING ACTIVITIES

The following is a generic checklist of major licensee activities occurring at various stages of decommissioning. From this generic checklist and from facility-specific activities you identify, develop the set of licensee activities to be inspected - for each individual inspection throughout the decommissioning process. Plan to inspect licensee activities that present potential high-risk

conditions. Then apply the standard health and safety inspection areas in Section 3 of these fieldnotes (taken from the applicable 87100 series IP for the licensee's operational program) to the specific licensee decommissioning activities that are being inspected.

To complete the licensee activities checklist, the inspector will need to obtain information from the Licensing Project Manager, review the DP, make observations at the licensee's facility, review licensee records, take measurements and samples of contaminants, and undertake other investigative measures, to determine whether the licensee is meeting all regulatory and DP commitments for each decommissioning activity the licensee is performing.

A. LICENSEE ACTIVITIES INSPECTED BEFORE DISMANTLEMENT

1. Licensed material used during operations

has been removed from site. () Y (x) N

2. Facility license conditions are

in place and met by licensee. (X) Y () N

3. Site security and control of contaminated material

being maintained in compliance with

10 CFR 20.1801 and 20.1802. (x) Y () N 4. Support systems and services (e.g., lighting,

water supply) are in place. (x) Y () N

5. Decommissioning schedules are consistent with

timeliness requirements in 10 CFR 30.36, 40.42,

and 70.38. (x) Y () N

6. Licensee's recordkeeping is consistent with

10 CFR 30.35, 40.36, and 70.25. (x) Y () N

7. Financial assurance requirements are being

maintained in accordance with 10 CFR 30.35,
40.36, and 70.25. Y N

8. Licensee is conducting site characterization
in accordance with applicable radiation
protection procedures. Y N

9. Construction of new site features (e.g., roads,
rail spurs, staging areas, sediment control ponds)
conforms to DP and does not compromise health
and safety of workers and public. Y N

10. Licensee activities conform to specific
license conditions and licensee programs and
procedures. Y N

11. Other licensee activities: Y N

Basis for Findings:

Inspection of the site .

B. LICENSEE ACTIVITIES INSPECTED DURING DECONTAMINATION,
DISMANTLEMENT, AND SITE REMEDIATION

1. Site security and control of contaminated material
being maintained in compliance with

10 CFR Part 20. (X) Y () N

2. Decontamination and dismantlement of structures
are being performed consistent with DP and

sound industry practice (structures include
buildings, utilities, treatment lagoons, etc.). () Y (x) N

3. Decontamination and remediation of the following
are being performed consistent with DP and
sound industry practice:

a. Soil. () Y (x) N

b. Sediment. () Y () N

c. Surface waters. () Y () N

d. Groundwater. () Y () N

e. Other mediums:

_____ () Y () N

4. Licensee release and disposal of decommissioning
wastes are consistent with DP and approved
by NRC for:

a. Liquid wastes (e.g., groundwater,

surface water, liquid from treatment

ponds, process liquids). Y N

b. Solid wastes (e.g., building materials,

process and other facility equipment,

concrete rubble, soil). Y N

c. Other wastes: Y N

5. Temporary, on-site storage of low-level

radioactive wastes from decommissioning meets

license conditions and guidance in IP 84890. Y N

6. Packaging and shipment of radioactive waste

materials meet requirements in

40 CFR Parts 173-178 and 10 CFR Part 71. Y N

7. Restoration of site - Licensee has restored site

to meet license conditions and NRC-approved plans. Y N

8. Licensee survey of material and equipment for

free release sufficient to demonstrate compliance

with release criteria.

9. Other licensee activities: Y N

Basis for Findings:

Inspection of site.

C. LICENSEE ACTIVITIES INSPECTED AFTER
COMPLETION OF SITE REMEDIATION

1. Licensee has submitted NRC Form 314 for
disposition of licensed material in
accordance with 10 CFR 30.36, 40.42, and 70.38. Y N

2. Licensee's final survey program is acceptable
(see Appendix B for inspection items for final
surveys). Y N

3. NRC confirmatory survey performed. Y N

4. Site maintenance activities (if any, for restricted
use) conform to license conditions and
NRC-approved plans and are in place and functional. Y N

5. Other licensee activities: Y N

Basis for Findings:

3. INSPECTION OF STANDARD HEALTH AND SAFETY AREAS FROM THE OPERATIONAL INSPECTION PROGRAM

Identify the standard inspection areas (from the inspection program of the licensee's operational program) to be covered during each decommissioning inspection. [Inspection areas A through L below correspond to the typical inspection areas in the 87100 series IPs that are applicable to decommissioning.] Then identify the new activities within the standard inspection areas undertaken by the licensee during decommissioning. Some of the new activities given below, as well as any other activities the inspector identifies, should be considered inspection items under the general set of health and safety inspection areas used in the applicable 87100 series IP.

Minimum inspection areas for the initial decommissioning inspection: decommissioning organization (A.1); decommissioning activities in compliance with NRC-approved DP (A.2); licensee procedures for implementing the DP (A.3); Radiation Safety Committee (RSC) and Radiation Safety Officer (RSO) responsibilities (A.4); and the licensee's decommissioning training program (E.1).

A. GENERAL OVERVIEW

1. Describe the licensee's decommissioning
organizational structure:

P. Mazor- Project Manager

no decommissioning work has started.

2. Licensee is performing decommissioning activities in compliance with its approved DP. Y N

4. Licensee has implemented procedures for the decommissioning activities identified in the DP. Y N

5. The RSC and RSO fulfill license requirements to deal with all decommissioning activities. Y N

Basis for Findings:

site inspection.

B. FACILITIES

1. Describe, from field observation, the licensee-identified facilities and outdoor areas to be decommissioned:

Field where waste was deposited.

2. The licensee's remediation plan includes

all the contaminated facilities and areas

on-site and off-site. () Y () N

3. All essential systems and services (e.g.,

electrical power, water supply, communications

systems) are in place and functional for the planned decommissioning activities. (x) Y () N 4.
Licensee's emergency plan is in place and

operative for the duration of decommissioning. () Y () N

5. For complex sites needing site characterization,

describe the key site characterization activities

to be performed by the licensee to determine the

nature and extent of contamination:

6. Licensee's characterization activities

performed in conformance with good

industry practice. () Y (x) N

Basis for Findings:

not begun..

C. EQUIPMENT AND INSTRUMENTATION

1. Survey instruments are applicable to contaminants of interest. Y N
2. Use of survey instruments appropriate for site. Y N

Basis for Findings:

D. MATERIALS

1. Radioactive materials licensed during operations have been removed offsite; residual quantities conform to license conditions. Y N
2. Security and control of licensed materials, including contaminated areas, is being maintained. Y N

Basis for Findings:

Site inspection.

E. TRAINING

1. Licensee has developed training program for new decommissioning activities (e.g., demolition of structures, excavation of soil); program is adequate. Y N
2. Training program being effectively implemented. Y N

Basis for Findings:

No plan as yet.

F. AREA RADIATION SURVEYS AND CONTAMINATION CONTROL

1. Area surveys are being performed in areas being decommissioned. Y N
2. Where active remediation (e.g., demolition of structures, excavation of soil) is being performed, radiation levels in unrestricted areas do not exceed 2 mrem in any one hour. Y N

Basis for Findings:

site inspection.

G. RADIATION PROTECTION

1. The licensee's approved health physics program

is being implemented in the field for new

decommissioning activities. () Y (x) N

2. Site security and control of contaminated material

are in compliance with 10 CFR 20.1801 and 20.1802. (x) Y () N

Basis for Findings:

Site inspection.

H. RADIOACTIVE WASTE MANAGEMENT/EFFLUENTS/ENVIRONMENTAL MONITORING

1. Offsite disposal of decommissioning wastes

conforms to free release criteria and

disposal site requirements. () Y () N

2. All new effluent releases conform to DP

and applicable regulations. () Y () N

3. The licensee's environmental monitoring program

is being implemented in conformance with the DP

and all applicable limits are being met. () Y () N

4. Temporary storage/staging areas for radioactive wastes

from building demolition, equipment dismantlement,

soil excavation, etc., are adequately posted and

protected. () Y () N

Basis for Findings:

site inspection.

I. RECORDKEEPING FOR DECOMMISSIONING

1. Copies of the licensee's decommissioning

cost estimates and funding methods are on file. () Y () N 2. Licensee has adequate records for decommissioning

activities performed (e.g., for decontamination and

dismantlement of structures; decontamination

and remediation of soil, sediment, surface waters,

groundwater; surveys of remediated facilities). () Y () N

3. Licensee's financial assurance conforms

with the financial assurance requirements of

NRC-approved possession limits and NRC regulations. () Y () N

Basis for Findings:

site inspection.

J. TRANSPORTATION

1. Describe the licensee's program to package and ship decommissioning waste materials:

2. Licensee's program meets all applicable 10 CFR and 49 CFR requirements for marking labeling, placarding, and shipping paper requirements for radioactive waste shipments. () Y () N

Basis for Findings:

No waste shipments made.

K. POSTING AND LABELING

1. All contaminated areas, waste processing areas, and waste handling areas are posted in conformance with regulations. Y N
2. Packaged radioactive waste materials are labeled in accordance with regulations. Y N

Basis for Findings:

no waste shipments made.

L. OCCUPATIONAL HEALTH AND SAFETY

1. Describe the occupational health and safety observations made at the licensee's facilities:
no drilling was done while we were on site..

2. Licensee and Occupational Safety and Health

Administration were informed of

occupational health and safety issues

observed during the inspection. () Y (x) N

Basis for Findings:

site inspection.

4. VIOLATIONS, NON-CITED VIOLATIONS, FOLLOWUP ITEMS, AND OTHER ISSUES

Briefly state (1) the requirements and (2) how and when the licensee violated the requirement. For non-cited violations, indicate why the violation was not cited. Briefly describe followup items and other issues.

END

APPENDIX B

FINAL SURVEY PROGRAM INSPECTION FIELD NOTES

1. STATUS OF LICENSEE FINAL SURVEY

A. Final survey report submitted to the NRC. () Y (x) N

B. Previous inspection(s) of licensee final
survey program conducted. () Y (x) N

C. Final survey report not submitted, licensee
final survey in progress. () Y (x) N

D. Final survey plan submitted and approved by
NRC license reviewer. () Y (x) N

Basis for Findings:

site inspection.

2. INSPECTION AREAS FOR LICENSEE FINAL SURVEYS

Notes:

(1) For facilities where an approved decommissioning plan (DP) is required, inspections should be made against commitments in the DP and the licensee's final survey plan (which would have been approved by the NRC license reviewer during license review). For facilities where a DP is not required, inspections should be made against NRC regulations, license conditions, and applicable guidance in NUREG/CR-5849.

(2) For facilities that require a significant decommissioning effort, all the inspection areas listed below should be inspected while the licensee's final survey program is in progress. For small, licensed facilities that do not require a significant decommissioning effort, only some of the inspection areas below may apply, and it may not be practicable to inspect these areas until after the licensee's final survey is completed and the licensee's final survey report has been submitted to NRC.

(3) Inspection of a licensee's final survey may include independent confirmatory measurements by the inspector or NRC contractor. The extent of the confirmatory measurements, and whether the use of an NRC contractor is warranted, depends on a number of factors that are discussed in Section 2.C. In most cases, minimal confirmatory surveys should be sufficient.

(4) The inspector should identify which inspection areas listed below are performed during each

inspection.

A. SITE CONDITIONS AT TIME OF LICENSEE FINAL SURVEY

1. Site has been decontaminated/remediated

in accordance with DP or site procedures. Y N

Basis for Findings:

site inspection.

B. LICENSEE FINAL SURVEY PLANS AND PROCEDURES

1. Contaminants:

a. Licensee has identified all potential

contaminants. Y N

b. Licensee has specified acceptable

release criteria. Y N

c. Licensee has clearly documented the basis

for any alternate criteria, if applicable. Y N