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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

FEB 17 1992

MEMORANDUM FOR: Richard L. Bangart, Director  
Division of Low-Level Waste Management  
and Decommissioning, NMSS

FROM: Paul H. Lohaus, Chief  
Low-Level Waste Management Branch  
Division of Low-Level Waste Management  
and Decommissioning, NMSS

SUBJECT: COMMISSION PAPER ON LOW-LEVEL WASTE AGREEMENT STATE REVIEW  
GUIDELINES

While reviewing the recent Commission Paper on the Agreement State program review guidelines for Low-Level Waste (LLW), I again reviewed the April 1991 assessment of our Low-Level Waste Management (LLWM) program against the guidelines. This assessment is included as Enclosure 4 to the Commission paper. The status of actions we have taken in response to the report's recommendations follows. A copy of the report is enclosed for your reference.

Status of Recommendation 1

Although a formal QA program has not been implemented, the LLW program has taken the following actions to help ensure systematic training of staff: (1) development of IDP's for individual staff; (2) staff attendance at short courses both within and outside NRC; (3) the development of an orientation program for new staff which outlines a reading and familiarization program for key LLW management documents; and (4) identification of selected courses and time frames for attendance at such courses.

Status of Recommendation 2

LLWM staff does not believe a separate amendment is warranted for this recommendation. Staff plans to address this recommendation as a part of a future amendment, to the license, that may be initiated.

Status of Recommendation 3

Staff has developed initial guidance on the handling of SNM license renewals and amendments for SNM licenses at Barnwell and Hanford. The approach to be followed for processing and issuance of such amendments by staff, including issuance of SER's and EA's, was further refined during renewal of the Barnwell SNM license. Staff planned, following the renewal, to incorporate that experience into more detailed procedures and guidance. Due to other higher priority work, written procedures have not been finalized. Staff believes, however, that the license, SER, EA and notices prepared by staff for the Barnwell renewal provide an adequate model and framework for staff to follow in processing future amendment and renewal requests. In addition, staff

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developed a draft inspection procedure for NRC's SNM licenses, scheduled to be completed in April of this year. Finally, LLWM staff has and will continue to coordinate closely with State licensing staff in any licensing activities affecting sites licensed by Agreement States.

Status of Recommendation 4

Due to higher priority work, staff has not developed specific written plans or procedures for NRC independent non-radiological testing to verify a licensee's test results. Staff has, and plans to continue to maintain, capability through technical assistance contractors, such as BNL, to perform such testing when determined to be necessary by Staff.

Status of an Additional Recommendation in the Text

Although not an itemized recommendation, the review team indicated NRC staff should continue efforts to develop additional LLWM inspection procedures. Staff has and is continuing efforts to develop further inspection guidance. This has included development and issuance of a new inspection program for LLW disposal facilities, incorporating additional information in existing materials inspection procedures on waste form and classification and development and issuance of a draft inspection procedure specific to NRC's SNM licenses.

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Enclosure: As stated

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ACNW YES <u>    </u>	NO <u>X</u>			

SUBJECT ABSTRACT: REVIEW OF NRC LOW-LEVEL WASTE REGULATORY PROGRAM AGAINST PROPOSED AGREEMENT STATE GUIDELINES  
\* SEE PREVIOUS CONCURRENCE

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