

APPENDIX A

POTENTIAL TOPICS FOR TREND ANALYSIS

1. Personnel exposures.
2. Concentrations of airborne radioactive and hazardous chemical contamination in plant areas and effluents.
3. Radioactive contamination in areas and on equipment not normally contaminated.
4. Failure of required radiation measurement instrumentation to operate properly.
5. Failure of respiratory protective equipment to work properly.
6. Failure of effluent filters to meet specifications.
7. Calculated or measured offsite exposure to any member of the public.

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VALUE/IMPACT STATEMENT

1. PROPOSED ACTION

1.1 Description

The Commission's regulations in 10 CFR Part 40, "Domestic Licensing of Source Material," identify the general information to be supplied in applications for licenses to possess and use source material in uranium hexafluoride production plants. However, Part 40 does not specify the detail of the information needed by the staff in its review of an application for license renewal or a format for its presentation. The proposed action is to provide guidance on format and content for the preparation of applications for the renewal of licenses for uranium hexafluoride production.

1.2 Need for Action

The NRC Office of Inspector and Auditor reviewed the license renewal process in a January 1978 report to the Commissioners. It concluded that the staff should pursue the development of applicable guides, one of which is this standard format and content guide. The proposed action is issuance of effective guidance for preparing an application for the renewal of a license for uranium hexafluoride production.

1.3 Value/Impact of Proposed Action

1.3.1 NRC Operation

The proposed action identifies the type of information needed and the desired format for its presentation to facilitate orderly NRC staff review of license renewal applications for uranium hexafluoride production. The staff review effort should be reduced because license renewal applications will be complete at the time of submittal. Considerable time on the part of the Office of Inspection and Enforcement would be saved because license conditions should be more complete and inspectable and would provide a firm basis for the resolution of findings.

1.3.2 Other Government Agencies

Other Government agencies are not involved in this proposed action; therefore there is no impact on other Government agencies.

1.3.3 Industry

The proposed action should expedite the licensing process and thus reduce licensing delays and costs. Use of the standard format would result in less time and effort in preparing and submitting applications.

1.3.4 Public

There could be a cost reduction to the public as taxpayers and consumers because of the improved efficiency of the licensing process and the subsequent inspection process that NRC must perform at licensed uranium hexafluoride production plants.

1.4 Decision on Proposed Action

Format and content guidance should be furnished for preparing applications for the renewal of licenses for uranium hexafluoride production.

2. TECHNICAL APPROACH

The proposed action is nontechnical in its content; therefore this section is not applicable.

3. PROCEDURAL APPROACH

Several methods of making public the proposed guidance were considered and evaluated. A regulatory guide was selected as the best alternative for the proposed action because it was considered the most effective and efficient.

4. STATUTORY CONSIDERATIONS

4.1 NRC Authority

Authority for the proposed action is derived from the Atomic Energy Act of 1954, as amended, and the Energy Reorganization Act of 1974, as amended, and implemented through the Commission's regulations in Title 10 of the Code of Federal Regulations.

4.2 Need for NEPA Assessment

Issuance or amendment of guides for the implementation of regulations in Title 10, Chapter 1, of the Code of Federal Regulations is a categorical exclusion under paragraph 51.22(c)(16) of 10 CFR Part 51. Thus, an environmental impact statement or assessment is not required for this action.

5. RELATIONSHIP TO OTHER EXISTING OR PROPOSED REGULATIONS OR POLICIES

This regulatory guide should be consistent with future standard formats for new license applications for uranium hexafluoride production plants (in contrast to renewals). It would serve as a basis for developing standard review plans for license renewal applications.

6. SUMMARY AND CONCLUSIONS

A regulatory guide should be prepared for the standard format and content of the health and safety section of applications for renewal of licenses for uranium hexafluoride production.

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NUCLEAR REGULATORY COMMISSION
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