DECOMMISSIONING PLAN
TOBICO MARCH SGA
KAWKAWLIN, MICHIGAN

APPENDIX L

Crosswalk Relating Location of Information Found in the DP with the Checklist from NUREG 1727, App. A

JANUARY 2004

MACTEC

Information to be Submitted in the Decommissioning Plan *(As described in the NRC's Annotated Checklist from NUREG-1727)* *Note: Text in italics added by NRC, strikeouts deleted by NRC*	Applicability		DP Section, Table, or Figure where the required information is presented *(or MDNR Comment as to why it is not applicable)*
	NRC	MDNR	
1.0 EXECUTIVE SUMMARY			
▪ the name and address of the licensee or owner of the site;			Section(s): 1.1
▪ the location and address of the site;			Section(s): 1.1
▪ a brief description of the site and immediate environs;			Section(s): 1.2 Figure(s): 1-1 & 1-2
▪ a summary of the licensed activities that occurred at the site;	**NA**		
▪ the nature and extent of contamination at the site;			Section(s): 1.2 & 1.4 Figure(s): 1-3
▪ the decommissioning objective proposed by the licensee (i.e., restricted or unrestricted use);			Section(s): 1.3
▪ the DCGLs for the site, the corresponding doses from these DCGLs and the method that was use to determine the DCGLs;			Section(s): 1.5
▪ a summary of the ALARA evaluations performed to support the decommissioning;			Section(s): 1.6
If the licensee or responsible party requests license termination under restricted conditions, the restrictions the licensee intends to use to limit doses as required in 10 CFR Part 20.1403 or 20.1404 and a summary of institutional controls, financial assurance.		**NA**	License termination is not being requested under restricted conditions as described in CFR Part 20.1403 or 20.1404.
If the licensee requests license termination under restricted conditions or using alternate criteria, a summary of the public participation activities undertaken by the licensee to comply with 10 CFR Part 20.1403(d) or 20.1404(a)(4).		**NA**	License termination is not being requested under restricted conditions as described in CFR Part 20.1403 or 20.1404.
▪ the proposed initiation and completion dates of decommissioning;			Section(s): 1.7 & 8.5 Figure(s): 8-2
▪ any post-remediation activities (such as groundwater monitoring) that the licensee proposes to undertake prior to requesting license termination; and			Section(s): 1.8
▪ a statement that the licensee is requesting that its license be amended to incorporate the decommissioning plan			Section(s): 1.9

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	NRC	MDNR	
2.0 FACILITY OPERATING HISTORY			
2.1 LICENSE NUMBER/STATUS/ AUTHORIZED ACTIVITIES			
▪ the radionuclides and maximum activities of radionuclides authorized ~~and used~~ under the current *possession only* license;			Section(s): 2.1 Table(s): 2-1
▪ the chemical forms of the radionuclides authorized ~~and used~~ under the current *possession only* license;			Section(s): 2.1 Table(s): 2-1
▪ a detailed description of how the radionuclides are currently being *monitored* ~~used~~ at the site;			Section(s): 2.3, 4.6.1 Radionuclides have been shown to be confined within the disposal cell. Two rounds of leachate sampling have been performed. These confirm that the radionuclides are not leaching. Periodic gamma radiation surveys are performed in accordance with the Site's radioactive materials license conditions.
▪ the location(s) of *disposal* ~~use and storage~~ of the various radionuclides authorized under current licenses; and			Section(s): 2.4 & 2.5
▪ a scale drawing or map of the building or site and environs showing the current locations of radionuclide *disposal* ~~use~~ at the site;			Figure(s): 2-1, 4-2, 4-3, 4-4, and 4-7 Each of these figures contains a scale drawing of the site showing the locations of radionuclide disposal on the MDNR Site from several different perspectives. An additional large format topographic drawing of the site is provided in Appendix M.
▪ a list of amendments to the license since the last license renewal.	**NA**		Section(s): 2.2 Even though this has been marked NA by the NRC, a brief summary is provided.
2.2 LICENSE HISTORY			
▪ the radionuclides and maximum activities of radionuclides authorized and used under all previous licenses;	**NA**		

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	NRC	MDNR	
▪ the chemical forms of the radionuclides authorized and used under all previous licenses;	**NA**		
▪ a detailed description of how the radionuclides were used at the site;	**NA**		
▪ the location(s) of use and storage of the various radionuclides authorized under all previous licenses	**NA**		
▪ a scale drawing or map of the site, facilities and environs showing previous locations of radionuclide use at the site	**NA**		
2.3 PREVIOUS DECOMMISSIONING ACTIVITIES			
▪ a list or summary of areas at the site that were remediated in the past,	**NA**		
▪ a summary of the types, forms, activities and concentrations of radionuclides that were present in previously remediated areas;	**NA**		
▪ the activities that caused the areas to become contaminated;	**NA**		Sections 1.2, 2.5, & 4.0 In spite of the fact that the NRC has indicated that this information is not applicable to MDNR's DP, it is included in varying degrees of detail.
▪ the procedures used to remediate the areas and the disposition of radioactive material generated during the remediation;	**NA**		
▪ a summary of the results of the final radiological evaluation of the previously remediated area	**NA**		
▪ a scale drawing or map of the site, facilities and environs showing the locations of previous remedial activity	**NA**		
2.4 SPILLS			
▪ a summary of areas at the site where spills (or uncontrolled releases) of radioactive material occurred in the past;	**NA**		
▪ the types, forms, activities and concentrations of radionuclides involved in the spill or uncontrolled release, and;	**NA**		
▪ a scale drawing or map of the site, facilities and environs showing the locations of spills	**NA**		

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	NRC	MDNR	
2.5 PRIOR ON-SITE BURIALS			
▪ a summary of areas at the site where radioactive material has been buried in the past;			Section(s): 2.5, 4.4
▪ the types, forms, activities and concentrations of waste and radionuclides in the former burial, and;			Section(s): 2.5, 4.4
▪ a scale drawing or map of the site, facilities and environs showing the locations of former burials.			Figure(s): 2-1, 4-2, 4-3, 4-4, and 4-7 Each figure contains a scale drawing of the site showing the locations of radionuclide disposal on the MDNR Site from several different perspectives.
3.0 FACILITY DESCRIPTION			
3.1 SITE LOCATION AND DESCRIPTION			
▪ the size of the site in acres or square meters;			Section(s): 3.1
▪ the State and county in which the site is located;			Section(s): 3.1
▪ the names and distances to nearby communities, towns and cities;			Section(s): 3.1
▪ a description of the contours and features of the site;			Section(s): 3.1
▪ the elevation of the site;			Section(s): 3.1
▪ a description of property surrounding the site; including the location of all off-site wells used by nearby communities or individuals;			Section(s): 3.1 There are no groundwater impacts resulting from radioactivity at the site
▪ the location of the site relative to prominent features such as rivers and lakes.			Section(s): 3.1

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	NRC	MDNR	
▪ a map that shows the detailed topography of the site using a contour interval the location of the nearest residences and all significant facilities or activities near the site;			Section(s): 3.1 Figure(s): 3-1
▪ a description of the facilities (buildings, parking lots, fixed equipment, etc.) at the site.			Section(s): 3.1
3.2 POPULATION DISTRIBUTION			
▪ a summary of the current population in and around the site, by compass vectors			Section(s): 3.2
▪ a summary of the projected population in and around the site by compass vectors			Section(s): 3.2
▪ a list of minority populations by compass vectors			Section(s): 3.2.1 Note: based on census data there are no statistically significant minority populations near the site.
▪ demographic data by census block group to identify minority or low-income populations			Section(s): 3.2.2 Figure(s): 3-4 & 3-5 Table(s): 3-4 & 3-5
3.3 CURRENT/FUTURE LAND USE			
▪ a description of the current land uses in and around the site;			Section(s): 3.3
▪ a summary of anticipated land uses.			Section(s): 3.3 & 5.3
3.4 METROLOGY AND CLIMATOLOGY			
▪ a description of the general climate of the region			Section(s): 3.4, 3.4.1
▪ seasonal and annual frequencies of severe weather phenomena			Section(s): 3.4.2
▪ weather-related radionuclide transmission parameters			Figure(s): 3-7 & 3-8

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	NRC	MDNR	
▪ routine weather-related site deterioration parameters			Section(s): 3.4.1 Figure(s): 3-7, 3-8, & 3-9 Table(s): 3-6
▪ extreme weather-related site deterioration parameters			Section(s): 3.4.2 Figure(s): 3-10 & 3-11 Table(s): 3-7 & 3-8
▪ a description of the local (site) meteorology			Section(s): 3.4
▪ the National Ambient Air Quality Standards Category of the area in which the facility is located and, if the facility is not in a Category 1 zone, the closest and first downwind Category 1 Zone.			Section(s): 3.4.3 Figure(s): 3-12 & 3-13
3.5 GEOLOGY AND SEISMOLOGY			
▪ a detailed description of the geologic characteristics of the site and the region around the site			Section(s): 3.5
▪ a discussion of the tectonic history of the region, regional geomorphology, physiography, stratigraphy, and geochronology			Section(s): 3.5.2
▪ a regional tectonic map showing the site location and its proximity to tectonic structures			Figure(s): 3-15
▪ a description of the structural geology of the region and its relationship to the site geologic structure			Section(s): 3.5
▪ a description of any crustal tilting, subsidence, karst terrain, landsliding, and erosion.			Section(s): 3.5.2
▪ a description of the surface and subsurface geologic characteristics of the site and its vicinity			Section(s): 3.5
▪ a description of the geomorphology of the site			Section(s): 3.5, 3.5.2
▪ a description of the location, attitude, and geometry of all known or inferred faults in the site and vicinity			Section(s): 3.5.2
▪ a discussion of the nature and rates of deformation			Section(s): 3.5.2
▪ a description of any man-made geologic features such as mines or quarries.			Section(s): 3.5.2
▪ a description of the seismicity of the site and region			Section(s): 3.5.2

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	NRC	MDNR	
▪ a complete list of all historical earthquakes that have a magnitude of 3 or more or a modified Mercalli intensity of IV or more within 200 miles of the site.			Section(s): 3.5.2
3.6 SURFACE WATER HYDROLOGY			
▪ a description of site drainage and surrounding watershed fluvial features			Section(s): 3.6, 3.6.4
▪ water resource data including maps, hydrographs, and stream records from other agencies (e.g., U.S. Geological Survey and U.S. Army Corps of Engineers).			Section(s): 3.6.1, 3.6.3
▪ topographic maps of the site that show natural drainages and man-made features			Section(s): 3.6.1 Figure(s): 3-17, 3-20
▪ a description of the surface water bodies at the site and surrounding areas			Section(s): 3.6
▪ a description of existing and proposed water control structures and diversions (both upstream and downstream that may influence the site).			Section(s): 3.6.2
▪ flow-duration data that indicate minimum, maximum, and average historical observations for surface water bodies in the site areas			Section(s): 3.6.1, 3.6.3
▪ aerial photography and maps of the site and adjacent drainage areas identifying features such as drainage areas, surface gradients, and areas of flooding.			Section(s): 3.6 Figure(s): 3-18 & 3-19
▪ an inventory of all existing and planned surface water users, whose intakes could be adversely affected by migration of radionuclides from the site			Section(s): 5.3
▪ topographic and/or aerial photographs that delineate the 100-year floodplain at the site			Section(s): 3.6.4 Figure(s): 3-21
▪ a description of any man-made changes to the surface water hydrologic system that may influence the potential for flooding at the site			Section(s): 3.6.2

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	NRC	MDNR	
3.7 GROUNDWATER HYDROLOGY			
▪ a description of the saturated zone			Section(s): 3.7.1
▪ descriptions of monitoring wells			Section(s): 3.7.1
▪ physical parameters			Section(s): 3.7
▪ a description of groundwater flow directions and velocities			Section(s): 3.7.2
▪ a description of the unsaturated zone			Section(s): 3.7.2
▪ information on all monitor stations including location and depth			Section(s): 3.7.2 Table(s) 3-12
▪ a description of physical parameters			Section(s): 3.7
▪ a description of the numerical analyses techniques used to characterize the unsaturated and saturated zones			Section(s): 3.7.1, 3.7.2
▪ the distribution coefficients of the radionuclides of interest at the site.			Section(s): 3.7.3
▪ *Typical geologic cross-sections showing groundwater elevations and flow direction(s)*			Section(s): 3.7.4 Figure(s): 3-23
3.8 NATURAL RESOURCES			
▪ a description of the natural resources occurring at or near the site			Section(s): 3.8
▪ a description of potable, agricultural, or industrial ground or surface waters			Section(s): 3.8
▪ a description of economic, marginally economic, or sub-economic known or identified natural resources as defined in U.S. Geological Survey Circular 831;			Section(s): 3.8
▪ mineral, fuel, and hydrocarbon resources near and surrounding the site which, if exploited, would effect the licensee' or responsible party's dose estimates			Section(s): 3.8

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	NRC	MDNR	
3.9 ECOLOGY/ENDANGERED SPECIES			
▪ a list of commercially or recreationally important invertebrate species known to occur within 5 km of the site;			There are no known commercially or recreationally important invertebrate species known to occur within 5 km of the site.
▪ a list of all commercially important floral species known to occur within 5 km of the site;			Section(s): 3.9.2
▪ a list of commercially or recreationally important vertebrate animals known to occur within 5 km of the site;			Section(s): 3.9.1
▪ estimates of the relative abundance of both commercially and recreationally important game and non-game vertebrates;			Section(s): 3.9.1
▪ a list of all endangered species at or within 5 km of the site.			Section(s): 3.9.3
4.0 RADIOLOGICAL STATUS OF FACILITY			
4.1 CONTAMINATED STRUCTURES			
▪ a list or description of all structures at the facility where licensed activities occurred that contain residual radioactive material in excess of site background levels;	**NA**		
▪ a summary of the structures and locations at the facility that the licensee or responsible party has concluded have not been *radiologically* impacted ~~by licensed operations~~ and the rationale for the conclusion;			Section(s): 4.0, 4.1
▪ a list or description of each room or work area within each of these structures;	**NA**		
▪ a summary of the background levels used during scoping or characterization surveys;	**NA**		
▪ a summary of the locations of contamination in each room or work area	**NA**		

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	NRC	MDNR	
▪ a summary of the radionuclides present at each location, the maximum and average radionuclide activities in dpm/100cm^2, and, if multiple radionuclides are present, the radionuclide ratios;	**NA**		
▪ the mode of contamination for each surface (i.e., whether the radioactive material is present only on the surface of the material or if it has penetrated the material);	**NA**		
▪ the maximum and average radiation levels in mrem/hr in each room or work area; and a scale drawing or map of the rooms or work areas showing the locations of radionuclide material contamination.	**NA**		
4.2 CONTAMINATED SYSTEMS AND EQUIPMENT			
▪ a list or description and the location of all systems or equipment at the facility that *the licensee or responsible party has concluded have not been radiologically impacted and the rationale for this conclusion* ~~contain residual radioactive material in excess of site background levels~~;			Section(s): 4.0, 4.2
▪ a summary of the radionuclides present in each systems or on the equipment at each location, the maximum and average radionuclide activities in dpm/100cm^2, and, if multiple radionuclides are present, the radionuclide ratios;	**NA**		
▪ the maximum and average radiation levels in mrem/hr at the surface of each piece of equipment;	**NA**		
▪ a summary of the background levels used during scoping or characterization surveys; and,	**NA**		
▪ a scale drawing or map of the rooms or work areas showing the locations of the contaminated systems or equipment;	**NA**		

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	NRC	MDNR	
4.3 SURFACE SOIL CONTAMINATION			
~~▪ a list or description of all locations at the facility where surface soil contains residual radioactive material in excess of site background levels;~~ *provide a valid explanation (including radiological analysis of soil as needed) for concluding that there is no radionuclide contamination present in surface soil from facility operations supporting site characterization work. If contamination is present, the last three items in this section would also be applicable.*			Section(s): 4.3 It is not expected that residual radioactivity in excess of background concentrations is present in surface soil on the site. Subsurface soil characterization was carried out using approved plans and procedures. Among those procedures were ones specifically designed to prevent the spread of radioactivity associated with the subsurface soil characterization work. To date, no post-characterization radiological survey or surface soil sampling has been undertaken to specifically address and preclude this supposition. While it is MDNR's belief that surface soils have not been impacted by the subsurface soil characterization program, a surface soil survey/sampling program has been designed to be implemented as part of the final status survey for the site.
▪ a summary of the background levels used during scoping or characterization surveys	**NA**		
▪ a summary of the radionuclides present at each location, the maximum and average radionuclide activities in pCi/gm, and, if multiple radionuclides are present, the radionuclide ratios;			Section(s): 4.3 –– See comment above
▪ the maximum and average radiation levels in mrem/hr at each location; and			Section(s): 4.3 –– See comment above
▪ a scale drawing or map of the site showing the locations of radionuclide material contamination in surface soil;			Section(s): 4.3 –– See comment above
4.4 SUBSURFACE SOIL CONTAMINATION			
▪ a list or description of all locations at the facility where subsurface soil contains residual			Section(s): 4.4
▪ radioactive material in excess of site background levels;			Section(s): 4.4

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	NRC	MDNR	
▪ a summary of the background levels used during scoping or characterization surveys			Section(s): 4.4.2
▪ a summary of the radionuclides present at each location, the maximum and average radionuclide activities in pCi/gm, and, if multiple radionuclides are present, the radionuclide ratios;			Section(s): 4.4.3 Figure(s): 4-4, 4-7
▪ the depth of the subsurface soil contamination at each location; *and in a cross-section*; and			Section(s): 4.4.4 Figure(s): 4-9, 4-10, 4-11, 4-12
▪ a scale drawing or map of the site showing the locations of subsurface soil contamination.			Figure(s): 4-2, 4-3, 4-4, and 4-7
4.5 SURFACE WATER			
▪ a list or description of all surface water bodies at the facility that contain residual radioactive material in excess of site background levels;			Section(s): 4.5
▪ a summary of the background levels used during scoping or characterization surveys			Section(s): 4.4.2
▪ a summary of the radionuclides present in each surface water body and the maximum and average radionuclide activities in pCi/l.			Section(s): 4.5
4.6 GROUNDWATER			
▪ a summary of the aquifer(s) at the facility that contain residual radioactive material in excess of site background levels;			Section(s): 4.6
▪ a summary of the background levels used during scoping or characterization surveys			Section(s): 4.4.2
▪ a summary of the radionuclides present in each aquifer and the maximum and average radionuclide activities in pCi/l			Section(s): 4.6

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	NRC	MDNR	
5.0 DOSE MODELING			
5.1 UNRESTRICTED RELEASE USING SCREENING CRITERIA			
5.1.1 Unrestricted release using screening criteria for building surface residual radioactivity			
▪ the general conceptual model (for both the source term and the building environment) of the site; and,		**NA**	Technically, the LCTS building is not subject to the decommissioning radiological release criteria because MDNR plans to remove the building prior to achieving the final site condition. Therefore, dose modeling designed to establish release criteria was not used. In lieu of such, the MDNR plans to implement the already approved decontamination limits from the NRC's PGD 83-23 (as specified in the MDNR's radioactive materials license) as the release criteria. See sections 8.0 & 14.0
▪ a summary of the screening method (i.e., running DandD or using the look-up tables) used in the decommissioning plan.		**NA**	See sections 8.0 & 14.0
5.1.2 Unrestricted release using screening criteria for surface soil residual radioactivity			
▪ justification on the appropriateness of using the screening approach (for both the source term and the environment) at the site; and,		**NA**	MDNR has not elected to use the screening approach at the site.
▪ a summary of the screening method (i.e., running DandD or using the look-up tables) used in the decommissioning plan.		**NA**	MDNR has not elected to use the screening approach at the site.
5.2 UNRESTRICTED RELEASE USING SITE-SPECIFIC INFORMATION			
▪ source term information including nuclides of interest, configuration of the source, areal variability of the source, etc.			Section(s): 5.2.1
▪ description of the exposure scenario including a description of the critical group.			Section(s): 5.3.7, 5.4, 5.5, 5.6, 5.7
▪ description of the conceptual model of the site including the source term, physical features important to modeling the transport pathways, and the critical group.			Section(s): 5.2.1
▪ identification/description of the mathematical model used (e.g., hand calculations, DandD Screen v1.0, RESRAD v ~~5.81~~ *6.0*, etc.).			Section(s): 5.1 *(RESRAD, Version 6.2.1, was used)*

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	NRC	MDNR	
▪ description of the parameters used in the analysis.			Section(s): 5.2, 5.4.3, 5.5.3, 5.6.3, 5.7.3 Appendices: A thru H
▪ discussion about the effect of uncertainty on the results.			Section(s): 5.8, 5.9
▪ input and output files or printouts, if a computer program was used.			RESRAD Input files are supplied on CD-ROM Appendix(s): A thru H
5.3 RESTRICTED RELEASE USING SITE-SPECIFIC INFORMATION			
▪ source term information including nuclides of interest, configuration of the source, areal variability of the source, and chemical forms;	**NA**		
▪ a description of the exposure scenarios including a description of the critical group for each scenario;	**NA**		
▪ a description of the conceptual model(s) of the site that includes the source term, physical features important to modeling the transport pathways, and the critical group for each scenario;	**NA**		
▪ identification/description of the mathematical model(s) used (e.g., hand calculations, RESRAD v5.81, etc.);	**NA**		
▪ a summary of parameters used in the analysis;	**NA**		
▪ a discussion about the effect of uncertainty on the results; and	**NA**		
▪ input and output files or printouts, if a computer program was used.	**NA**		
5.4 RELEASE INVOLVING ALTERNATE CRITERIA			
▪ source term information including nuclides of interest, configuration of the source, areal variability of the source, and chemical forms;	**NA**		
▪ a description of the exposure scenarios including a description of the critical group for each scenario;	**NA**		
▪ a description of the conceptual model(s) of the site that includes the source term, physical features important to modeling the transport pathways, and the critical group for each scenario;	**NA**		
▪ identification/description of the mathematical model(s) used (e.g., hand calculations, RESRAD v5.81, etc.);	**NA**		

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	NRC	MDNR	
▪ a summary of parameters used in the analysis;	**NA**		
▪ a discussion about the effect of uncertainty on the results; and	**NA**		
▪ input and output files or printouts, if a computer program was used.	**NA**		
6.0 ALTERNATIVES CONSIDERED AND RATIONALE FOR CHOSEN ALTERNATIVE			
6.1 ALTERNATIVES CONSIDERED			
The licensee must address the no action alternative and related doses due to this alternative.			Section(s): 6.0
▪ a description of the facility if the alternative is employed;			Section(s): 6.1
▪ a summary of the health effects to adjacent communities if the alternative is employed;			Section(s): 6.1
▪ a summary of the impacts on community resources such as land use and property values;			Section(s): 6.1
▪ a summary of the impacts on the geology, hydrology, air quality and ecology in and around the site;			Section(s): 6.1
▪ a description of impacts to minority or low-income populations within a 0.6 mile radius of the center of the facility (urban location) or within a 4 mile radius of the center of the facility (rural location);			Section(s): 6.1 There are no statistically significant minority or low-income populations in the vicinity of the MDNR site (See Sections 3.2.1 and 3.2.2)
▪ if appropriate, an assessment of the potential for criticality;	**NA**		
▪ a summary of the irreversible and irretrievable commitment of resources.			Section(s): 6.1
▪ an analysis of the proposed alternative and other alternatives as required by 10 CFR 51.45(c);			Section(s): 6.1
▪ a list of the permits, licenses, approvals, and other entitlements and the discussion of the status of compliance with these requirements required in 10 CFR 51.45(d)			Section(s): 6.1

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	NRC	MDNR	
6.2 RATIONALE FOR CHOSEN ALTERNATIVE			
▪ a description of why the licensee selected the preferred alternative described in the decommissioning plan.			Section(s): 6.2
▪ if the licensee has not selected the environmentally preferable alternative, an explanation of why this alternative was not selected.		**NA**	MDNR selected the environmentally preferable alternative.
7.0 ALARA ANALYSIS			
▪ a description of how the licensee or responsible party will achieve a decommissioning goal below the dose limit;			Section(s): 7.0
▪ a quantitative cost benefit analysis;		**NA**	Based upon generic analysis, it is known that the cost to reduce concentrations of radioactivity in soil to values below the decommissioning dose limit and associated accidents far outweigh the potential benefit (NUREG-1727)
▪ a description of how costs were estimated; and,		**NA**	See above comment
▪ a demonstration that the doses to the average member of the critical group are ALARA		**NA**	See above comment
8.0 PLANNED DECOMMISSIONING ACTIVITIES			
8.1 CONTAMINATED STRUCTURES			
▪ a summary of the remediation tasks planned for the contaminated structure in the order in which they will occur;			Section(s): 8.1 A single, non-contaminated out building is the only building-type structure on site. A release survey will be performed on the building to verify it is free of contamination prior to removal from the site.
▪ a description of the remediation techniques that will be employed in each room or area of the contaminated structure;			See above comment
▪ a summary of the radiation protection methods and control procedures that will be employed in each room or area;			See above comment

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	NRC	MDNR	
▪ a summary of the procedures already authorized under the existing license and those for which approval is being requested in the decommissioning plan;			See above comment
▪ a commitment to conduct decommissioning activities in accordance with written, approved procedures;			See above comment
▪ a summary of any unique safety or remediation issues associated with remediating the room or area; and,			See above comment
▪ for Part 70 licensees, a summary of how the licensee will ensure that the risks addressed in the facility's Integrated Safety Analysis will be addressed during decommissioning.		**NA**	MDNR does not possess a Part 70 License
8.2 CONTAMINATED SYSTEMS AND EQUIPMENT			
▪ a summary of the remediation tasks planned for each system in the order in which they will occur including which activities will be conducted by licensee staff and which will be performed by a contractor;			Section(s): 8.2 A single, non-contaminated system (the LCTS) is the only engineered system on site. A release survey will be performed to verify that the components are free of contamination prior to their removal from the site.
▪ a description of the techniques that will be employed to remediate each system in the facility or site;			See above comment
▪ a description of the radiation protection methods and control procedures that will be employed while remediating each system;			See above comment
▪ a summary of the equipment will be removed or decontaminated and how the decontamination will be accomplished;			See above comment
▪ a summary of the procedures already authorized under the existing license and those for which approval is being requested in the decommissioning plan;			See above comment
▪ a commitment to conduct decommissioning activities in accordance with written, approved procedures;			See above comment
▪ a summary of any unique safety or remediation issues associated with remediating any system or piece of equipment; and,			See above comment
▪ for Part 70 licensees, a summary of how the licensee will ensure that the risks addressed in the facility's Integrated Safety Analysis will be addressed during decommissioning.	**NA**		

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	NRC	MDNR	
8.3 SOIL			
▪ a summary of the removal/remediation tasks planned for surface and subsurface soil at the site in the order in which they will occur including which activities will be conducted by licensee staff and which will be performed by a contractor;			No soils at the site exceed the DCGL limit, therefore, soil remediation has not been planned (Section 8.3)
▪ a description the techniques that will be employed to remove or remediate surface and subsurface soil at the site;			See above comment
▪ a description of the radiation protection methods and control procedures that will be employed during soil removal/remediation;			See above comment
▪ a summary of the procedures already authorized under the existing license and those for which approval is being requested in the decommissioning plan;			See above comment
▪ a commitment to conduct decommissioning activities in accordance with written, approved procedures;			See above comment
▪ a summary of any unique safety or removal/remediation issues associated with remediating the soil; and,			See above comment
▪ for Part 70 licensees, a summary of how the licensee will ensure that the risks addressed in the facility's Integrated Safety Analysis will be addressed during decommissioning.	**NA**		
8.4 SURFACE AND GROUNDWATER			
▪ a summary of the remediation tasks planned for ground and surface water in the order in which they will occur, including which activities will be conducted by licensee staff and which will be performed by a contractor;			There is no surface water or groundwater that contains residual radioactivity in excess of site background levels, and remediation activities are not planned (Section 8.4)
▪ a description the remediation techniques that will be employed to remediate the ground or surface water;			See above comment
▪ a description of the radiation protection methods and control procedures that will be employed during ground or surface water remediation			See above comment
▪ a summary of the procedures already authorized under the existing license and those for which approval is being requested in the decommissioning plan			See above comment

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	NRC	MDNR	
▪ a commitment to conduct decommissioning activities in accordance with written, approved procedures; and,			See above comment
▪ a summary of any unique safety or remediation issues associated with remediating the ground or surface water.			See above comment
8.5 SCHEDULES			
▪ a Gantt or PERT chart detailing the proposed remediation tasks in the order in which they will occur			Section(s): 8.5 Figure(s): 8-2
▪ a statement acknowledging that the dates in the schedule are contingent on NRC approval of the decommissioning plan;			Section(s): 8.5
▪ a statement acknowledging that circumstances can change during decommissioning, and, if the licensee determines that the decommissioning cannot be completed as outlined in the schedule, the licensee or responsible party will provide an updated schedule to NRC; and,			Section(s): 8.5
▪ If the decommissioning is not expected to be completed within the timeframes outlined in NRC regulations, a request for alternative schedule for completing the decommissioning			Section(s): 8.5
9.0 PROJECT MANAGEMENT AND ORGANIZATION			
9.1 DECOMMISSIONING MANAGEMENT ORGANIZATION			
▪ a description of the decommissioning organization			Section(s): 9.1
▪ a description of the responsibilities of each of these decommissioning project units;			Section(s): 9.1, 9.3
▪ description of the reporting hierarchy within the decommissioning project management organization			Section(s): 9.1
▪ a description of the responsibility and authority of each unit to ensure that decommissioning activities are conducted in a safe manner and in accordance with approved written procedures			Section(s): 9.1, 9.3

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	NRC	MDNR	
9.2 DECOMMISSIONING TASK MANAGEMENT			
▪ a description of the manner in which the decommissioning tasks are managed			Section(s): 9.2
▪ a description of how individual decommissioning tasks are evaluated and how the RWPs are developed for each task;			Section(s): 9.2
▪ a description of how the RWPs are reviewed and approved by the decommissioning project management organization;			Section(s): 9.2
▪ a description of how RWPs are managed throughout the decommissioning project			Section(s): 9.2
▪ a description of how individuals performing the decommissioning tasks are informed of the procedures in the RWP			Section(s): 9.2
9.3 DECOMMISSIONING MANAGEMENT POSITIONS AND QUALIFICATIONS			
▪ a description of the duties and responsibilities of each management position in the decommissioning organization and the reporting responsibility of the position;			Section(s): 9.3
▪ a description of the duties and responsibilities of each chemical, radiological, physical and occupational safety-related position in the decommissioning organization and the reporting responsibility of the position;			Section(s): 9.3
▪ a description of the duties and responsibilities of each engineering, quality assurance, and waste management position in the decommissioning organization and the reporting responsibility of the position			Section(s): 9.3
▪ the minimum qualifications for each of the positions describe above, and the qualifications of the individuals currently occupying the positions			Section(s): 9.3
▪ a description of all decommissioning and safety committees			Section(s): 9.3
9.3.1 Radiation Safety Officer			
▪ a description of the health physics and radiation safety education and experience required for individuals acting as the licensee's or responsible party's RSO			Section(s): 9.3.3

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	NRC	MDNR	
▪ a description of the responsibilities and duties of the RSO; and			Section(s): 9.3.3
▪ a description of the specific authority of the RSO to implement and manage the licensee's or responsible party' radiation protection program			Section(s): 9.3.3
9.4 TRAINING			
▪ a description of the radiation safety training that the licensee will provide to each employee			Section(s): 9.4
▪ a description of any daily worker "jobside" or "tailgate" training that will be provided at the beginning of each workday or job task to familiarize workers with job-specific procedures or safety requirements			Section(s): 9.2, 9.4
▪ a description of the documentation that will be maintained to demonstrate that training commitments are being met.			Section(s): 9.4
9.5 CONTRACTOR SUPPORT			
▪ a summary of decommissioning tasks that will be performed by contractors			Section(s): 9.5
▪ a description of the management interfaces that will be in place between the licensee or responsible party's management and on-site supervisors and contractor management and on-site supervisors;			Section(s): 9.5
▪ a description of the oversight responsibilities and authority that the licensee or responsible party will exercise over contractor personnel;			Section(s): 9.5
▪ a description of the training that will be provided to contractor personnel by the licensee or responsible party and the training that will be provided by the contractor			Section(s): 9.5
▪ a commitment that the contractor will comply with all radiation safety and license requirements at the facility.			Section(s): 9.5

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	NRC	MDNR	
10.0 HEALTH AND SAFETY PROGRAM DURING DECOMMISSIONING **RADIATION SAFETY CONTROLS AND MONITORING FOR WORKERS**			
10.1 AIR SAMPLING PROGRAM			
▪ a description which demonstrates that the air sampling program is representative of the workers breathing zones			Section(s): 10.1.1
▪ a description of the criteria which demonstrates that air samplers with appropriate sensitivities will be used; and that samples will be collected at appropriate frequencies			Section(s): 10.1.1
▪ a description of the conditions under which air monitors will be used			Section(s): 10.1.1
▪ a description of the criteria used to determine the frequency of calibration of the flow meters on the air samplers			Section(s): 10.1.1
▪ a description of the action levels for air sampling results			Section(s): 10.1.1
▪ a description of how minimum detectable activities [MDA] for each specific radionuclide that may be collected in air samples are determined			Section(s): 10.1.1
10.2 RESPIRATORY PROTECTION PROGRAM			
▪ a description of the process controls, engineering controls or procedures to control concentrations of radioactive materials in air;			Section(s): 10.1.2 and its subsections
▪ a description of the evaluation which will be performed when it is not practical to apply engineering controls or procedures			Section(s): 10.1.2 and its subsections
▪ a description of the considerations used which demonstrates respiratory protection equipment is appropriate for a specific task based on the guidance on assigned protection factors;			Section(s): 10.1.2 and its subsections
▪ a description of the medical screening and fit testing required before workers will use any respirator that is assigned a protection factor;			Section(s): 10.1.2 and its subsections
▪ a description of the written procedures maintained to address all the elements of the respiratory protection program;			Section(s): 10.1.2 and its subsections
▪ a description of the use, maintenance, and storage of respiratory protection devices			Section(s): 10.1.2 and its subsections

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	NRC	MDNR	
▪ a description of the respiratory equipment users training program;			Section(s): 10.1.2 and its subsections
▪ a description of the considerations made when selecting respiratory protection equipment			Section(s): 10.1.2 and its subsections
10.3 INTERNAL EXPOSURE DETERMINATION			
▪ a description of the monitoring to be performed to determine worker exposure			Section(s): 10.1.3
▪ a description of how worker intakes are determined using measurements of quantities of radionuclides excreted from, or retained in the human body			Section(s): 10.1.3
▪ a description of how worker intakes are determined by measurements of the concentrations of airborne radioactive materials in the workplace.			Section(s): 10.1.3
▪ a description of how worker intakes, for an adult, a minor, and a declared pregnant woman are determined using any combination of the measurements above as may be necessary			Section(s): 10.1.3
▪ a description of how worker intakes are converted into committed effective dose equivalent			Section(s): 10.1.3
10.4 EXTERNAL EXPOSURE DETERMINATION			
▪ a description of the individual-monitoring devices which will be provided to workers			Section(s): 10.1.4
▪ a description of the type, range, sensitivity, and accuracy of each individual-monitoring device;			Section(s): 10.1.4
▪ a description of the use of extremity and whole body monitors when the external radiation field is non-uniform			Section(s): 10.1.4
▪ a description of when audible-alarm dosimeters and pocket dosimeters will be provided			Section(s): 10.1.4
▪ a description of how external dose from airborne radioactive material is determined			Section(s): 10.1.4
▪ a description of the procedure to insure that surveys necessary to supplement personnel monitoring are performed			Section(s): 10.1.4
▪ a description of the action levels for worker's external exposure, and the technical bases and actions to be taken when they are exceeded.			Section(s): 10.1.4

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	NRC	MDNR	
10.5 SUMMATION OF INTERNAL AND EXTERNAL EXPOSURES			
▪ a description of how the internal and external monitoring results are used to calculate TODE and TEDE doses to occupational workers;			Section(s): 10.1.4.1
▪ a description of how internal doses to the embryo/fetus, which is based on the intake of an occupationally-exposed, declared, pregnant woman will be determined;			Section(s): 10.1.4.1
▪ a description of the monitoring of the intake of a declared, pregnant woman if determined to be necessary;			Section(s): 10.1.4.1
▪ a description of the program for the preparation, retention and reporting of records for occupational radiation exposures;			Section(s): 10.1.4.1
10.6 CONTAMINATION CONTROL PROGRAM			
▪ a description of the written procedures to control access to, and stay time in, contaminated areas by workers if they are needed			Section(s): 10.1.5
▪ a description of surveys to supplement personnel monitoring for workers during routine operations, maintenance, clean-up activities, and special operations;			Section(s): 10.1.5, 10.1.5.1
▪ a description of the surveys which will be performed to determine the baseline of background radiation levels and radioactivity from natural sources for areas where decommissioning activities will take place;			Section(s): 10.1.5
▪ a description in matrix or tabular form which describes contamination action limits (that is, actions taken to either decontaminate a person, place or area, or restrict access, or modify the type or frequency of radiological monitoring)			Section(s): 10.1.5.2 Table(s): 10-1, 10-2
▪ a description (included in the matrix or table mentioned above) of proposed radiological contamination guidelines for specifying and modifying the frequency for each type of survey used to assess the reduction of total contamination			Table(s): 10-1, 10-2
▪ a description of the procedures used to test sealed sources, and to insure that sealed sources are leak tested at appropriate intervals			
▪ *description of procedures to release equipment and materials from the site.*			Section(s): 10.1.5 Table(s): 10-1

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	NRC	MDNR	
10.7 INSTRUMENTATION PROGRAM			
▪ a description of the instruments to be used to support the health and safety program;			Section(s): 10.1.6 Table(s): 10-3
▪ a description of instrumentation storage, calibration and maintenance facilities for instruments used in field surveys;			Section(s): 10.1.6.1
▪ a description of the method used to estimate the MDC or MDA (at the 95% confidence level) for each type of radiation to be detected;			We will use the MARSSIM method
▪ a description of the instrument calibration and quality assurance procedures;			Section(s): 10.1.6.2
▪ a description of the methods used to estimate uncertainty bounds for each type of instrumental measurement;			Section(s): 10.1.6.2
▪ a description of air sampling calibration procedures or a statement that the instruments will be calibrated by an accredited laboratory;			Section(s): 10.1.6.2
▪ *A statement committing that: "instruments will be calibrated using calibration sources that are traceable to NIST for the appropriate type and energies for the radionuclides present at the site."*			Section(s): 10.1.6.2
10.8 NUCLEAR CRITICALITY SAFETY			
▪ a description of how the NCS functions, including management responsibilities and technical qualifications of safety personnel, shall be maintained when needed throughout the decommissioning process;	**NA**		
▪ a description of how an awareness of procedures and other items relied on for safety shall be maintained throughout decommissioning among all personnel with access to systems that may contain fissionable material in sufficient amounts for criticality;	**NA**		
▪ a summary of the review of NCSA's or the ISA indicating either that the process needs no new safety procedures or requirements, or that new requirements or analysis have been performed; and	**NA**		
▪ a summary of any generic NCS requirements to be applied to general decommissioning, decontamination, or dismantlement operations, including those dealing with systems that may unexpectedly contain fissionable material.	**NA**		

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	NRC	MDNR	
10.9 HEALTH PHYSICS AUDITS, INSPECTIONS, AND RECORD-KEEPING PROGRAM.			
▪ a general description of the ~~annual~~ program review conducted by ~~executive management~~ *radiation safety committee (RSC)*			Section(s): 10.3
▪ a description of the records to be maintained of the ~~annual~~ program review and ~~executive~~ *RSC* audits			Section(s): 10.3
▪ a description of the types and frequencies of surveys and audits to be performed by the RSO and RSO staff			Section(s): 10.3
▪ a description of the process used in evaluating and dealing with violations of NRC requirements or license commitments identified during audits	**NA**		
▪ a description of the records maintained of RSO audits			Section(s): 10.3
11.0 ENVIRONMENTAL MONITORING AND CONTROL PROGRAM			
11.1 ENVIRONMENTAL ALARA EVALUATION PROGRAM			
▪ a description of ALARA goals for effluent control;		**NA**	Section(s): 11.0, 11.1
▪ a description of the procedures, engineering controls, and process controls to maintain doses ALARA		**NA**	Section(s): 11.1
▪ a description of the ALARA reviews and reports to management.		**NA**	Section(s): 11.1
11.2 EFFLUENT MONITORING PROGRAM			
▪ a demonstration that background and baseline concentrations of radionuclides in environmental media have been established through appropriate sampling and analysis; *The licensee needs to address the presence of radon, since this could confound sampling measurements for thorium;*		**NA**	Section(s): 11.2
▪ a description of the known or expected concentrations of radionuclides in effluents;		**NA**	Section(s): 11.2
▪ a description of the physical and chemical characteristics of radionuclides in effluents;		**NA**	Section(s): 11.2

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	NRC	MDNR	
▪ a summary or diagram of all effluent discharge locations;		**NA**	Section(s): 11.2
▪ a demonstration that samples will be representative of actual releases;		**NA**	Section(s): 11.2
▪ a summary of the sample collection and analysis procedures		**NA**	Section(s): 11.2
▪ a summary of the sample collection frequencies;		**NA**	Section(s): 11.2
▪ a description of the environmental monitoring recording and reporting procedures; and		**NA**	Section(s): 11.2
▪ a description of the quality assurance program to be established and implemented for the effluent monitoring program		**NA**	Section(s): 11.2
11.3 EFFLUENT CONTROL PROGRAM			
▪ a description of the controls that will be used to minimize releases of radioactive material to the environment;		**NA**	Section(s): 11.3 The no action alternative does not include decommissioning activities for which there is a credible potential for effluent releases to the environment. There are no current or projected future releases from the site to monitored or controlled.
▪ a summary of the action levels and description of the actions to be taken should a limit be exceeded;		**NA**	Section(s): 11.3
▪ a description of the leak detection systems for ponds, lagoons, and tanks;		**NA**	Section(s): 11.3
▪ a description of the procedures to ensure that releases to sewer systems are controlled and maintained to meet the requirements of 10 CFR 20.2003, and		**NA**	Section(s): 11.3
▪ a summary of the estimates of doses to the public from effluents and a description of the method used to estimate public dose *per 10CFR Part 20, Appendix B limits.*		**NA**	Section(s): 11.3

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	NRC	MDNR	
12.0 RADIOACTIVE WASTE MANAGEMENT PROGRAM			
12.1 SOLID RADWASTE			
▪ a summary of the types of solid radwaste that are expected to be generated during decommissioning operations			Section(s): 12.1 It is not expected that radioactive waste in any form will be generated during decommissioning work activities at the site. However, wastes that will be generated during decommissioning activities are addressed.
▪ a summary of the estimated volume, in cubic feet, of each solid radwaste type summarized under bullet 1 above;			Section(s): 12.1
▪ a summary of the radionuclides (including the estimated activity of each radionuclide) in each estimated solid radwaste type summarized under bullet 1 above;			Section(s): 12.1
▪ a summary of the volumes of Class A, B, C and Greater-than-Class-C solid radwaste that will be generated by decommissioning operations;			Section(s): 12.1
▪ a description of how and where each of the solid radwaste summarized under bullet 1 above, will be stored on-site prior to shipment for disposal;			Section(s): 12.1
▪ a description of how the each of the solid radwastes summarized under bullet 1 above, will be treated and packaged to meet disposal site acceptance criteria prior to shipment for disposal;			Section(s): 12.1
▪ if appropriate, how the licensee or responsible party intends to manage volumetrically contaminated material;			Section(s): 12.1
▪ a description of how the licensee or responsible party will prevent contaminated soil, or other loose solid radwaste, from being re-disbursed after exhumation and collection; and the name and location of the disposal facility that the licensee intends to use for each solid radwaste type summarized under bullet 1 above			Section(s): 12.1

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	NRC	MDNR	
12.2 LIQUID RADWASTE			
▪ a summary of the types of liquid radwaste that are expected to be generated during decommissioning operations			Section(s): 12.2 It is not expected that liquid radioactive waste will be generated during decommissioning activities.
▪ a summary of the estimated volume, in liters, of each liquid radwaste type summarized under bullet 1 above;			Section(s): 12.2
▪ a summary of the radionuclides (including the estimated activity of each radionuclide) in each liquid radwaste type summarized under bullet 1 above;			Section(s): 12.2
▪ a summary of the estimated volumes of Class A, B, C and Greater-than-Class-C liquid radwaste that will be generated by decommissioning operations;			Section(s): 12.2
▪ a description of how and where each of the liquid radwastes summarized under bullet 1 above, will be stored on-site prior to shipment for disposal;			Section(s): 12.2
▪ a description of how the each of the liquid radwastes summarized under bullet 1 above, will be treated and packaged to meet disposal site acceptance criteria prior to shipment for disposal;			Section(s): 12.2
▪ the name and location of the disposal facility that the licensee intends to use for each liquid radwaste type summarized under bullet 1 above			Section(s): 12.2
12.3 MIXED WASTE			
▪ a summary of the types of solid and liquid mixed waste that are expected to be generated during decommissioning operations;			Section(s): 12.3 It is not expected that mixed waste will be generated during decommissioning activities.
▪ a summary of the estimated volumes, in cubic feet of each solid mixed waste type summarized under bullet 1 above and in liters for each liquid mixed waste;			Section(s): 12.3

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	NRC	MDNR	
▪ a summary of the radionuclides (including the estimated activity of each radionuclide) in each type of mixed waste type summarized under bullet 1 above;			Section(s): 12.3
▪ a summary of the estimated volumes of Class A, B, C and Greater-than-Class-C mixed waste that will be generated by decommissioning operations;			Section(s): 12.3
▪ a description of how and where each of the mixed wastes summarized under bullet 1 above, will be stored on-site prior to shipment for disposal;			Section(s): 12.3
▪ a description of how the each of the mixed wastes summarized under bullet 1 above, will be treated and packaged to meet disposal site acceptance criteria prior to shipment for disposal;			Section(s): 12.3
▪ the name and location of the disposal facility that the licensee intends to use for each mixed waste type summarized under bullet 1 above;			Section(s): 12.3
▪ a discussion of the requirements of all other regulatory agencies having jurisdiction over the mixed waste; and,			Section(s): 12.3
▪ a demonstration the that the licensee possess the appropriate EPA or State permits to generate, store and/or treat the mixed wastes;			Section(s): 12.3
13.0 QUALITY ASSURANCE PROGRAM			
13.1 ORGANIZATION			
▪ a description of the QA program management organization,			Section(s): 13.1 The magnitude of planned D&D activities on site is minimal, working only with non-contaminated structures and systems. Section 13 provides a detailed description of the QA Program that addresses the minimal requirements for the work to be performed on site.
▪ a description of the duties responsibilities of each unit within the organization and how delegation of responsibilities is managed within the decommissioning program			Section(s): 13.1

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	NRC	MDNR	
▪ a description of how work performance is evaluated;			Section(s): 13.5, 13.7
▪ a description of the authority of each unit within the QA program			Section(s): 13.1
▪ an organization chart of the QA program organization			Section(s): 9.0 Due to the limited planned activities, there will be only one person assigned to the QA organization.
13.2 QUALITY ASSURANCE PROGRAM			
▪ a commitment that activities affecting the quality of site decommissioning will be subject to the applicable controls of the QA program and activities covered by the QA program are identified on program defining documents;			Section(s): 13.2.1
▪ a brief summary of ~~the company's corporate~~ *site specific* QA policies;			Section(s): 13.2.1
▪ a description of provisions to ensure that technical and quality assurance procedures required to implement the QA program are consistent with regulatory, licensing, and QA program requirements and are properly documented and controlled;			Section(s): 13.2.1
▪ a description of the ~~management~~ *RSC* reviews, including the documentation of concurrence in these quality-affecting procedures;			Section(s): 13.2.2
▪ a description of the quality-affecting procedural controls *required* of the principal contractors			Section(s): 13.2.2
▪ a description of how NRC will be notified of changes (a) for review and acceptance in the accepted description of the QA program as presented or referenced in the DP before implementation and (b) in organizational elements within 30 days after the announcement of the changes			Section(s): 13.2.2
▪ a description is provided of how management regularly assesses the scope, status, adequacy, and compliance of the QA program;			Section(s): 13.2.4
▪ a description of the instruction provided to personnel responsible for performing activities affecting quality			Section(s): 13.2.3

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	NRC	MDNR	
▪ a description of the training and qualifications of personnel verifying activities for formal training and qualification programs, documentation includes the objectives and content of the program, attendees, and date of attendance;			Section(s): 13.2.3
▪ a description of the self-assessment program to confirm that activities affecting quality comply with the QA program;			Section(s): 13.2.3
▪ a commitment that persons performing self-assessment activities are *individuals in the organization but who are not the individual(s) who actually performed the work* ~~not to have direct responsibilities in the area~~ they are assessing;			Section(s): 13.2.3
▪ a description of the organizational responsibilities for ensuring that activities affecting quality are (a) prescribed by documented instructions, procedures, and drawings; and, (b) accomplished through implementation of these documents; and,			Section(s): 13.2.1, 13.2.2
▪ a description of the procedures to ensure that instructions, procedures, and drawings include quantitative acceptance criteria and qualitative acceptance criteria for determining that important activities have been satisfactorily performed.			Section(s): 13.2.1, 13.2.2
13.3 DOCUMENT CONTROL			
▪ a summary of the types of QA documents that are included in the program			Section(s): 13.3
▪ a description of how the licensee or responsible party develops, issues, revises and retires QA documents			Section(s): 13.3
13.4 CONTROL OF MEASURING AND TEST EQUIPMENT			
▪ a summary of the test and measurement equipment used in the program			Section(s): 13.4
▪ description of how and at what frequency the equipment will be calibrated;			Section(s): 13.4
▪ a description of the daily calibration checks that will be performed on each piece of test or measurement equipment;			Section(s): 13.4
▪ a description of the documentation that will be maintained to demonstrate that only properly calibrated and maintained equipment was used during the decommissioning			Section(s): 13.4

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	NRC	MDNR	
13.5 CORRECTIVE ACTION			
▪ a description of the corrective action procedures for the facility, including a description of how the corrective action is determined to be adequate;			Section(s): 13.5
▪ a description of the documentation maintained for each corrective action and any follow-up activities by the QA organization after the corrective action is implemented;			Section(s): 13.5
13.6 QUALITY ASSURANCE RECORDS			
▪ a description of the manner in which the QA records will be managed			Section(s): 13.6
▪ a description of the responsibilities of the QA organization			Section(s): 13.6
▪ a description of the QA records storage facility.			Section(s): 13.6
13.7 AUDITS AND SURVEILLANCES			
▪ a description of the audit program			Section(s): 13.7
▪ a description of the records and documentation generated during the audits and the manner in which the documents are managed			Section(s): 13.7
▪ a description of all follow-up activities associated with audits or surveillances			Section(s): 13.7
▪ a description of the trending/tracking that will be performed on the results of audits and surveillances			Section(s): 13.7
14.0 FACILITY RADIATION SURVEYS			
14.1 RELEASE CRITERIA			
▪ a summary table or list of the $DCGL_W$ for each radionuclide and impacted media of concern;			Section(s): 14.1
▪ if Class 1 survey units are present, a summary table or list of area factors that will be used for determining a $DCGL_{EMC}$ for each radionuclide and media of concern;		**NA**	Class 1 survey units are not present

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	NRC	MDNR	
▪ if Class 1 survey units are present, the $DCGL_{EMCs}$ for each radionuclide and medium of concern;		**NA**	Class 1 survey units are not present
▪ if multiple radionuclides are present, the appropriate $DCGL_W$ for the survey method to be used.			Section(s): 14.1
14.2 CHARACTERIZATION SURVEYS			
▪ a description and justification of the survey measurements for impacted media			Section(s): 14.2 It is not expected that additional characterization surveys will be performed during the remaining decommissioning activities. However, past characterization surveys are described as a basis and justification for the design of the FSS.
▪ description of the field instruments and methods that were used for measuring concentrations and the sensitivities of those instruments and methods;			Section(s): 14.2
▪ a description of the laboratory instruments and methods that were used for measuring concentrations and the sensitivities of those instruments and methods;			Section(s): 14.2
▪ the survey results including tables or charts of the concentrations of residual radioactivity measured;			Section(s): 14.2
▪ maps or drawings of the site, area, or building showing areas classified as non-impacted or impacted			Section(s): 14.2 Figure(s): 14-13
▪ justification for considering areas to be non-impacted;			Section(s): 14.2
▪ a discussion of why the licensee considers the characterization survey to be adequate to demonstrate that it is unlikely that significant quantities of residual radioactivity have gone undetected;			Section(s): 14.2
▪ for areas and surfaces that are inaccessible or not readily accessible, a discussion of how they were surveyed or why they did not need to be surveyed;			Section(s): 14.2

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	NRC	MDNR	
▪ for sites, areas, or buildings with multiple radionuclides, a discussion justifying the ratios of radionuclides that will be assumed in the final status survey or an indication that no fixed ratio exists and each radionuclide will be measured separately.			Section(s): 14.2.6
14.3 REMEDIAL ACTION SUPPORT SURVEYS			
▪ a description of field screening methods and instrumentation;			Section(s): 14.3 It is not expected that remedial action support surveys will be performed.
▪ a demonstration that field screening should be capable of detecting residual radioactivity at the DCGL;		**NA**	Section(s): 14.3
14.4 FINAL STATUS SURVEY DESIGN			
▪ a brief overview describing the final status survey design.			Section(s): 14.4, 14.4.3 Section 14.4.3 presents the basic design of the FSS for surface soils to be used to demonstrate that the final radiological status of the Site complies with the required radiological conditions. It is not necessary to perform a FSS for subsurface soils because even at the specific activity limit for Th-232, the annual dose limit is not exceeded.
▪ a description and map or drawing of impacted areas of the site, area, or building classified by residual radioactivity levels (Class 1, Class 2, or Class 3) and divided into survey units with an explanation of the basis for division into survey units.			Section(s): 14.4.3 Figure(s): 14-13
▪ a description of the background reference areas and materials, if they will be used, and a justification for their selection.			Section(s): 14.4.3
▪ a summary of the statistical tests that will be used to evaluate the survey results,			Section(s): 14.4.3, 14.4.4
▪ a description of scanning instruments, methods, calibration, operational checks, coverage, and sensitivity for each media and radionuclide.			Section(s): 14.4.5

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	NRC	MDNR	
▪ for in-situ sample measurements made by field instruments, a description of the instruments, calibration, operational checks, sensitivity, and sampling methods with a demonstration that the instruments and methods have adequate sensitivity.		NA	MDNR does not plan to use in-situ measurement techniques for the FSS.
▪ a description of the analytical instruments for measuring samples in the laboratory, calibration, sensitivity, and methods with a demonstration that the instruments and methods have adequate sensitivity;			Section(s): 14.4.6
▪ a description of how the samples to be analyzed in the laboratory will be collected, controlled, and handled;			Section(s): 14.4.6.1
▪ a description of the final status survey investigation levels and how they were determined			Section(s): 14.4.7
▪ a summary of any significant additional residual radioactivity that was not accounted for during site characterization;			Section(s): 14.4.8
▪ a summary of direct measurement results and/or soil concentration levels in units that are comparable to the DCGL and if data is used to estimate or update the survey unit;			Section(s): 14.4.9
▪ a summary of the direct measurements or sample data used to both evaluate the success of remediation and to estimate the survey unit variance.			Section(s): 14.4.9
14.5 FINAL STATUS SURVEY REPORT *(Decommissioning Plan will include the contents of the Final Status Survey Report)*			
▪ an overview of the results of the final status survey.			Section(s): 14.5 As discussed in NUREG-1727, the information specified here is required to be submitted after the licensee has performed the FSS. MDNR has yet to perform the FSS. Consequently, this information will be provided after completion of the FSS and under separate cover.
▪ a discussion of any changes that were made in the final status survey from what was proposed in the Decommissioning Plan or other prior submittals.			See above comment

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	NRC	MDNR	
▪ a description of the method by which the number of samples was determined for each survey unit;			See above comment
▪ a summary of the values used to determine the numbers of sample and a justification for these values;			See above comment
▪ the survey results for each survey unit include:			See above comment
▪ the number of samples taken for the survey unit;			See above comment
▪ a map or drawing of the survey unit showing the reference system and random start systematic sample locations for Class 1 and 2 survey units and random locations shown for Class 3 survey units and reference areas;			See above comment
▪ the measured sample concentrations;			See above comment
▪ the statistical evaluation of the measured concentrations;			See above comment
▪ judgmental and miscellaneous sample data sets reported separately from the			See above comment
▪ those samples collected for performing the statistical evaluation;			See above comment
▪ a discussion of anomalous data including any areas of elevated direct radiation detected during scanning that exceeded the investigation level or measurement locations in excess of DCGLw.			See above comment
▪ a statement that a given survey unit satisfied the DCGLw and the elevated measurement comparison if any sample points exceeded the DCGLw.			See above comment
▪ a description of any changes in initial survey unit assumptions relative to the extent of residual radioactivity			See above comment
▪ if a survey unit fails, a description of the investigation conducted to ascertain the reason for the failure and a discussion of the impact that the failure has on the conclusion that the facility is ready for final radiological surveys; and			See above comment
▪ if a survey unit fails, a discussion of the impact that the reason for the failure has on other survey unit information.			See above comment

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	NRC	MDNR	
▪ *explain method for resampling*			See above comment
15.0 FINANCIAL ASSURANCE			
15.1 COST ESTIMATE			
▪ a cost estimate that appears to be based on documented and reasonable assumptions;			Section(s): 15.1
15.2 CERTIFICATION STATEMENT			
▪ the certification statement is based on the licensed possession limits and the applicable quantities specified in 10 CFR 30.35, 40.36, or 70.25		**NA**	MDNR is not using one of the three certification amounts prescribed in 10 CFR 30, 40, and 70 as the basis for decommissioning funding allocation.
▪ licensee is eligible to use a certification of financial assurance and, if eligible, that the certification amount is appropriate.		**NA**	MDNR is not using one of the three certification amounts prescribed in 10 CFR 30, 40, and 70 as the basis for decommissioning funding allocation.
15.3 FINANCIAL MECHANISM			
▪ the financial assurance mechanism supplied by the licensee or responsible party consists of one or more of the following instruments:			Section(s): 15.1 "Statement of Intent"
▪ trust fund;		**NA**	
▪ escrow account;		**NA**	
▪ government fund;		**NA**	
▪ certificate of deposit;		**NA**	

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	NRC	MDNR	
▪ deposit of government securities;		**NA**	
▪ surety bond;		**NA**	
▪ letter of credit;		**NA**	
▪ line of credit;		**NA**	
▪ insurance policy;		**NA**	
▪ parent company guarantee;		**NA**	
▪ self guarantee;		**NA**	
▪ external sinking fund;		**NA**	
▪ statement of intent; or	**YES**		Section(s): 15.3 Appendix N
▪ by special arrangements with a government entity assuming custody or ownership of the site		**NA**	
▪ the financial assurance mechanism is an originally signed duplicate.			The originally signed copy of the MDNR's "Statement of Intent" was submitted previously with the site's Decommissioning Funding Plan. A copy of which is included in Appendix N.
▪ the wording of the financial assurance mechanism is identical to the recommended wording provided in Appendix F,			Appendix N
▪ for a licensee regulated under 10 CFR Part 72, a means is identified in the decommissioning plan for adjusting the financial assurance funding level over any storage and surveillance period;	**NA**		
▪ the amount of financial assurance coverage provided by the licensee for site control and maintenance is at least as great as that calculated using the formula provided in this SRP			Section(s): 15.1

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	NRC	MDNR	
16.0 RESTRICTED USE/ALTERNATE CRITERIA			
16.1 RESTRICTED USE			
16.1.1 Eligibility Demonstration			
▪ a demonstration that the benefits of dose reduction are less than the cost of doses, injuries and fatalities; or	**NA**		
▪ a demonstration that the proposed residual radioactivity levels at the site are ALARA	**NA**		
16.1.2 Institutional Controls			
▪ a description of the legally enforceable institutional control(s) and an explanation of how the institutional control is a legally enforceable mechanism;	**NA**		
▪ a description of any detriments associated with the maintenance of the institutional control(s);	**NA**		
▪ a description of the restrictions on present and future landowners;	**NA**		
▪ a description of the entities enforcing, and their authority to enforce, the institutional control(s);	**NA**		
▪ a discussion of the durability of the institutional control(s);	**NA**		
▪ a description of the activities that the entity with the authority to enforce the institutional controls may undertake to enforce the institutional control(s)	**NA**		
▪ the manner in which the entity with the authority to enforce the institutional control(s) will be replaced if that entity is no longer willing or able to enforce the institutional control(s) (this may not be needed for Federal or State entities);	**NA**		
▪ a description of the duration of the institutional control(s), the basis for the duration, the conditions that will end the institutional control(s) and the activities that will be undertaken to end the institutional control(s);	**NA**		

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	NRC	MDNR	
▪ a description of the plans for corrective actions that may be undertaken in the event the institutional control(s) fail; and	**NA**		
▪ a description of the records pertaining to the institutional controls, how and where will they will be maintained, and how the public will have access to the records.	**NA**		
16.1.3 Site Maintenance & Financial Assurance			
▪ a demonstration that an appropriately qualified entity has been provided to control and maintain the site;	**NA**		
▪ a description of the site maintenance and control program and the basis for concluding that the program is adequate to control and maintain the site;	**NA**		
▪ a description of the arrangement or contract with the entity charged with carrying out the actions necessary to maintain control at the site;	**NA**		
▪ a demonstration that the contract or arrangement will remain in effect for as long as feasible, and include provisions for renewing or replacing the contract;	**NA**		
▪ a description of the manner in which independent oversight of the entity charged with maintaining the site will be conducted and what entity will conduct the oversight;	**NA**		
▪ a demonstration that the entity providing the oversight has the authority to replace the entity charged with maintaining the site;	**NA**		
▪ a description of the authority granted to the third party to perform, or have performed, any necessary maintenance activities;	**NA**		
▪ unless the entity is a government entity, a demonstration that the third party is not the entity holding the financial assurance mechanism;	**NA**		
▪ a demonstration that sufficient records evidencing to official actions and financial payments made by the third party are open to public inspection;	**NA**		
▪ a description of the periodic site inspections that will be performed by the third party, including the frequency of the inspections.	**NA**		
▪ a copy of the financial assurance mechanism provided by the licensee or responsible party; and,	**NA**		

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	NRC	MDNR	
▪ a demonstration that the amount of financial assurance provided is sufficient to allow an independent third party to carry out any necessary control and maintenance activities.	**NA**		
16.1.4 Obtaining Public Advice			
▪ a description of how individuals and institutions that may be affected by the decommissioning were identified and informed of the opportunity to provide advice to the licensee or responsible party;	**NA**		
▪ a description of the manner in which the licensee obtained advice from these individuals or institutions;	**NA**		
▪ a description of how the licensee provided for participation by a broad cross-section of community interests in obtaining the advice;	**NA**		
▪ a description of how the licensee provided for a comprehensive, collective discussion on the issues by the participants represented;	**NA**		
▪ a copy of the publicly available summary of the results of discussions, including individual viewpoints of the participants on the issues and the extent of agreement and disagreement among the participants;	**NA**		
▪ a description of how this summary has been made available to the public;	**NA**		
▪ a description of how the licensee evaluated the advice, and the rationale for incorporating, or not incorporating, the advice from affected members of the community into the decommissioning plan.	**NA**		
16.1.5 Dose Modeling And ALARA Demonstration			
▪ a summary of the dose to the average member of the critical group when radionuclide levels are at the DCGL with institutional controls in place, as well as the estimated doses if they are no longer in place;	**NA**		
▪ a summary of the evaluation performed pursuant to Section 7 of this SRP demonstrating that these doses are ALARA;	**NA**		
▪ if the estimated dose to the average member of the critical group could exceed 100 mrem/yr (but would be less than 500 mrem/yr) when the radionuclide levels are at the DCGL, a demonstration that the criteria in 10 CFR 20.1403(e) have been met	**NA**		

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	NRC	MDNR	
16.2 ALTERNATE CRITERIA			
▪ a summary of the dose in TEDE(s) to the average member of the critical group when the radionuclide levels are at the DCGL (considering all man-made sources other than medical);	**NA**		
▪ a summary of the evaluation performed pursuant to Section 7 of this SRP demonstrating that these doses are ALARA;	**NA**		
▪ an analysis of all possible sources of exposure to radiation at the site and a discussion of why it is unlikely that the doses from all man-made sources, other than medical, will be more than 1 mSv/yr (100 mrem/yr);	**NA**		
▪ a description of the legally enforceable institutional control(s) and an explanation of how the institutional control is a legally enforceable mechanism;	**NA**		
▪ a description of any detriments associated with the maintenance of the institutional control(s);	**NA**		
▪ a description of the restrictions on present and future landowners;	**NA**		
▪ a description of the entities enforcing and their authority to enforce the institutional control(s);	**NA**		
▪ a discussion of the durability of the institutional control(s);	**NA**		
▪ a description of the activities that the party with the authority to enforce the institutional controls will undertake to enforce the institutional control(s)	**NA**		
▪ a description of the manner in which the entity with the authority to enforce the institutional control(s) will be replaced if that entity is no longer willing or able to enforce the institutional control(s)	**NA**		
▪ a description of the duration of the institutional control(s), the basis for the duration, the conditions that will end the institutional control(s) and the activities that will be undertaken to end the institutional control(s);	**NA**		

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	NRC	MDNR	
▪ a description of the corrective actions that will be undertaken in the event the institutional control(s) fail; and	**NA**		
▪ a description of the records pertaining to the institutional controls, how and where they will be maintained, and how the public will have access to the records.	**NA**		
▪ a description of how individuals and institutions that may be affected by the decommissioning were identified and informed of the opportunity to provide advice to the licensee or responsible party;	**NA**		
▪ a description of the manner in which the licensee obtained advice from affected individuals or institutions;	**NA**		
▪ a description of how the licensee provided for participation by a broad cross-section of community interests in obtaining the advice;	**NA**		
▪ a description of how the licensee provided for a comprehensive, collective discussion on the issues by the participants represented;	**NA**		
▪ a copy of the publicly available summary of the results of discussions, including individual viewpoints of the participants on the issues and the extent of agreement and disagreement among the participants;	**NA**		
▪ a description of how this summary has been made available to the public; and,	**NA**		
▪ a description of how the licensee evaluated advice from individuals and institutions that could be affected by the decommissioning and the manner in which the advice was addressed.	**NA**		