From: Eric Pogue >NMSS/DWMEP
To: Anthony Huffert
Date: 3/6/01 2:11PM
Subject: Re: Your Input on NAS Questions by 3/13/01

My input is in ***bold italics*** in the attached Table 2. Let me know if you'd like any more info.

thanks-
Eric

>>> Anthony Huffert 03/02 10:47 AM >>>
Fellow Decommissioners -

The Clearance Working Group has been tasked to respond to questions from the National Academy of Science about NRC's clearance practices, resource expenditures on clearance-related activities, and problems with the current approach. In response to the NAS request, each member of the Clearance Working Group is obtaining information from staff that work in their respective program areas, which includes DWM, FCSS, IMNS, NRR, the four Regions, and the Agreement States.

Recently, Don Cool sent an email that forwarded the NAS questions and two accompanying tables for use in preparing responses (attached). DCB has been assigned the lead for DWM's response to the NAS questions. Larry Camper has approved each DCB staff member to spend about one hour reviewing the questions and preparing responses. Your input is needed by Tuesday, March 13th.

During the week of March 5th, Giorgio or I will meet with you to answer questions you may have concerning the NAS questions and Don's email. Please do not hesitate to stop by or call us if you have any questions about this request.

Thanks in advance for your help on this assignment.

Tony

CC: Giorgio Gnugnoli

B/40

Table 2

Specific Request for Regional Input

a) How many cases were reviewed each year, on average, for the past 5 years?

I've been with NRC for ~2 years and have been peripherally involved in several projects where "Clearance" was discussed (e.g. Haddam Neck). However, my only direct involvement would be my review of two 20.2002 disposal requests (II-IV as a TAR from Region I, and University of Missouri, as a TAR from Region III.)

b) How many total staff-years of dedicated time (in FTE) were spent on reviews of cases over the past 5 years (i.e., not spent on decommissioning in general but on the implementation of the current practice for control of solid material)?

A rough estimate of my time spent on these 20.2002 reviews is 0.1 FTE

c) What duration of time does it take to review a case (e.g., how many cases take a month of elapsed time, how many take a year)?

Both of the 2.2002's I was involved with took several months to reach resolution.

d) What factors account for the time spent on a case (research, meetings, documentation, timeliness of licensee response, etc)? What are the major time consumers?

In the case of the 20.2002 reviews, the most time consuming aspect was with the TAR process (i.e. the Region reviewed the licensee's request, prepared a memo to IMNS, IMNS received the TAR and forwarded to DWM, DWM had to communicate with the Region during our review, and then we had to coordinate a meeting with the licensee and the Regional staff, then when we completed the review it went back to the region to prepare the correspondence back to the licensee). In both cases the licensee was very responsive and anxious to get resolution...and therefore did not add to the time in the least. Also one of the reviews took a significant amount of time to conduct dose modeling, and to get technical and legal concurrence on aspects of the modeling.

e) Is the time it takes to resolve a case dependent on the caseload? (If you had more staff, would the perceived turn around time problem be ameliorated or resolved?)

In the case of my two reviews, more staff would not have affected the length of review.

f) Using specific illustrative examples, outline the disadvantages and advantages of the case-by-case approach? What are the real issues and problems (consistency/inconsistency, public perception, time, cost) associated with this approach?

For the 2.2002 reviews I conducted I feel the drawback of the case-by-case approach was timeliness (primarily because of the TAR process and technical and legal hold-ups) and perception of the licensees. By perception of the licensees I mean that in both cases the licensees cited examples of how other licensee's were being treated differently...and therefore it wouldn't be "fair" if we applied a different standard to their

case.

I think the only advantage to the case-by-case approach is that like a lot of the things we deal with at NRC, no two cases are the same. A case-by-case approach allows for more flexibility in this regard [e.g. in the case of one of the disposals I worked on, we knew exactly where the waste was going (an industrial disposal facility) and an argument could be made that a different standard could apply for this type of disposal than an item cleared for "free release"]

g) Cite all known cases in the last 5 years when the system has failed. For example, offsite releases of solid material that were problematic from both policy and technical perspectives because of lack of a national clearance standard or a failure to conduct an adequate survey prior to release. Why have these failures occurred This could include inconsistency in release levels and nonuniform levels of protection, improper guidelines, improper implementation of the guidelines, etc.

No Comment

h) What are the complexities of the existing case-by-case approach to clearance and what makes a licensee's request complex or problematic. Can you give examples of simple and complex cases?

No Comment

<u>Additional question from HQ staff (may be supplied at a later date)</u>

Consistent with the Commission's directive to continue studying technical information, the HQ staff is currently estimating inventories of solid material that could be released from licensed facilities. To help us in this effort, it is requested that you provide information, where available, on volumes and curies of material released for the cases noted above.

I only have information for one of the 20.2002 disposals. The licensee estimated that the volume of material they wished to dispose was 6,881 m^3 and the total activity was 0.258 Curies (Th-232 and its progeny)