

From: Duane Schmidt ^{NMSS/DWM/EP}
To: Claudia Craig
Date: 1/19/05 2:25PM
Subject: NMSS Processing of Requests Under 20.2002

Claudia,

Here is what I and Ted found:

- (1) A letter to Fansteel in 1997 seems to indicate that we would process their request under 20.2002 as a license amendment (it said "separate licensing action").
- (2) Amir said the couple he knew about were done as letters, but that he understood it to be case-specific.
- (3) Nick Baker and Mike Lamastra indicated that FCSS has done them sometimes as license amendments and sometimes as letter approvals. Nick has one expected to come in shortly, and currently expects to do it as a license amendment. Mike said that the more complicated ones usually got license amendments.
- (4) Jim Kennedy is (soon) working on a procedure to standardize our processing of 20.2002 requests. His understanding is that NMSS's intent is that we approve them with license amendments. I'm not sure where that idea comes from, but we can relook at that as his procedure gets worked on (it sounds like he has not done much yet).
- (5) From the old version of our 20.2002 database, there are a small fraction of the entries that indicate how approved. At least four requests have notes indicating that a license amendment was done (or to be done?). This included requests from Sequoyah Fuels, Kerr-McGee Cimarron, Chemetron, and Combustion Engineering.

I conclude that we certainly have done some approvals with a license amendment in NMSS, but it appears some have been done with just letters. Perhaps our response to the TA should be that we have used both methods for past approvals.

Duane.

CC: Duane Schmidt; Theodore Smith

- Bottom line materials not consistent
- Rx - never amendment
- working on process to std
⇒ amendment

B/C