

November 17, 2006

MEMORANDUM TO: A. Randolph Blough, Director
Division of Reactor Safety
Region I

Joseph W. Shea, Director
Division of Reactor Safety
Region II

Cynthia D. Pederson, Director
Division of Reactor Safety
Region III

Dwight D. Chamberlain, Director
Division of Reactor Safety
Region IV

FROM: Elmo E. Collins, Director */RA/*
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

SUBJECT: REQUEST FOR REGIONAL REVIEW OF SITE-SPECIFIC
RESPONSES TO THE NEI GROUND WATER QUESTIONNAIRE

This memorandum is to request your assistance and to provide guidance for the review of the Nuclear Energy Institute (NEI) ground water questionnaire responses for each site in your region. These questionnaire responses were submitted to the Nuclear Regulatory Commission by the licensee for each site as part of the industry voluntary groundwater protection initiative (GPI).

As described in the NEI guidance for the GPI, several short and long term actions are being taken by the industry to not only identify previous spills and leaks of radioactive liquids, but also to evaluate monitoring and remediation capabilities at each site to address these groundwater contamination events. The staff have reviewed the voluntary actions proposed by the industry as part of the GPI, and have concluded that they should be effective if implemented consistently across the industry. However, the staff needs to continue to interact with the industry and monitor and assess the implementation of the GPI to evaluate whether additional regulatory actions are needed to address this issue.

CONTACT: Timothy Frye, NRR/DIRS
(301) 415-9676

Headquarters staff have done a cursory review of the questionnaire responses, and have summarized the results for all sites in attachment 1, "Summary of NEI Ground Water Protection Initiative Questionnaire Plant Response Data." We request that the regional Health Physics inspectors perform a more detailed review of each questionnaire response to assess how complete and accurate the information is that has been provided on the historical spills and leaks for a given site. Regional inspectors should compare the licensee questionnaire responses to information and knowledge previously collected for each site to answer the six worksheet questions found in attachment 2 of this memorandum.

To complete the worksheet each reviewer should gather together previously collected and/or licensee reported information on each site's ground-water monitoring program and methods, ground-water monitoring results, 50.75 (g) file, and any information on past and current remediation efforts. The word "information," for the purposes of this worksheet, is defined as: (1) any knowledge formally or informally collected by regional Health Physics staff and (2) any corporate knowledge an inspector may have acquired during his or her career (this knowledge should have some certainty associated with it, e.g. the inspector is relatively certain that the spill/leak occurred and a large volume was spilled, but is not necessarily certain about the exact details of the leak). The information used in the review need not have been formally docketed. The reviewer should also list all sources of information that were used to complete the worksheet, other than the attached spreadsheet.

It is expected that each review should take no more than four hours per questionnaire. Please send the completed review worksheet to Timothy Frye, Chief, Health Physics Branch, by Friday, January 19, 2007. Time charged for this effort should be charged to TAC No. MD2962.

Enclosures:
As stated

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Enclosures:
As stated

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WORKSHEET TO REVIEW SITE-SPECIFIC NEI GROUND WATER QUESTIONNAIRE
RESPONSES

Operating Utility:
Nuclear Power Plant:
Reviewer:

Circle One

1. Is there any kind of onsite ground water monitoring being performed? If not, skip questions 2 and 5. **Yes** **No**

2. Do the number of onsite ground water sampling locations reported in the questionnaire match the information you have collected previously and any corporate knowledge you are aware of? **Yes** **No**

If not, briefly describe any differences:

3. Review whether onsite and/or offsite contamination was reported. Does this agree with your information? **Yes** **No**

If not, briefly describe why:

4. Do the **number** and **sources** of leaks/spills reported in the questionnaire match your information? **Yes** **No**

If not, briefly describe any differences or reasons why not:

5. Were ground water activity levels greater than EPA limits reported? **Yes** **No**

Does this agree with your information? If not, describe why:

6. Does the site remediate spills or leaks? **Yes** **No**