

**INTEGRATED DECOMMISSIONING IMPROVEMENT PLAN
FY 2007-2009**

Revision 2

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Decommissioning and Uranium Recovery Licensing Directorate
Division of Waste Management and Environmental Protection
Office of Federal and State Materials and Environmental Management Programs
U.S. Nuclear Regulatory Commission

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Attachment 1: DWMEP Procedure 2.1: Program Improvement Planning and Development

INTEGRATED DECOMMISSIONING IMPROVEMENT PLAN FY 2007-2009

1.0 Introduction

1.1 Purpose and scope

The purpose of the U.S. Nuclear Regulatory Commission's (NRC's) Integrated Decommissioning Improvement Plan (IDIP) is to:

- 1) describe a "continuous improvement" plan for decommissioning and
- 2) integrate and document general plans for regulatory improvements and program management improvements during FY 2007-2009 into one plan, regardless of the source.

IDIP documents the first and second steps in the staff's continuous improvement process that is described in the new procedure 2.1, Integrated Improvement Planning and Assessment Process included in the Division of Waste Management and Environmental Protection (DWMEP) Operations Manual (Attachment 1). IDIP Rev. 1 included planned improvements for FY 2005-2007. IDIP Rev. 2 includes an update for planned improvements for FY 2007 and adds planned improvements for FY 2008-2009. These new improvements are based on program assessments in step one of the continuous improvement process. Specifically, these assessments include the Commission's annual program review, the NRC Inspector General's (IG's) independent review, the staff's internal Office of Management and Budget's (OMB) Program Assessment Rating Tool (PART) review, and the staff decommissioning licensing experience.

The scope of IDIP Rev. 2 only includes ongoing and new improvements. Implementation of completed past improvements are not included in IDIP Rev. 2. For example, during FY 2005, numerous improvements were completed and documented as new procedures in the DWMEP Operations Manual. The ongoing activities to implement these procedures are not included in the scope of IDIP Rev. 2. Completed improvements are not included in IDIP Rev. 2., but are documented in the annual report for the Decommissioning Program (NUREG-1814, Rev. 1).

1.2 Content

Section 2.0 provides relevant background. Section 3.0 is an integrated summary of key improvements planned for FY 2007-2009. Section 4.0 describes planned regulatory improvements, Section 5.0 describes planned program management improvements directed by the Commission, Section 6.0 describes other program management improvements resulting from the IG's independent review, the staff's internal PART review, and other staff activities.

2.0 Background

An initial IDIP was prepared in FY 2004 and Rev. 1 was completed in March 2005 to integrate all the staff's regulatory and program management improvements into one plan. In February 2006, the staff completed Rev. 0 of the DWMEP Operations Manual, which included procedure 2.1 Integrated Improvement Planning and Assessment Process (Attachment 1). As already mentioned, this new procedure describes an iterative four step process for continuous improvement of the Decommissioning Program. Step one is to conduct program assessments, such as self assessments using the PART methodology, Commission annual program reviews, Advisory Committee on Nuclear Waste (ACNW) independent reviews, and the IG's independent review to identify areas for possible improvements. Based on these assessments, the second step of planning improvements is conducted and documented in a revision to the IDIP. Using IDIP, improvement efforts are undertaken and results are summarized in an annual Continuous Improvement Report under step three. Step four is to reassess the program on a schedule established by the Agency, such as for the OMB PART review or future independent evaluations, or a staff assessment on a schedule that would result in a meaningful assessment considering many improvements need time to be implemented before their resulting efficiencies can be measured or reassessed. This includes periodically reassessing the regulations, guidance, and implementing licensing process to ensure consistency, completeness, and implementability. This step starts over the iterative process. The staff plans to implement this four step procedure and therefore, revise IDIP as needed, to include results of future reviews such as the OMB PART review scheduled for FY 2007. After completion of an IDIP revision, improvements are incorporated and tracked in the DWMEP Operations Plan. Additional background is given below for regulatory and program management improvements to provide some continuity with past improvement activities.

Completed and ongoing regulatory improvements have been primarily initiated by the results of the staff's License Termination Rule (LTR) Analysis and the related Commission's direction. In June 2002 the Commission directed the staff to conduct an analysis of LTR implementation issues, with particular emphasis on resolving the restricted release and institutional control issues. The staff's analysis and recommendations for eight issues were provided to the Commission on May 2, 2003 (SECY-03-0069), and the Commission approved the staff's recommendations with comments on November 17, 2003. Subsequently, on March 1, 2004, the staff provided the Commission with its analysis of a ninth issue on intentional mixing (SECY-04-0035), and the Commission approved the staff's recommendation, with comments on May 11, 2004. Regulatory improvements, including the ongoing decommissioning guidance and rulemaking/guidance for preventing future legacy sites are a result of the LTR Analysis and these improvements are included in IDIP.

Some ongoing program management improvements also have been directed by the Commission as a result of the staff's annual briefings to the Commission. As a followup to the October 2004 annual briefing, the Commission directed the staff to address the five items listed below (October 22, 2004, SRM-M041013A).

- Capture and share lessons learned and best practices
- Improve radiological monitoring
- Establish measures to provide finality in decommissioning
- Improve consistency among State and Federal regulators
- Enhance guidance to better address issues of flexibility and institutional controls for restricted release

Similarly, as a result of the staff's October 2005 briefing, the Commission directed the staff to:

- Evaluate options to further consolidate elements of the Comprehensive Decommissioning Program into a single organization.

Program management improvements have also resulted from the staff's internal PART review that was conducted to prepare for the formal OMB PART review that had originally been scheduled for FY 2006. However, OMB rescheduled the review until FY 2007. The staff's preparations for the PART review resulted in draft answers to the 31 PART questions and recommended some follow-up improvements.

3.0 Summary of Key Planned Improvements

Improvements Planned in FY 2007

Complete responses to public comments on the draft decommissioning guidance for LTR Analysis issues and other issues addressed in the final guidance completed in FY 2006.

Continue work on proposed rulemaking/supporting guidance for changes in financial assurance and operations for preventing future legacy sites, including groundwater monitoring during facility operations.

Continue work on internal draft inspection procedures and enforcement guidance to implement the proposed rulemaking for preventing future legacy sites.

Continue development of lessons learned collaboration with industry and Agreement States

Prepare a new procedure for obtaining and documenting the data for the program's performance measures

Evaluate potential revisions to guidance for restricted use cost benefit analyses

Conduct OMB PART review and identify commitments to further improve the program

Conduct a program evaluation of decommissioning dose modeling

Evaluate stakeholder recommended decommissioning improvements

Complete proposed rulemaking to prevent future legacy sites to EDO

Improvements Planned in FY 2008

Consistent with Commission direction, publish proposed rulemaking/supporting draft guidance to prevent future legacy sites for public comment.

Develop draft guidance on selected issues and publish as draft guidance for public comment along with draft guidance for rulemaking (e.g., cost benefit analysis for restricted use sites, groundwater monitoring for the decommissioning phase)

Revise IDIP based on PART results and OMB commitments, licensing experience for decommissioning sites (including research and test reactors) and uranium mill tailings sites, evaluation of stakeholder recommended improvements, evaluations of dose modeling and cost benefit guidance

Update methods to measure decommissioning efficiency, including cost and time savings, completed in FY 2006

Complete final rulemaking to prevent future legacy sites to EDO

Improvements Planned in FY 2009

Consistent with Commission direction, publish final rulemaking/supporting final guidance to prevent future legacy sites

Complete final guidance on selected issues (e.g. cost benefit analysis for restricted use sites)

Conduct stakeholder workshop on improvements to the regulations, guidance, and licensing process

4.0 Description of Regulatory Improvements

4.1 Followup work on revised decommissioning guidance

Description:

The final revised guidance was completed in FY 2006 for the LTR Analysis issues and published as a revision to the Consolidated Decommissioning Guidance in NUREG-1757. Followup work during FY 2007 will include completing the responses to public comments and staff training on the revised final guidance.

Milestones and schedules:

Complete responses to public comments and make available on web site	12/06 C
Train staff on final LTR guidance	03/07 C

Assignments:

- Project Management (PM) (Schmidt/Banovac)
- Restricted use/institutional controls (Johnson/Banovac)
- On-site disposal (Youngblood)
- Realistic Scenarios (McKenney)
- Removal of material after license termination (Schmidt/Buckley)
- Intentional mixing of contaminated soil (Watson)

- Engineered barriers (Esh/T. Johnson/R. Johnson)
- Long-term monitoring (Johnson)
- Radiological surveys (McLaughlin)

4.2 Develop new rule and supporting guidance for preventing future legacy sites**Description:**

The work that started during FY 2006 will continue on preparing a new rule and supporting new guidance/revised guidance for the following LTR Analysis issues. This work should address the specific recommendations approved by the Commission in SRM-SECY-03-0069 and other related topics:

- Changes to financial assurance
 - Initial underestimation of decommissioning cost
 - Earlier provisions for soil and groundwater remediation costs
 - Unavailability of funds in bankruptcy
 - Inadequate financial disclosure
 - Reaching assets after corporate reorganization
 - Investment losses reduce trust account balance

- Changes to licensee operations
 - Chronic releases
 - Reporting inadequacies

The staff will use the Office of Federal and State Materials and Environmental Management Programs (FSME) rulemaking process including stakeholder involvement (e.g., ACNW, industry, working group with State participation, and public). Stakeholder involvement began with a Decommissioning Workshop in FY 2005 and the ACNW meeting during FY 2006. These meetings and additional

stakeholder meetings planned for FY 2007 should provide opportunities for input to preparing the proposed rule and guidance.

The Commission directed the staff in SRM-COMSECY-04-0031 to proceed directly to the proposed rule stage, bypassing the development of a separate rulemaking plan because SECY-03-0069 contained the necessary information. A proposed rule and draft supporting guidance would be published for public comment in FY 2008 and the final rule and guidance planned to be published in FY 2009. The financial assurance guidance will be added to NUREG-1757 Vol. 3, Part II on Financial Assurance.

The portion of the rulemaking on the issue Changes to Licensee Operations will be supported with guidance development for monitoring and reporting during facility operations for both inside facilities and outside facilities, including groundwater monitoring. This guidance is coordinated with and will make use of related NRC activities including: 1) the Office of Research project on developing a groundwater monitoring strategy; 2) the Lessons Learned task force for liquid releases from nuclear power plants; and 3) the portion of the Standard Review Plan guidance for new reactors related to 10 CFR 20.1406. Although the focus of the RES project is on the decommissioning and subsequent phases of plant life, the principles of a sound monitoring strategy apply throughout plant life, as does collection of the basic site hydrologic and geologic data. Some of the recommendations from the task force for liquid releases are closely related to the intent of the proposed rulemaking efforts. The resulting guidance will be documented in a NUREG report that can be referenced by the appropriate NRC guidance for operating facilities.

The related work on Revising the Inspection Procedures and Enforcement Guidance for this issue is described in Section 4.3.

Milestones and schedules:

Working Group completes review of internal draft rulemaking	10/06 C
Conduct stakeholder/public meeting	01/07 C
Revise schedule (below) based on input from public meeting	01/07 C
Complete technical basis document	02/07 C
EDO approval and draft rulemaking package to Commission	09/07
EDO approval and final rulemaking package to Commission	09/08

Assignments:

FSME rulemaking PM: O'Sullivan
DWMEP technical PM: Fredrichs
Financial assurance changes: Fredrichs, ICF contractor
Operational changes: Shepherd

Office of Nuclear Regulatory Research (RES)/monitoring: Nicholson, internal
Technical Advisory Group on hydro geology
Office of Nuclear Regulatory Research (NRR): Pittiglio
FCSS: T. Johnson
SFST: Wharten
MSSA: Siurano
OGC legal review: Hull
Region-III: G. McCann
OAST: Conley (KS)

4.3 Revise inspection procedures and enforcement guidance to enhance monitoring, reporting, and remediation to prevent future legacy sites

Description:

New or revised inspection and enforcement guidance/procedures for operating licensees (not decommissioning licensees) will be prepared for the following LTR Analysis issues and should address the specific recommendations approved by the Commission (see SRM-SECY-03-0069).

Measures to prevent future legacy sites

- Changes to licensee operations
- Chronic releases
- Reporting inadequacies

This work consists of two steps. The first step, a report completed during FY 2005, helped scope the inspection and enforcement guidance, including developing a risk-informed approach to identify operating sites with a higher likelihood for subsurface contamination that could cause future decommissioning problems, identifying types of sites or specific sites and activities at these sites for heightened inspection, identifying the types of inspection activities that would be completed at these sites, and the potential inspection procedures that could be revised. This report which is documented in a memorandum (ML052630421), provided the results of the staff review of 82 decommissioning sites. The staff documented which sites had known groundwater and/or subsurface contamination and the sources and causes of contamination. The staff also provided commentary on existing inspection procedures, the extent to which sources and causes of subsurface contamination are the subject of these procedures, and new inspection approaches and general guidance that address sources and causes of contamination.

The second step will develop specific inspection procedures (or revised existing procedures) and enforcement guidance for the types of sites and inspections identified in the first step. The second step will be developed along with the rulemaking and supporting guidance during FY 2007-2008 to ensure consistency between the rulemaking and guidance (see section 4.2). Coordination or participation with Regions and the Office of Enforcement (OE) will be necessary.

Milestones and schedules:

ACNW update	11/06 C
Revise schedule (below) based on revised rulemaking schedule	01/07 C
Complete draft inspection procedures and enforcement guidance	09/07
Complete final inspection procedures and enforcement guidance	09/08

Assignments:

PM: Shepherd
Region reps: G. McCann Region III
OGC legal review: Hull

4.4 Groundwater monitoring guidance for the decommissioning phase

Description:

Guidance for groundwater monitoring is planned for the two phases of a licensed facility lifetime: operations and decommissioning. Section 4.2 addresses the groundwater monitoring for facility operations associated with the rulemaking to prevent future legacy sites. The groundwater monitoring guidance for the decommissioning phase, described in this section, will be included in the guidance developed under Section 4.2. It will also include the results of the RES project for developing a monitoring strategy for confirmation of site conceptual models. The schedule below will be consistent with guidance development support for the rulemaking for preventing future legacy sites. This approach will result in more efficient guidance production and public comment.

Milestones and schedules:

See section 4.2

Assignments:

PM: Shepherd
Office of Research (RES) support: Nicholson

4.5 Evaluate potential revisions to guidance for restricted use cost benefit analyses (CBA)

Description:

As a result of the Decommissioning Plan acceptance review for the Shieldalloy site and the Predecisional Draft Environmental Impact Statement (EIS) review of the West Valley site, the staff recommended that the existing decommissioning guidance for CBA for restricted use sites required by the LTR in 10 CFR 1403(a) and 10 CFR 1403(e)(i), be evaluated to determine how the guidance would be implemented at these two sites. Based on the evaluation, the staff could recommend clarifications or revisions to the existing guidance. A work plan and team assignments were completed during FY 2006. The staff's work will be coordinated by the NRC contractor, Ecology and Environment, for the Shieldalloy EIS.

Milestones and schedule:

Team kickoff meeting and review of plan	11/06 C
Develop background	01/07 C
Conduct Shieldalloy review of CBA	04/07
Consider West Valley PDEIS CBA and NRC comments	06/07
Recommend staff conducting example CBAs and revising guidance	07/07
Management decision on recommendations	09/07

Assignments:

PM: R. Johnson

DWMEP technical support:

West Valley health physics: Watson
Shieldalloy health physics: Schmidt
West Valley dose modeling: Esh
CBA guidance: McKenney

FSME technical support:

CBA: O'Sullivan

DWMEP site project managers: Glenn, Kalman, Suber

Office of the General Counsel (OGC): Hull, Jensen

Contractor coordination: E&E contractor for Shieldalloy EIS

4.6 Knowledge management initiative and additional guidance on erosion controls

Description:

Staff technical reviews during FY 2006 and guidance development during FY 2006 identified potential future improvements. This task would make recommendations for a knowledge management initiative and additional guidance for documenting erosion control lessons learned. Include lessons learned from approved U.S. Department of Energy (DOE) erosion control designs that would be particularly relevant for future erosion control reviews at decommissioning sites such as West Valley and Shieldalloy and uranium mill tailings sites. The task could document how challenging erosion and rock durability issues were addressed by past NRC reviews as well as some relevant State and Federal studies. The task could also evaluate the use of natural and archeological/historical analogues as evidence for long-term stability of erosion control designs and durability of rock selected for erosion covers. The product could be a NUREG report or revisions to the Consolidated Decommissioning Guidance in NUREG-1757, depending on the management decision. If guidance is developed, it would be coordinated and prepared along with guidance for other topics identified in IDIP Rev. 2

Milestones and schedules:

Recommend scope of new guidance and lessons learned	08/07
Management decision and schedule for approved recommendations	09/07
Potential development of NUREG and/or draft guidance	09/08
Potential development of final guidance	09/09

Assignments:

PM: T. Johnson, R. Johnson

4.7 Other LTR Analysis recommendations approved by the Commission

4.7.1 Restricted Use—reevaluate potential for site transfers to the DOE under the Nuclear Waste Policy Act (NWPA), Section 151(b) (Johnson)

There is no need to evaluate this item at this time because the staff plans on continuing to implement the Commission’s direction for the LTC license or NRC Legal Agreement/Restrictive Covenant (LA/RC).

4.7.2 Restricted Use—continue to monitor agency activities (DOE Legacy Management, U.S. Environmental Protection Agency (EPA) , Ohio) (Johnson)

Description:

Continue to monitor and exchange information from DOE, EPA, and Ohio regarding use of institutional controls (ICs). Activities might include attending meetings and reviewing new EPA guidance or participating in future agency exchanges on IC. For example during FY 2006, the staff participated in the EPA, DOE, NRC workshop sponsored by The Consortium for Risk Evaluation with Stakeholder Participation (CRESP) or the EPA workshop on IC, and the EPA workshop on IC.

Milestones and schedule:

DOE/NAS workshop on DOE cleanup	03/07 C
Review new EPA guidance and workshop papers on IC	09/07
State of Ohio meeting on status of the Shieldalloy site in Ohio	09/07

Assignments: Johnson, Banovac, Hull/Jensen (OGC)

4.7.3 Restricted Use—Long-Term Control (LTC) license: Frequently asked questions and new internal guidance

Description:

Prepare frequently asked questions (FAQs) for restricted use, LTC license, and LA/RC, and make available on the Decommissioning web site. Use information from the NUREG-1757 comment responses, staff experience from the Shieldalloy public meetings, NJ petitions, and Shieldalloy DP hearing requests. The FAQs will improve stakeholder understanding, particularly for the Shieldalloy, NJ and West Valley, NY sites.

Prepare a new section for the NRC Manual Chapter for possession-only specific licenses. Describe the new LTC possession only specific license to distinguish it from the existing possession only license for storage. Use existing descriptions from the revised NUREG-1757.

Milestones and schedule:

Frequently asked questions	09/07
Develop scope, outline of new section and schedule for Manual Chapter for the LTC license.	09/07

Assignments: R. Johnson

5.0 Description of Program Management Improvements directed by the Commission

These improvements resulted from the Commission's direction in the SRMs from the annual briefings for the Commission.

5.1 Capture and share lessons learned and best practices

Description:

Continue the development started in FY 2006, of a collaborative approach with industry and Agreement States to identify, document, and make decommissioning lessons learned available. Continue to add NRC lessons learned from licensing actions to the Decommissioning Web page. Plan, conduct, or participate in lessons learned sessions at conferences.

Milestones and schedules:

ACNW review of Lessons Learned	11/06 C
Participate in International Atomic Energy Agency (IAEA) meeting on decommissioning lessons learned	12/06 C
ACNW presentation on IAEA lessons learned meeting	02/07 C
Evaluate potential for redesign of Lessons Learned (LL) web page	09/07
Publication of new NRC LL from ongoing decommissioning projects	09/07

Assignments:

PM: Rodriguez

5.2 Radiological monitoring (McLaughlin)

This improvement was part of the final revised guidance under section 4.1 and was completed in FY 2006. The only FY 2007 action is the staff training listed under section 4.1.

5.3 Finality of decommissioning process

Description:

This activity involves staff continuing to work with EPA and licensees to implement the EPA-NRC Memorandum of Understanding (MOU) as was done during FY 2005 and FY 2006.

Milestones and schedule:

Prepare Level 2 Consultation Letter to EPA for Kaiser	12/06 C
Prepare Level 2 Consultation Letter for Battelle	03/07 C
Evaluate EPA's Response on Cabot and prepare response letter to EPA	06/07
Provide periodic training to project managers, Regions on MOU	periodic

Assignments:

PM: Rodriguez and site Project Managers

5.4 Consistency among State and Federal regulators

Description:

Update Agreement States on NRC decommissioning issues at annual Organization of Agreement States (OAS) meeting, including inform/provide Agreement States with the Final Decommissioning Guidance for LTR issues. Continue OAS working group participation with rulemaking to prevent future legacy sites.

Note that it should not be expected that this work will achieve consistency where some States prefer more stringent requirements, but it will keep Agreement States informed.

Milestones and schedules:

Annual CRCPD meeting	05/07
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Assignments:

PM: Rodriguez

5.5 Enhance guidance on flexibility and institutional controls for restricted use

Final guidance was completed in FY 2006 (see section 4.1 above) that included enhancing flexibility in the decommissioning process for use of restricted use/institutional controls and engineered barriers. The remaining activity in FY 2007 is to provide staff training on the final revised guidance.

5.6 Evaluate further consolidation of decommissioning activities

Description:

As a followup to the October 2005 annual briefing to the Commission, on November 7, 2005, the Commission directed the staff (SRM M051018) to review various aspects of NRC's decommissioning program and provide the Commission with possible options for further consolidation of the program in one division.

During FY 2006, this task involved evaluating options and preparing a Commission paper to inform the Commission of staff actions to further consolidate the decommissioning program, including transfer of research and test reactor decommissioning (RTRs) from NRR and uranium recovery site decommissioning from FCSS. The transfer of uranium recovery site decommissioning is part of the larger reorganization. Also included under this task are transition plans and activities to implement the approved transfers such as staff training, PM knowledge transfer, and informing licensees and key stakeholders of the organizational changes and new NRC contacts. The transfers of RTRs and uranium recovery sites was completed in FY 2006 and the changes were presented at the TRTR Annual Meeting in September 2006.

The remaining work in FY 2007 is to continue implementing the expanded organization and managing the decommissioning of more sites.

Milestones and schedule:

Update Management Directives	06/07
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Assignments:

Hayes

6 Description of Other Program Management Improvements

6.1 Improvements related to the Program Evaluation and IG independent review

This activity is a continuation of one of the improvements the staff completed and that was tracked by the IG independent review. Although completed, the staff believes updating this activity is beneficial for the program.

6.1.1 Evaluate methods to measure decommissioning efficiency

Description:

This task continues the work started during FY 2005 to explore the feasibility of quantitative approaches for determining efficiencies within the decommissioning program. The task includes analysis of DP and LTP review time, Full Time Equivalent (FTE) expenditure for DP reviews, and quality of DPs and LTPs as

measured by the number and sets of Requests for Additional Information (RAIs). Results documented in the initial evaluation based on FY 2003-FY 2005 data will be updated with new data from FY 2006. This task will help address PART question 4.3: Does the program demonstrate improved efficiencies or cost effectiveness in achieving program goals each year?

Milestones and schedules:

Update evaluation with FY 2006 and FY 2007 data 12/07

Assignments: Orlando, Chang

6.2 Improvements related to the FY 2005 internal OMB PART review

6.2.1 Conduct formal OMB PART review

Description:

Prepare for and conduct the formal OMB PART review rescheduled for FY 2007. Preparations would include: FY 2007 work plan; review and revise FY 2006 answers based on new information about PART and the program; and collect and organize supporting evidence with ADAMS links.

Milestones and schedules:

Work plan	11/06 C
Review/revise FY 2006 answers	03/07 C
Complete draft submittal to OMB	03/07 C
Complete final submittal to OMB	04/07
Complete potential improvement plans	06/07
Revise IDIP based on results of PART review	11/07

Assignments:

SES manager/champion: Flanders

Johnson, Orlando, J. Davis

OCFO: Smolik, Coyle

6.2.2 Prepare new procedure for program performance measures

Description:

Prepare new procedure for performance measures that includes: 1) identifying the applicable performance measures for decommissioning and low level waste; 2) identifying organizational responsibilities for collecting and reporting data on the applicable measures; and 3) describing how to use NRC's NMED data base and other agency sources to collect and document program performance data that is provided to NMSS as input to the NRC's Performance and Accountability Report. A draft of the procedure was prepared in FY 2006 and the procedure will be completed in FY 2007.

Milestones and schedules:

Prepare final procedure 4/07

Assignments: Kennedy

6.2.3 Conduct independent reviews by ACNW

Description:

This improvement includes the ongoing independent reviews conducted periodically by ACNW members and ACNW working groups of decommissioning rulemaking, guidance development, lessons learned, and other selected key issues for the decommissioning program. ACNW working groups include decommissioning experts from industry and State regulators external to ACNW members and NRC.

Milestones and schedules:

ACNW review of lessons learned status 11/06 C

ACNW review of performance monitoring and legacy rulemaking 11/06 C

Assignments:

Rulemaking: Fredrichs, Shepherd

Lessons learned: Rodriquez

6.3 Other staff improvements

6.3.1 Comprehensive Decommissioning Program (CPD)

Description:

Currently, staff reports on complex materials sites for which it has jurisdiction in site summaries on its website, in the staff's annual decommissioning report and in an annual Commission paper that discusses sites that may have financial assurance problems. In order to present a national perspective of decommissioning of complex sites, staff will also include the same information in its reports listed above for sites for which Agreement States have jurisdiction.

Milestones and schedules:

OAS conference call	02/07 C
Develop actions and schedules	04/07
Develop list of information needed from Agreement States	05/07
Develop OMB clearance package	05/07
Present CPD at CRCPD meeting	05/07
Send Questionnaire to Agreement States	08/07

Assignment: Gnugnoli, Chang

6.3.2 Evaluate available stakeholder recommended improvements

Description:

The staff can obtain recommendations for improvements from a variety of sources, such as individual licensees, industry associations, public interest groups, members of the public, and the ACNW. The staff will review stakeholder recommended improvements received during FY 2006 and the first quarter of FY 2007 and determine which, if any, should be pursued. Example stakeholder recommendations include recommendations obtained at the ACNW meeting on decommissioning lessons learned in November 2007 and the Annual Decommissioning Briefing with the Commission in December 2007. Initially, develop a plan and schedule for the evaluation, including criteria for evaluating recommended improvements and regulatory products or actions to address the improvements

Milestones and Schedules:

Develop evaluation plan and schedule	07/07
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Assignments: Rodriguez

6.3.3 Conduct a stakeholder workshop on improvements to the regulations, guidance, and licensing process

Description:

Conduct a stakeholder workshop in FY 2009 to identify potential improvements to the regulations, guidance, and implementing licensing process (i.e., regulatory framework). The workshop should address: 1) emerging issues that are not addressed in the existing regulatory framework (gaps); 2) effectiveness of the regulatory framework including implementation of the LTR Analysis issue resolutions for institutional controls and realistic scenarios; and 3) improvements to the efficiency of existing regulatory framework. Based on stakeholder feedback at the workshop, the staff should schedule further assessment, as needed.

Milestones and Schedules:

Conduct a stakeholder workshop FY 2009

Assignments: Rodriguez

6.3.4 Conduct a program evaluation of decommissioning dose modeling

Description:

Conduct a program evaluation of DWMEP dose modeling approaches, methodologies, and tools used for decommissioning. This activity will focus on assessment of codes/models used, input parameters, as well as scenarios to demonstrate compliance with NRC's decommissioning dose criteria. This evaluation is intended for improvement in efficiency, approaches, and methodology, as well as use of lessons learned.

Milestones and schedules:

Complete evaluation 09/07

Assignments: Abu-Eid

6.3.5 Develop web-based dose modeling training

Description:

Currently, project managers take a dose modeling class when offered. To make the class more readily available, staff will develop a web-based dose modeling class.

Milestone and schedule:

Develop web-based dose modeling training 04/07

Assignment: C. Barr

Attachment 1

PROCEDURE DWMEP 2.1 PROGRAM IMPROVEMENT PLANNING AND DEVELOPMENT (Taken from the DWMEP Operations Manual)

PURPOSE

The purpose of this section is to describe the general process for “continuous improvement” of the Decommissioning Program. This process includes four steps to assess and improve and reassess the Decommissioning Program. It applies to the Comprehensive Decommissioning Program as defined in NRC Budget Request and, therefore, it includes activities of many NRC organizations including: NMSS/DWMEP/DCD; NMSS/DWMEP/EPAD; Regions; and Office of Nuclear Regulatory Research (RES).

PROCEDURES

2.1.1 Integrated Improvement Planning and Assessment Process

The Integrated Decommissioning Improvement Plan (IDIP) continuous improvement process consists of a repeating a cycle of four steps:

- Assess program
- Plan improvements
- Conduct improvements
- Measure and reassess program

2.1.1.1 Program Assessment

The following types of program assessments or reviews should be conducted as appropriate. Methods are described below for both self assessments and independent assessments. Frequency and scheduling of assessments should be done each year in the annual update to the IDIP and the Operating Plan.

Staff Self Assessments

Staff self assessments can be either self initiated or Agency required (e.g., FY 2003 Program Evaluation of Changes to the Decommissioning Program required by the Government Performance Results Act (GPRA)). However, the assessment is conducted by the staff. The scope can be either broad and cover the total program, a focused “vertical slice” of part of the program or an important issue, or the implementation of the regulations (e.g., License Termination Rule (LTR) Analysis of implementation issues).

The results of self assessments should be documented in a report that is publically available. The assessment report should include findings and recommendations. The recommendations will be considered each year when the IDIP is updated.

Staff Assessments of Stakeholder Views

Periodically, the staff conducts a Decommissioning Workshop for licensees and other stakeholders. During these workshops, the staff should invite stakeholder comments and suggestions regarding program effectiveness and ways to improve the program. The staff should evaluate the stakeholder comments and recommend program improvements that will be considered along with other recommended program improvements when the staff updates its IDIP each year.

Advisory Committee on Nuclear Waste (ACNW) Independent Technical Reviews

The ACNW is an independent advisory committee to the Commission. Periodically, ACNW conducts reviews during the year on a variety of topics related to the staff's ongoing decommissioning work. These reviews are more technical and usually focus on regulatory products under development (rulemakings, guidance, policy issues) or technical issues being addressed by the staff as it implements the program (e.g., institutional controls, intentional mixing of soils). These technical reviews can be requested by the staff, initiated by the ACNW, or requested by the Commission.

The ACNW reviews are documented in official transcripts of ACNW meetings and letters to the Commission. The staff's responds to the ACNW letters and includes actions, as appropriate. Most of the recommendations are relevant to specific regulatory products and would be considered in developing specific regulatory products. However, some comments or recommendations may have broader applicability to Decommissioning Program and could be considered in planning program improvements.

Typically, many ACNW reviews are conducted each year on a schedule developed and updated periodically during the year to support the staff's products.

Commission Annual Program Reviews

Annually, the staff provides the Commission with an annual report of the Decommissioning Program and a Commission briefing. Through this regular and formal process, the Commission provides oversight of the effectiveness and issues of importance to the Decommissioning Program. These annual reviews are open to the public and include participation by selected stakeholders to provide their independent views to the Commission.

In response to these annual program reviews, the Commission provides direction, as appropriate, to the staff for improvements to the program.

NRC Inspector General Independent Program Reviews

The Inspector General (IG) can schedule a program reviews as was done for the Decommissioning Program during FY 2005 to help prepare for the FY 2006 OMB PART review. The IG is considered independent by OMB. These reviews would be documented in an IG Report. The staff would prepare a response to the IG recommendations and determine if improvements are needed and include them in the annual update to the IDIP.

OMB Program Assessment Rating Tool (PART) Reviews

OMB has been implementing the PART for all Federal programs. An OMB PART is currently scheduled for the Decommissioning Program in FY 2006. Essentially, the PART review has two steps: 1) NRC provides OMB with answers to 39 questions and 2) OMB reviews NRC's answers and prepares the OMB answers to the 39 questions, scores the overall program, and requests NRC to make specific improvements.

2.1.1.2 Plan improvements

The staff will update the IDIP each year and include plans for new improvements directed by OMB or the Commission and new improvements recommended by other assessments and approved by NRC management.

2.1.1.3 Conduct improvements

Improvements planned in IDIP will be conducted as scheduled (e.g., develop new or revised guidance or develop a work prioritization process).

When completed improvements will be implemented by the program through the appropriate mechanism (e.g., guidance, Operations Manual, Op Plan)

2.1.1.4 Measure and reassess program

Periodically reassess the program on a schedule established by the Agency, such as for the OMB PART, or on a schedule that would result in a meaningful assessment considering many improvements need time to implement before their resulting efficiencies can be measured or reassessed.

Periodically reassess the regulatory framework for Decommissioning (rules, guidance, procedures) to ensure consistency and implementability (e.g., LTR Analysis of implementation issues).

Periodically "measure" the efficiencies gained by the program improvements.