
NRC/Westinghouse Management Meeting Hematite Decommissioning Project

June 19, 2007

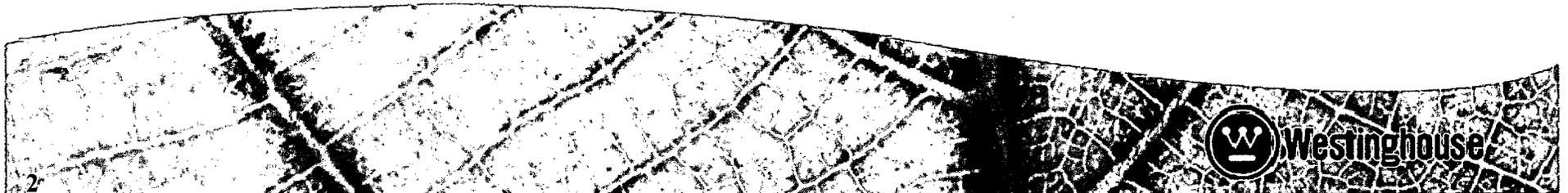
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Hematite Licensing

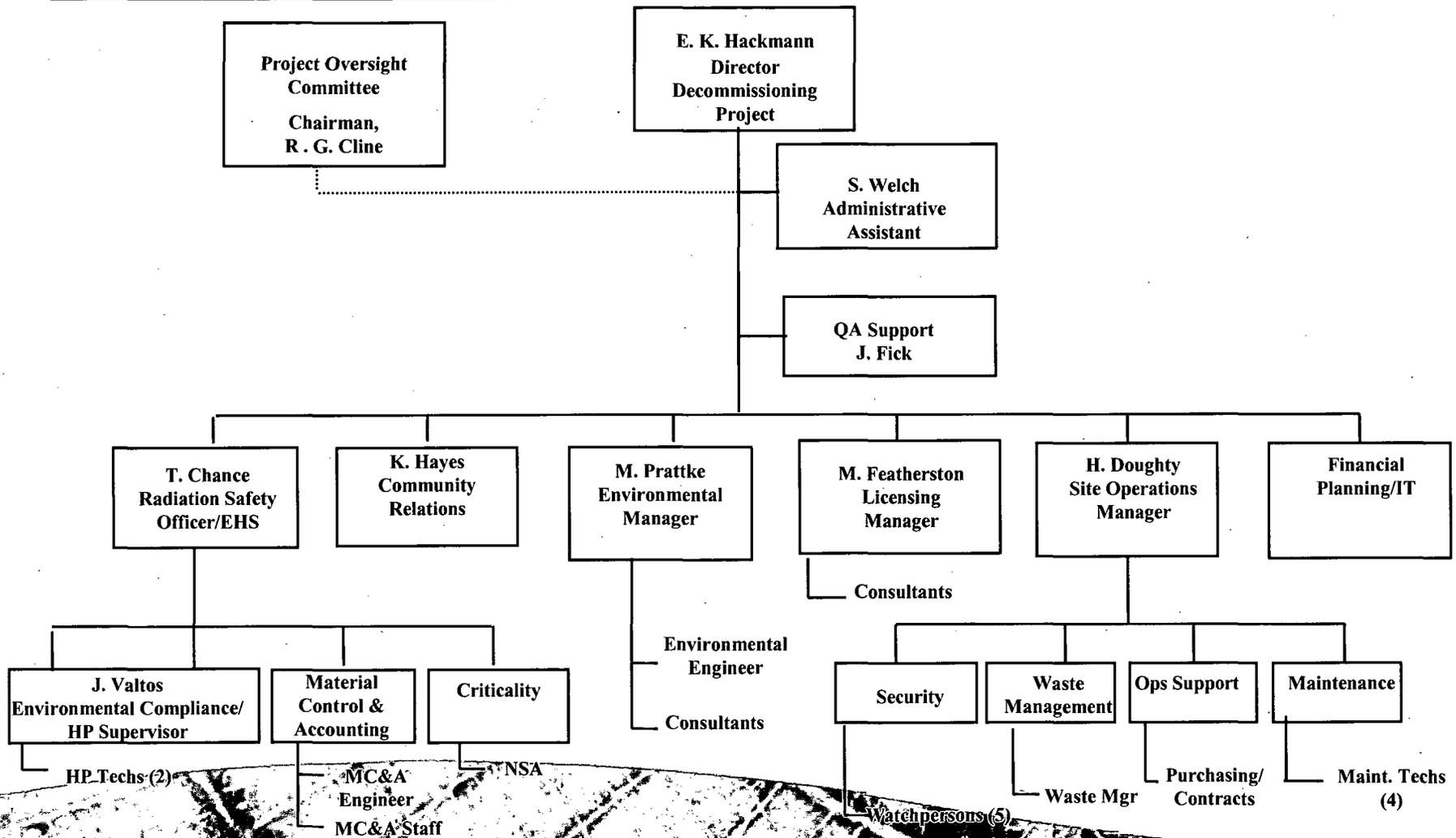


PRESENTATION SUMMARY

- **Project Update** (Slides 3 – 4)
- **Historical Licensing Strategy** (Slides 5 – 7)
- **Current Licensing Strategy** (Slides 8 – 9)
- **Scope of Licensing Basis Changes** (Slides 10 – 15)
- **Licensing Submittal** (Slides 16 – 18)
- **Schedule for Submittal** (Slide 19)
- **Potential Issues** (Slide 20)
- **Questions/Answers** (Slide 21)



PROJECT UPDATE – HEMATITE ORGANIZATION



PROJECT UPDATE – CURRENT LICENSING APPROACH

- **Licensing strategy to implement regulatory requirements appropriate to Hematite, with margins of safety and flexibility**
 - **Review previously submitted documents to ensure consistency with licensing strategy**
 - **Review previous NRC correspondence, RAIs, etc., to ensure licensing basis is responsive**
 - **Ensure changes in documents are clearly indicated, and adequate justification is provided for the changes**
- **Regular communications with NRC Project Team**



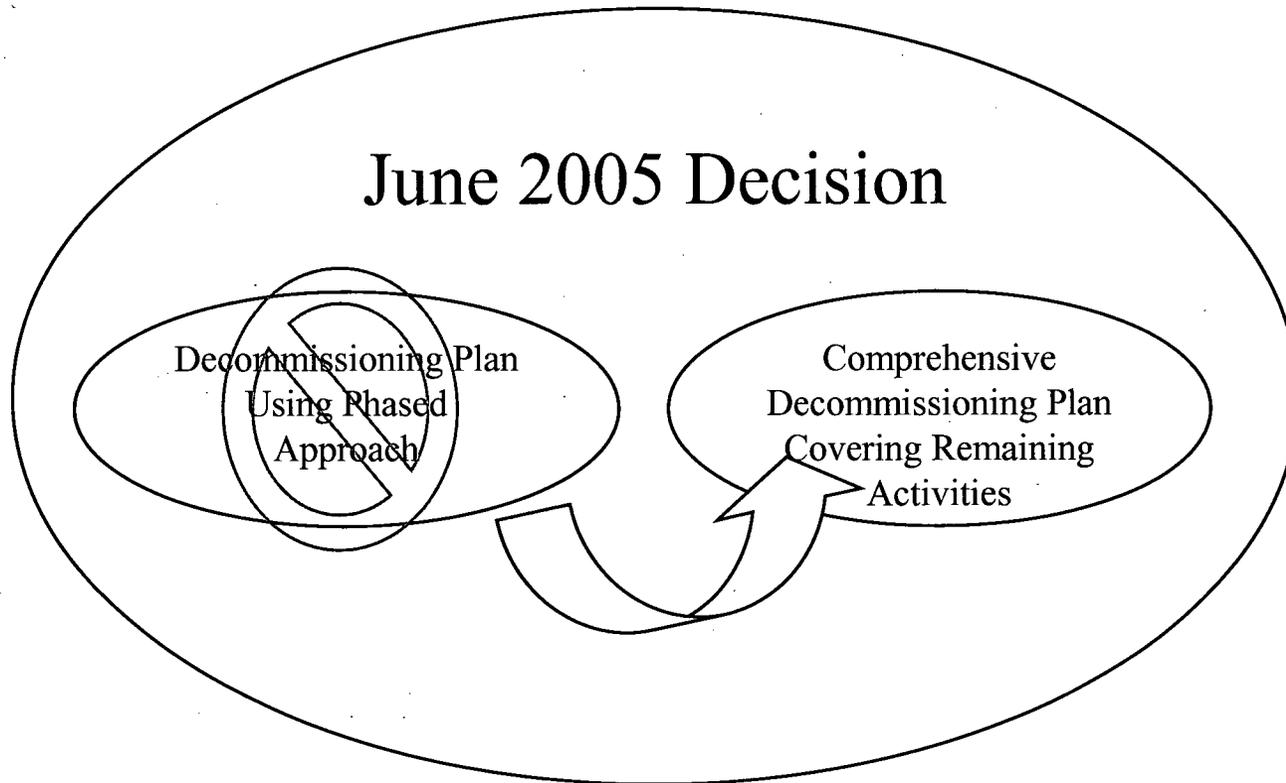
HISTORICAL LICENSING STRATEGY

- **2001 – Permanent Cessation of Fuel Processing Operations**
- **2001 – 2005 - Decommissioning Activities via:**
 - **License Amendment**
 - **Decommissioning Plan for individual phases**

*Early Decommissioning Based on “Phased”
Approach*



HISTORICAL LICENSING STRATEGY



*Decommissioning Shift from "Phased" to
"Comprehensive" Approach*

HISTORICAL LICENSING STRATEGY

- **Decommissioning Plan, Rev. 2 – Late-2005**
- **NRC Requests for Additional Detail**
 - January 25, 2006, Meeting Comments re Decomm. Plan
 - RAI re Buried Waste Characterization Plan (BWCP)
- **Decommissioning Plan, Rev. 3 – June 19, 2006**
 - Accepted for Technical Review - Sept. 20, 2006
 - Acceptance specified need for: (1) updates of other licensing basis documents; and (2) response to BWCP RAI
- **License Amendment Request – February 5, 2007**

*Significant Licensing Actions/Events To-Date to
Implement “Comprehensive” Approach*



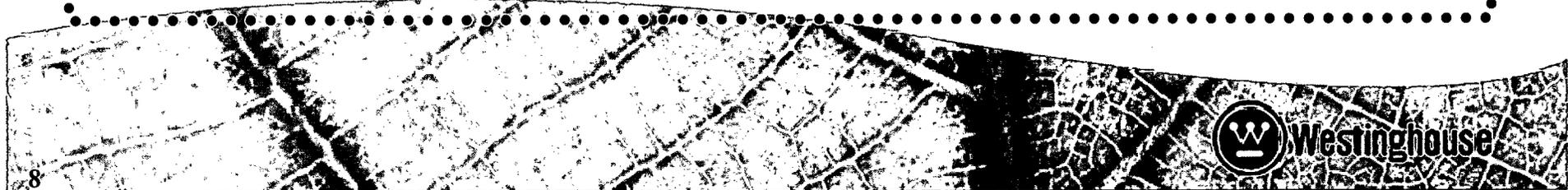
CURRENT LICENSING STRATEGY

Primary Issue: Complexity of Site Decommissioning Leads to Evolving Approach

Strategic Approach:

- **Considers Impact of Remaining Activities On Entire Licensing Basis**
- **Addresses NRC Requests for Additional Detail**
- **Ensures License and Implementing Programs are Consistent and Integrated**

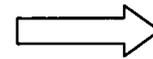
Emphasis on Quality of Submittals, Licensing Documents, Commitment Tracking, and Program Implementation



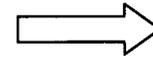
CURRENT LICENSING STRATEGY

Licensing Basis Expanding to Include:

- Soil Remediation
- Final Status Surveys
- Subsurface Disturbance, including Burial Pit Remediation
- On-Site Waste Treatment



NRC RAI dated
August 24, 2006



NRC Comments from January 2006
meeting



**Comprehensive
Decommissioning
Plan, License, and
Associated
Licensing Basis
Documents/
Programs
to Cover
Remaining
Decommissioning
Activities**

Comprehensive and Integrated Licensing Basis



SCOPE OF LICENSING BASIS CHANGES

Two Significant Changes to Hematite License

- **Changes to License Material Possession Limits – Category II Quantity** (Slides 11 – 12)
- **Special Authorization and Specific Exemption for “Unanticipated Condition”** (Slide 13)



SCOPE OF LICENSING BASIS CHANGES

Changes to License Material Possession Limits

Proposed limits established at a level to:

- Provide sufficient margin to adequately bound the quantities and forms of SNM that have a credible and reasonable likelihood of being accumulated
- Not require implementation of costly regulatory requirements that would have no significant offsetting safety/security benefits

Significant Margin “Built In” to Proposed Limits

SCOPE OF LICENSING BASIS CHANGES

Changes to License Material Possession Limits

Burial Pit remediation performed in controlled manner:

- **Implement aggressive shipping schedule with goal to maintain total material on site at Category III quantities**
- **Perform radiological field scans and assays to ensure total material is maintained less than license limits**

Significant Margin “Built In” to Proposed Limits

SCOPE OF LICENSING BASIS CHANGES

Special Authorization and Specific Exemption

Special authorization and associated regulatory exemptions for the unlikely (hypothetical) scenario in which undocumented SNM is discovered and removed from in-situ locations during buried waste remediation in an amount that would result in an unanticipated accumulation of an amount greater than license limits

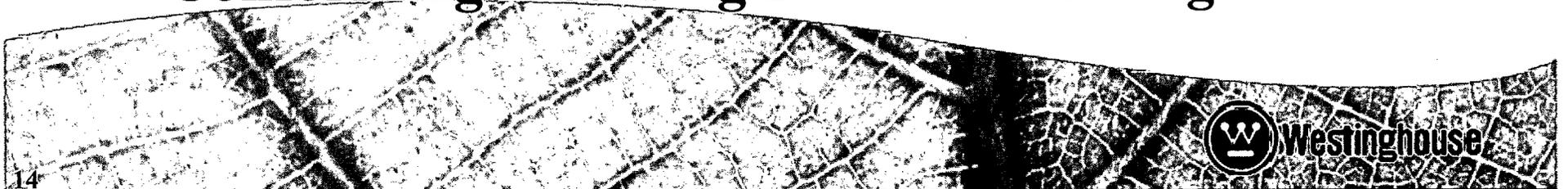
*No Reasonable Expectation That This Allowance Would
Ever be Needed*



SCOPE OF LICENSING BASIS CHANGES

Impacts on Licensing Basis and Program Documents

- **Physical Security Plan**
 - Category II Plan
 - Graduated Approach
 - Supplemental Plan for Unanticipated Condition
- **Fundamental Nuclear Material Control Program**
 - Category II Plan
 - Supplemental Plan for Unanticipated Condition
- **Conforming Licensing Document Changes**



SCOPE OF LICENSING BASIS CHANGES

Other Impacts on Licensing Basis

- **Changes to provide additional detail, including:**
 - **Response to NRC RAI dated August 24, 2006; and**
 - **Response to the January 25, 2006, meeting comments;**
- **Incorporation of additional site characterization data;**
- **Updating decommissioning cost estimate;**
- **Option to retain certain non-process buildings;**
- **General updates to reflect current status; and**
- **Further development of the Hematite Final Survey Plan.**



LICENSING SUBMITTAL

License Amendment Request

- **Chapters 1, 4, and 7**
- **Fundamental Nuclear Material Control Program (Category II)**
- **Physical Security Plan (Category II, graduated approach)**
- **Supplemental Security Plan (SGI Controlled)**
- **Request for Specific Exemption from 10 CFR Parts Applicable to Formula Quantity Licensees**



LICENSING SUBMITTAL

Decommissioning Plan

- **Revised Decommissioning Plan**
- **RAI Responses**
- **Responses to Meeting Comments**

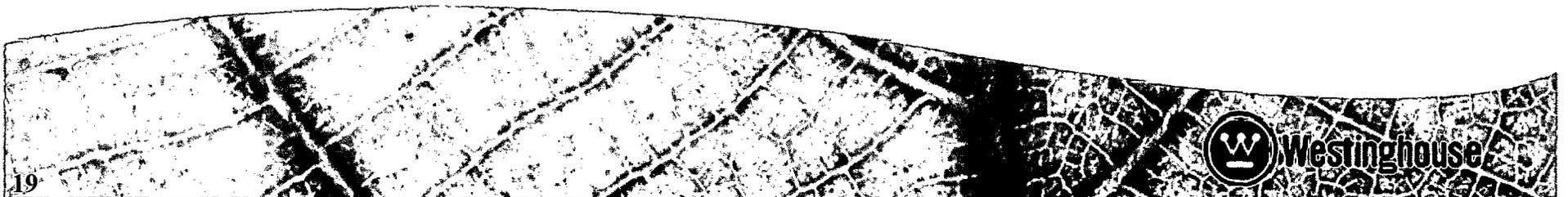
LICENSING SUBMITTAL

Decommissioning Plan Supporting Documents

- **Final Survey Plan**
- **Environmental Report**
- **Surrogate Radionuclides Report**
- **Groundwater DCGL Report**
- **Site Characterization Report**
- **Cost Estimate and Funding Plan**
- **Environmental Monitoring Plan**

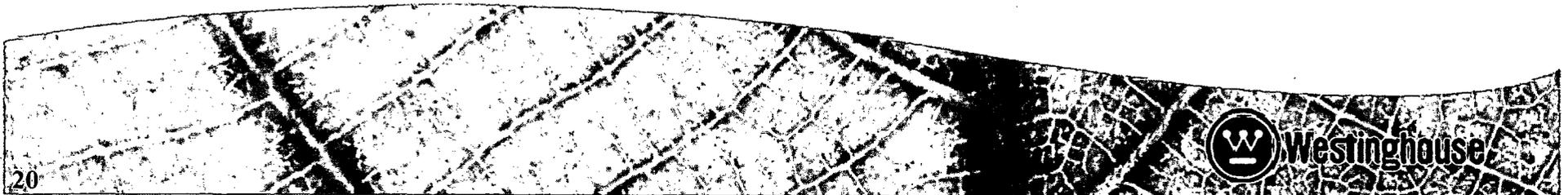
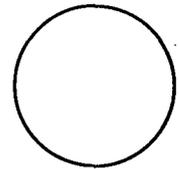
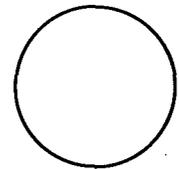
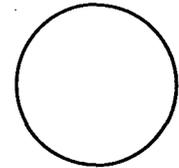
SCHEDULE FOR SUBMITTAL

- **Goal to Submit Decommissioning Plan and Other Affected Licensing Basis Documents by Late-Summer 2007**
- **Hematite Management Will Continue to Provide Schedule Updates**



POTENTIAL ISSUES

- **Stability of Westinghouse and NRC Project Team Members**
- **Change in Required Level of Detail for Remediation Operations Needed for Decommissioning Plan Approval**
- **Site Remobilization/Restart Date**



QUESTIONS/ANSWERS

