TECHNICAL EVALUATION REPORT
FOR MODIFYING THE FREQUENCY OF THE CALIBRATIONS OF INSTRUMENTS USED IN RADIOLOGICAL MONITORING AT THE HIGHLAND RECLAMATION PROJECT

FACILITY:	Highland Reclamation Project
LICENSEE:	ExxonMobil Refining and Supply Company
DOCKET NO.:	40-8102
LICENSE NO.:	SUA-1139
PROJECT MANAGER:	Tom McLaughlin
TECHNICAL REVIEWER:	James Webb

INTRODUCTION:

By letter dated June 25, 2007, ExxonMobil Refining and Supply Company (ExxonMobil) requested that the U.S. Nuclear Regulatory Commission (NRC) staff amend Source Materials License SUA-1139 for the Highland Reclamation Project (Highland), to change the frequency of the calibrations of instruments used in radiological monitoring. License Condition No. 22 of ExxonMobil's license specifies that the calibration of instruments used in radiological monitoring shall be performed and reported on a semiannual basis. However, the American National Standards Institute (ANSI) N323A, published in 1997, has established an annual calibration frequency for radiation monitoring instruments.

ANSI is a private, non-profit organization that oversees the development of standards for products, services, processes, systems, and personnel in the United States. ANSI accredits standards that are developed by representatives of government agencies, consumer groups, companies, and others. These standards ensure that the characteristics and performance of products are consistent, that people use the same definitions and terms, and that products are tested the same way.

In light of the ANSI standard for the calibration frequency, ExxonMobil has requested that Source Materials License SUA-1139 be amended to reflect the currently accepted annual calibration frequency for radiation monitoring instruments.

TECHNICAL EVALUATION:

This technical evaluation report evaluates the acceptability of the ExxonMobil requested license amendment. In this regard, ExxonMobil has requested that the NRC amend License Condition No. 22 of Source Materials License SUA-1139 to change both the calibration and reporting frequencies from a semiannual basis to an annual basis. The ANSI standard for calibrating radiation monitoring instruments on an annual basis has been in place for more than 10 years. Calibrating radiation monitoring instruments on a semiannual basis is conservative and not necessary.

CONCLUSIONS:

Based on the foregoing evaluation, the NRC staff agrees with the ANSI established annual frequency for the calibration of radiation monitoring instruments and agrees with the suggested change to License Condition No. 22.

RECOMMENDED LICENSE CHANGES:

License Condition No. 22 is changed to read as follows:

22. Groundwater monitoring required by this license shall be conducted in accordance with the quality assurance program specified in Chapter 4 of ExxonMobil's Highland Mine Site Procedures Manual as updated. Calibration of instruments used in radiological monitoring shall be performed on an annual basis. The monitoring results shall be reported annually to the Deputy Director, Decommissioning and Uranium Recovery Licensing Directorate, Division of Waste Management and Environmental Protection, Office of Federal and State Materials and Environmental Management Programs, Washington, DC 20555, Mail Stop T-8F5, or by express delivery to 11545 Rockville Pike, Rockville, Maryland 20852-2738, in accordance with the requirements of 10 CFR 40.65.

REFERENCES:

The following reference is available for inspection at NRC's Public Electronic Reading Room at http://www.nrc.gov/reading-rm/adams.html.

Letter dated June 25, 2007, from Mahesh Vidyasagar, Tetra Tech, contractor for Dan Burnham, ExxonMobil, to Tom McLaughlin, NRC, requesting amendment to License Condition No. 22 of Source Materials License SUA-1139 for the Highland Reclamation Project (ADAMS Accession No. ML071840649).