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March 22, 2005

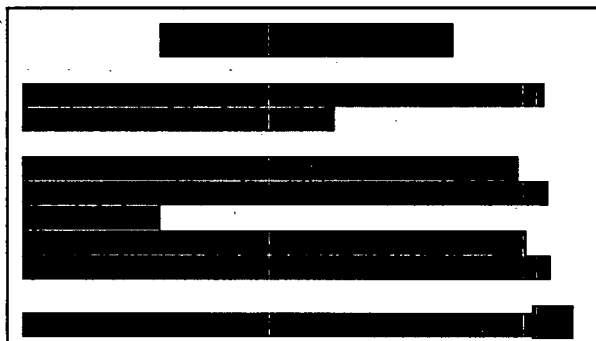
Ms. B. Marie Moore, Vice President
Safety and Regulatory
Nuclear Fuel Services, Inc.
P.O. Box 337, MS 123
Erwin, TN 37650

SUBJECT: NUCLEAR FUEL SERVICES, INC., REQUEST FOR ADDITIONAL
INFORMATION CONCERNING ALTERNATE METHODS FOR FINAL STATUS
SURVEY OF RELOCATED BANNER SPRING BRANCH (TAC L31863)

Dear Ms. Moore:

This refers to your letter dated November 23, 2004 (NFS no. 21G-04-0170), concerning your plans to use methods in Appendix A to Chapter 5 of the North Site Decommissioning Plan to conduct the final status survey supporting relocation of the Banner Spring Branch. Our review of your application has identified that additional information is needed before your request can be approved. The additional information, specified in the enclosure, should be provided within 30 days of the date of this letter. Please reference the above TAC No. in future correspondence related to this request.

If you have any questions concerning this letter, please contact me at (301) 415-7887 or via e-mail to kmr@nrc.gov.



[REDACTED]

[REDACTED]

B. M. Moore

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[REDACTED]

Sincerely,

/RA/

Kevin Ramsey, Project Manager
Fuel Cycle Facilities Branch
Division of Fuel Cycle Safety
and Safeguards
Office of Nuclear Material Safety
and Safeguards

Docket No.: 70-143
License No.: SNM-124

Enclosure: Request for Additional Information

[REDACTED]

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B. M. Moore

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[REDACTED]

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Enclosure: Request for Additional Information

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OFC	FCFB		FCFB		DWMEP		FCFB	
NAME	K. Ramsey		B. Garrett		K. Gruss		M. Markley	
DATE	03/16/05		03/16/05		03/20/05		03/22/05	

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Request for Additional Information Concerning
the Alternate Use of Appendix A Methods for
Conducting the Final Status Survey to Support
Relocation of Banner Spring Branch
Dated November 23, 2004

Your submittal states that NFS plans to use methods contained in Appendix A to Chapter 5 of the North Site Decommissioning Plan. Appendix A refers to Section 5.7.2 of the plan for the comparison of soil survey results to release criteria. It states that the survey unit will be considered suitable for unrestricted release if any one of the following are demonstrated (emphasis added):

1. If the difference between the highest sum of fractions (SOF) value of the survey unit and the lowest SOF value for the reference unit measurement is less than one,
2. If the difference between the average SOF value for the survey unit and the average SOF value for the reference area is less than one,
3. If the survey unit passes the Wilcoxon Rank Sum test.

However, the guidance in Section 8.2 of NUREG-1575, "Multi-Agency Radiation Survey and Site Investigation Manual," states that it is possible for an unacceptable survey unit to pass the test in item 2 above (such as when the data have a skewed distribution). NUREG-1575 suggests performing a Wilcoxon Rank Sum Test in addition to the test in item 2 to verify that the survey unit is acceptable for unrestricted release. Please explain how NFS will verify that survey units meeting the test in item 2 are acceptable for unrestricted release.

This information is necessary to determine compliance with 10 CFR Part 20, Subpart E, Radiological Criteria for License Termination.

Enclosure

[REDACTED]