

## MFFFNPEm Resource

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**From:** David Tiktinsky  
**Sent:** Friday, January 23, 2009 11:10 AM  
**To:** 'dwgwyn@moxproject.com'  
**Cc:** Margie Kotzalas; Kevin Morrissey; MFFFHearingFile Resource  
**Subject:** FW: MFFF RAIs re the License Application Section 10  
**Attachments:** Mixed Oxide Fuel Fabrication Facility RAIs 1-22-09.doc

[revised draft enviromental RAIs](#)

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**From:** Stan Echols  
**Sent:** Wednesday, January 21, 2009 4:23 PM  
**To:** David Tiktinsky  
**Subject:** MFFF RAIs re the License Application Section 10

See attached

**Hearing Identifier:** MixedOxideFuelFabricationFacility\_NonPublic  
**Email Number:** 1245

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**Subject:** FW: MFFF RAIs re the License Application Section 10  
**Sent Date:** 1/23/2009 11:09:50 AM  
**Received Date:** 1/23/2009 11:09:51 AM  
**From:** David Tiktinsky

**Created By:** David.Tiktinsky@nrc.gov

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"Margie Kotzalas" <Margie.Kotzalas@nrc.gov>

Tracking Status: None

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Tracking Status: None

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**Recipients Received:**

## Mixed Oxide Fuel Fabrication Facility (MFFF)

### License Application RAIs – Section 10 (Environmental Protection)

The following requests for additional information (RAIs) relate to regulatory requirements for radiation protection of the public as found in 10 CFR Part 20, Subparts B (Radiation Protection Programs), D (Radiation dose Limits for Individual Members of the Public), F (Surveys and Monitoring), and L (Records):

LA-1: In section 10 (Environmental Protection), section 10.1.3 states that if an adverse trend in public doses is noted, an evaluation is made to determine if a detrimental effect is evident in the environment or surrounding area. The evaluation considers the information provided by the [SRS] environmental surveillance network.

- Describe (document) how you conducted (or will conduct) the assessment of the suitability of the SRS monitoring program for use by the MFFF, including criteria (e.g., Regulatory Guides) used (or to be used) in the assessment. Also, describe the Quality Assurance program used by SRS in developing and operating its monitoring program. Describe (document) your assessment of the adequacy of the SRS QA program for use by MFFF. Identify (document) any changes to the SRS monitoring or QA programs required by MFFF to meet applicable standards or criteria.
- Describe how SRS and MFFF data would be distinguished and parsed to allow an analysis of trending or other detrimental effects solely attributed to the MFFF.

LA-2: Various subsections of section 10 indicate that the MFFF uses the SRS monitoring program and its data.

- Describe your access to the data-whether you have direct access to various monitoring stations and instrumentation, receive periodic published reports, or otherwise. Identify the procedure for SRS communicating to MFFF any monitoring program changes that might be initiated by SRS, and how MFFF would incorporate any of its proposed changes into the SRS monitoring program.

LA-3: Section 10.1.3 states that based on the facility operating history and the data obtained from the environmental surveillances during operations, the sampling and/or analysis programs would be adjusted to optimize reliability.

- Clarify whether the sampling and analysis programs refer to the SRS environmental monitoring program or to the MFFF onsite sampling of its own facilities.

LA-4: Section 10.2.3 appears to be a restatement of section 10.1.3.

- If an NRC staff review of the MFFF semiannual effluent monitoring report resulted in a staff recommendation for enhanced monitoring, such as increased frequency of data collection or added sampling locations, describe (document) the procedure for modifying the SRS monitoring program to accommodate a staff recommendation.

LA-5: Section 10.3.7 indicates that analytical quality control is described in laboratory procedures and is consistent with the MOX Project Quality Assurance Plan.

- Provide a copy of the referenced laboratory procedures and a copy of any documentation that compares the two quality assurance plans.

LA-6: In sections 10.1 and 10.2 of the LA, environmental surveillance and monitoring is described as including existing programs from the Savannah River Site (SRS).

- Describe how the adequacy of the SRS program was evaluated and determined to be adequate for the MFFF. Also, describe how the SRS surveillance data are reviewed, if at all, other than by reviewing periodic SRS reports furnished by DOE

LA-7: In section 10.1.3 of the LA, reference is made to “many other system design features perform contamination control, confinement, and associated waste minimization functions.”

- Please cross-reference or identify those design features.

LA-8: In section 10.2.1.2 of the LA, reference is made that analytical quality control methodology is described in the appropriate laboratory manual.

- Please identify the manual.

LA-9: In section 10.2.3 of the LA, reference is made to data from the sampling and monitoring being reviewed on a regular basis.

- Are the data provided by SRS reports to the MFFF, or independent data generated by MFFF? Does the MFFF have access to SRS data in real time, rather than waiting for periodic reports? What is the basis for a cause of action caused by trending activity (slope, frequency, dose, other)?

LA-10: In section 10.3.4 of the LA, reference is made to operational monitoring and the potential for reduced frequency of monitoring.

- Will you seek prior NRC approval or provide prior notification before such action? What would the role of the SRS be, if any, regarding modifying operational monitoring of the MFFF? What, if any, monitoring or reporting is provided in the case of an accidental release to the public?