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Our ref: HEM-11-2
Date: January 19, 2011

Subject: Response to Request for Additional Information on Decommissioning Plan
Chapter 13 (License No. SNM-00033, Docket No. 070-00036)

Reference: 1) Nuclear Regulatory Commission (NRC - J. J. Hayes) letter to Westinghouse
(E. K. Hackmann), dated December 13, 2010, "Westinghouse Hematite
Decommission Plan Review Requests for Additional Information for
Decommissioning Plan Chapter 13"

Reference 1 issued the NRC's Request for Additional Information (RAI) concerning the
Hematite Decommissioning Plan (DP) Chapter 13. The Westinghouse response to that RAI is
submitted herein.

Attachment 1 provides the response to the Reference 1 RAI, including an explanation of
anticipated changes to the DP. The actual changes to the DP will be provided under separate
cover.

Please contact Mark Michelsen, Acting Licensing Manager of my staff at 314-810-3376 should
you have questions or need any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Kurt Hackmann", with a long horizontal flourish extending to the right.

E. Kurt Hackmann
Director, Hematite Decommissioning Project

Attachment: 1) Response to Request for Additional Information on Decommissioning Plan
Chapter 13

cc: J. J. Hayes, NRC/FSME/DWMEP/DURLD
J. W. Smetanka, Westinghouse, w/o attachment
J. E. Tapp, NRC Region III/DNMS/MCID, w/o attachment

ATTACHMENT 1

Response to Request for Additional Information on Decommissioning Plan Chapter 13

**Westinghouse Electric Company LLC,
Hematite Decommissioning Project**

Docket No. 070-00036

Responses to Requests for Additional Information on Decommissioning Plan Chapter 13

NRC issued a request for additional information (RAI) concerning the Hematite Decommissioning Plan (DP) in letter dated December 13, 2010. Westinghouse Electric Company LLC (Westinghouse) provides the response to that RAI herein.

The RAI response is annotated in the same manner as the RAI of NRC letter dated December 13, 2010. The NRC's Comment, Basis and Path Forward is reiterated, followed by the Westinghouse Response.

Hematite Decommissioning Plan Chapter 13 – Quality Assurance

(HDP-13-Q01) Comment: The offsite analysis of sampled material resulting in quality validated data is a critical component for the final status survey. Hematite Decommissioning Plan (DP) Section 14.2.3 Laboratory Instrument Methods and Sensitivities states "Laboratories chosen for analyses were authorized in accordance with Quality Assurance." In the context of Westinghouse's graded approach to Quality Assurance (QA), the statement is unclear as to what the primary QA elements/requirements are for the laboratories and how the laboratory requirements flow from the Hematite's QA requirements. The U.S. Nuclear Regulatory Commission (NRC) would expect Hematite contracted laboratories to have a QA/QC program that is verifiable with Westinghouse performing inspection/audits of the laboratory by qualified QA personnel. The NRC would also expect for contracted laboratories to have a requirement for laboratory certifications so that laboratory results will be accepted at State licensed disposal facilities.

Basis: Section D.2.3 of Appendix D of NUREG-1757, Vol. 2, The Assessment Phase, indicates that in focusing on data verification, an examination would be performed of the laboratory's standard operating procedures. The process would also involve checking for consistency and comparability of data, correctness of the data calculations and completeness of the results and data documentation. Such steps would ensure that the laboratory conditions and operations are in compliance with the statement of work and the project's quality assurance plan.

Path Forward: Provide additional information and/or clarification on the QA requirements for contracted laboratories and how these requirements flow from Hematite's QA requirements.

Westinghouse Response

Summary:

HDP requires contract analytical laboratories to 1) perform analysis consistent with established industry standard analytical methods (e.g., ASTM Standards, Environmental Monitoring Laboratory (EML) Procedures Manual); 2) participate in inter-laboratory cross comparison programs (e.g., Mixed Analyte Performance Evaluation Program (MAPEP)); 3) maintain pertinent laboratory accreditations (e.g., National Environmental Laboratory Accreditation Program (NELAP)); and 4) have an established Quality Control program.

QA requirements for contracted laboratory services are defined by Hematite quality assurance procedures, and the QA requirements that are specific to the scope of contracted laboratory services are communicated through Purchase Order Requirements including a Statement of Work (SOW). The SOW includes the laboratory scope, analytical parameters and the analytical methods to be used in accordance with the contracted laboratory's standard operating procedures (SOPs). The SOPs incorporate the requirements needed to meet applicable industry standards such as MARSSIM for final status survey, and the National Voluntary Laboratory Accreditation Program (NVLAP) for dosimetry. For non-radiological parameters, the analytical work will be conducted in accordance with protocols such as US EPA Contract Laboratory Program (CLP) and/or SW-946 methods.

In consideration of these requirements, contracted laboratory programs are evaluated by Westinghouse Qualified Lead Auditors with the assistance of Technical Specialists through initial and periodic inspections/audits during the performance period of the contract.

Discussion:

The HDP quality assurance program addresses the requirements of Section 14.2.3 of the Decommissioning Plan (DP). The HDP QA graded approach provides a means of applying, in sufficient depth, the requirements appropriate to the item or activity. HDP QA procedures implement the HDP quality assurance program requirements by providing details regarding the QA graded approach, including its purpose, logic, description and application. Graded approach procedures also apply to quality-related items, projects and services as appropriate that have been determined to be Important to Safety (ITS).

Laboratories contracted to HDP are initially and periodically evaluated by Qualified Lead Auditors and Technical Specialists. The evaluations of laboratory QA/QC programs include: on-site audits for initial evaluation and on a triennial basis; as well as an annual Supplier Audit Evaluation to identify major changes to their quality program. Independent third party certifications of these laboratories, such as NELAP, NVLAP, and ISO 9001:2000 are also considered during their evaluation. Maintenance of applicable accreditations is imposed as a quality requirement on the purchase order.

During audits of contracted laboratories, the laboratory SOPs are reviewed from both a quality and technical viewpoint. This review includes an assessment of measures established and implemented to control the issuance of documents (procedures, instructions, drawings, work orders, etc.) including changes. Documents are reviewed to ensure adequacy, and that they are

approved for release by authorized personnel, distributed to applicable workstations, and adequately controlled if maintained electronically.

Westinghouse's current laboratory analysis vendor performs data review, verification, and reporting in accordance with approved SOPs. In accordance with these SOPs, analytical data is reviewed by the analyst performing the task, followed by a secondary review by a department supervisor/lead analyst or their designee, and tertiary review by the associated project manager. The QA department performs an independent random review as oversight of the process. This review is documented on a data review checklist specific to each analytical method.