

April 26, 2011

MEMORANDUM TO: Dennis C. Morey, Acting Chief  
Conversion, Deconversion, and  
Enrichment Branch  
Division of Fuel Cycle Safety  
and Safeguards  
Office of Nuclear Material Safety  
and Safeguards

FROM: Matthew A. Bartlett, Project Manager */RA/*  
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Enrichment Branch  
Division of Fuel Cycle Safety  
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Office of Nuclear Material Safety  
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SUBJECT: APRIL 14, 2011, CALL REGARDING REQUESTS FOR ADDITIONAL  
INFORMATION FOR FINANCIAL ASSURANCE AND HUMAN  
FACTORS TO SUPPORT THE INTERNATIONAL ISOTOPES, INC.,  
LICENSE APPLICATION SAFETY REVIEW (TAC NO. L32739)

The U.S. Nuclear Regulatory Commission's staff held a conference call with the International Isotopes, Inc.'s, (INIS) licensing manager and contractors on April 14, 2011. The purpose of the call was to discuss the draft responses to the Requests for Additional Information (RAI) for the financial assurance and human factors reviews. A summary of the call and the talking points provided in advance of the call are enclosed. INIS reviewed this summary for factual correctness.

CONTACT: Matthew A. Bartlett, NMSS/FCSS  
(301) 492-3119

Docket No. 40-9086

Enclosures:

1. Agenda and List of Participants
2. Call Summary for Draft RAI Responses  
for Financial Assurance and Human Factors
3. Financial Assurance and Human Factors Talking Points

cc: Mr. John J. Miller, CHP

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NAME	MGuardiola	MBartlett	LAllen	DMorey
DATE	4/19/11	4/21/11	4/23/11	4/ 26 /11

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**AGENDA AND LIST OF PARTICIPANTS FOR  
TELEPHONE CONFERENCE TO DISCUSS DRAFT  
REQUEST FOR ADDITIONAL INFORMATION RESPONSES  
APRIL 15, 2011**

**AGENDA**

8:30 AM - 9:15 AM Discussed Financial Assurance

9:15 AM - 10:00 AM Discussed Human Factors

**PARTICIPANTS**

**NAME**

**AFFILIATION**

Maria Guardiola  
Matthew Bartlett  
Roman Przygodzki  
Julie Marble

U.S. Nuclear Regulatory Commission (NRC)  
NRC  
NRC  
NRC

John Miller  
Jim Thomas  
et al.

International Isotopes, Inc., (INIS)  
INIS/Contractor  
INIS/Contractor

**CALL SUMMARY FOR  
DRAFT REQUEST FOR ADDITIONAL INFORMATION RESPONSES  
FOR FINANCIAL ASSURANCE AND HUMAN FACTORS**

**Financial Assurance**

The U.S. Nuclear Regulatory Commission's (NRC) staff requested clarification on the shipping costs of waste disposal for certain materials. In addition, NRC staff wanted International Isotopes, Inc., (INIS) to explain their 25 percent overhead for third-party labor. NRC staff requested INIS to clarify whether the costs of disposal and shipping of DUF<sub>6</sub>, DUF<sub>4</sub>, DUO<sub>2</sub>, and UO<sub>2</sub> are included in the estimate. INIS indicated that additional detail would be provided. The NRC's staff requested INIS to provide quoted rates for low-level radioactive waste packaging, transportation and disposal. Although a contract is not currently in place, INIS will provide additional basis for the waste disposal estimates in the application. INIS indicated they would not provide forward-looking financial information. However, they would support a license condition which would require a yearly update to the Decommissioning Funding Plan over the first few years of operations. The license condition could be removed after several years of operations through a license amendment.

**Human Factors**

NRC staff agreed with INIS's plan to provide a human factors (HF) implementation plan as stated in the draft responses to the request for additional information (RAI), but also requested the plan be incorporated into the license application. This plan would contain much of the information needed to address the RAIs. INIS questioned both the level of detail being requested by the RAIs and why there was a need to incorporate the implementation plan into the license application. The NRC project manager provided INIS an example of an HF implementation plan which had been incorporated into and approved for a previous license application (Agencywide Documents Access and Management System, Accession Number ML102080476). The HF reviewer cautioned that the example was developed before NUREG-1520, Revision 1 was implemented; and INIS's implementation plan should be consistent with the NUREG-1520, Revision 1, rather than the example. INIS reiterated that their application was submitted prior to publication of the updated NUREG-1520, Revision 1. INIS will make a good effort to address the questions.

The NRC staff emphasized that the RAI responses should focus on how the HF program will be developed. The RAI responses should describe the process for identifying and implementing HF, rather than providing specific details about facility systems. INIS believed the commitments to complying with the regulatory guidance demonstrate compliance with the regulations. The NRC staff indicated additional description of the program implementation is needed to address the RAIs.

INIS expressed concern that the level of detail requested in the RAIs would not be available till after the formal design is completed in late 2011. NRC staff understands that the design is not finalized; therefore, INIS does not need to provide details associated with the design. NRC staff indicated that INIS should describe the process they will use to meet the acceptance criteria in NUREG-1520, Revision 1, Appendix E.

INIS plans to provide the final RAI responses by the end of April 2011.

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