Enclosure 1 to HEM -12-2 – RAIs and Proposed Resolution
March 2012

RAI No.	Section	Issue	Regulatory Link	Discussion	Path Forward
1	Section 2	Criticality Safety Assessment & SNM at USEI	10CFR20.2002	It is unclear whether USEI has or expects to receive and dispose of other sources of SNM in their disposal cells.	Does USEI have SNM in their cell from any other sources? Is USEI aware of any other applications to dispose of SNM at USEI?
2	Section 2	Dose Assessment	10CFR51.31	Attachment 9 contains the work related injuries and illnesses at Hematite and USEI through the 2nd quarter of 2011.	Update Attachment 9 to include the information from the last 6 months of 2011.
3	Section 4	Performance Assessment & Waste Characterization	10CFR20.2002	Westinghouse made reference to the USEI web site for information on the USEI waste acceptance criteria. Westinghouse needs to provide the waste acceptance criteria upon which their submittal is based so that the staff is clear as to what criteria Westinghouse is intending to meet. These criteria could change from the time Enclosure 1 was generated and over the course of the staff's review. If the criteria changes, then the Westinghouse submittal may be revised.	Provide the current USEI waste acceptance criteria on which the Westinghouse submittal is based.
4	Section 5.1	Waste Characterization	10CFR20.2002	It is indicated that the average waste ρ was 1.5 g/cm^3 for the slabs and the soil under the slabs.	Provide the basis for determining that the average waste ρ was 1.5 g/cm^3 for the slabs and the soil under the slabs.

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5	Section 5.1	Criticality Safety Assessment, FNMCP & Physical Security	10CFR74.11	It is stated that the waste in the soil, slabs, concrete, asphalt, or HVAC equipment would consist of U-235 at enrichment levels averaging below 10%.	Provide the basis for concluding that there will be any U-235 in the soil, slabs, concrete, asphalt, or HVAC equipment enriched to levels above 5%.
6	Section 5.2	Characterization	10CFR20.1302 (a) and 10CFR20.1302 (b)	Section indicates that no additional characterization will be performed on asphalt/concrete or specific miscellaneous equipment. No basis is provided for excluding additional characterization of these items. Such characterization and its associated characterization data would be necessary to demonstrate that the dose consequences to the maximum exposed individual would only be a few mrem/yr for the asphalt/concret and specific miscellaneous equipment. No characterization can be performed on the water treatment equipment since it has not operated. Only a projection could be made based upon the material to be processed.	Provide the basis for not performing additional characterization on asphalt/concrete or specific miscellaneous equipment prior to shipment and the basis for concluding that the dose consequences to the maximum exposed individual is only a few mrem/yr. Provide an estimate of the anticipated concentratons of radioactive materials expected to be found on the waste water treatment facility's equipment

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7	Section 5.2.2	Characterization	Omission	The unnamed and unnumbered Table on the bottom of page 5 needs to be labeled. The table identified as Table 2 on page 10 needs to be designated as Table 3.	Add Table number and title to Table on page 5. With the addition, the reference to Table 2 in Section 6.1 should be changed to Table 3 and present Table 2 on page 10 changed to Table 3.
8	Section 6.2 – 6.7	USEI Worker Doses	10CFR20.2002	These sections describe the number of USEI workers who share in the responsibility for the various identified tasks. It is indicated that the dose is divided among the number of workers. Is the number of workers sharing in these tasks the minimum that have performed these functions or has there been circumstances such as layoffs, etc where the number of individuals performing these tasks is less than indicated in these sections?	Provide information as to whether the number of workers specified in the dose assessments of Sections 6.2 – 6.7 is the minimum maintained during USEI operation and that layoffs or other circumstances have not resulted in a decrease in the number performing the identified tasks.
9	Section 8	Criticality Safety	10CFR70.24	Westinghouse addresses the criticality safety issues associated with the disposition of Hematite material at the USEI site but does not address the potential criticality issues associated with the Hematite material interacting with other SNM buried in the USEI cell.	Provide an assessment which addresses the criticality safety aspects associated with the Hematite material potentially interacting with other SNM buried in the USEI cell.