

March 30, 2012

Mr. Kenneth Kalman Office of Nuclear Materials Safety & Safeguards U.S. Nuclear Regulatory Commission Washington, DC 20555

Re: Docket No. 70-925; License No. SNM-928 Annual Report of Changes to the Decommissioning Plan and Radiation Protection Program

Dear Mr. Kalman:

This letter provides an annual report of changes to the Cimarron Site Decommissioning Plan and Radiation Protection Plan (RPP) as required by License SNM-928, Condition 27(e)(3). This report covers the first full year of activity under the subject license since it was transferred to the Cimarron Environmental ResponseTrust (CERT) on February 14, 2011. Changes are as follows:

Decommissioning Plan: No revisions.

<u>Radiation Protection Plan</u>: The RPP was revised twice during the past year. The first revision was completed shortly after the license transfer, and is referred to as Revision 0 because it was the first version of the RPP which identifies CERT as the licensee. Revision 0 made no substantive changes to the previous licensee's RPP; it only made changes to the RPP needed to reflect transfer of the license to CERT, and to name CERT's Radiation Safety Officer (RSO) as required by License Condition 27(e)(3).

The second revision to the RPP, Revision 1, was completed on February 3, 2012. In this revision, some changes were made to the RPP to reflect the current status of decommissioning and upcoming groundwater remediation. The RPP was streamlined and to eliminate some radiation protection procedures deemed no longer applicable. Those procedures which were eliminated have been archived and can be reinstated if needed based on agency-approved planned groundwater remediation activities.

The ALARA Committee reviewed and approved both revisions to the RPP in accordance with License Condition 27(e)(3). The ALARA committee also completed the evaluation required by that license condition and determined that the RPP changes could be made without NRC approval or a license amendment.

Between the ALARA Committee review and approval of the first and second revisions, the RP procedure for performing these reviews was revised to provide improved definition of the considerations listed in License Condition 27(e)(2). The procedure was changed based on previous NRC inspection concerns and provides a more robust method for evaluating RPP changes. NRC comments on the improved process is encouraged.



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The electronic version of this submittal includes the following:

- ALARA Committee 27(e)(3) evaluation of CERT RPP Revision 0
- ALARA Committee 27(e)(3) evaluation of CERT RPP Revision 1
- CERT RPP Revision 1

Please contact me at (813) 962-1800 if you have any questions regarding this submittal.

Sincerely,

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Jay J. Maisler, CHP Radiation Safety Officer

Enclosures: As stated

cc: Jeff Lux, EPM Bill Halliburton, CERT David Cates, ODEQ Mike Broderick, ODEQ