
From: Linton, Ron
Sent: Thursday, October 25, 2012 3:06 PM
To: Jon Winter (USA - Casper)
Cc: Oxenberg, Tanya; Burrows, Ronald; Evans, Robert; Gersey, Linda; Webb, James; Cohen, Stephen; VonTill, Bill
Subject: NRC staff proposed language for SUA-1341 - LC 9.8
Attachments: Alternate language for release to unrestricted area (10-25-12 clean).pdf

Jon:
Attached is the NRC staff's proposal for License Condition (LC) 9.8, the only license condition to which Uranium One has not agreed. The NRC staff is proposing this LC after taking into consideration Uranium One's comments during the meeting on Oct 4, 2012.

Let me know if you have comments. We have a scheduled public meeting to discuss this LC for October 29, 2012 from 1:00-2:00 EDT (see ML12290A229).

Toll Free Number 800-369-1986
Participant passcode: 45746
OCT-29-2012 (Monday)
01:00 PM EASTERN TIME, 1 hr

Ron

- 9.8 Release of superficially contaminated equipment, materials, or packages for unrestricted use shall be in accordance with the NRC guidance document "Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use or Termination of Licenses for Byproduct, Source, or Special Nuclear Material," (the Guidelines) dated April 1993 (ADAMS Accession No. ML003745526) or suitable alternative procedures approved by NRC prior to any such release.

Where surface contamination by both alpha- and beta-gamma-emitting nuclides exists, the limits established for alpha- and beta-gamma-emitting nuclides shall apply independently.

Personnel performing contamination surveys for items released for unrestricted use shall meet the qualifications as health physics technicians or radiation safety officer as defined in Regulatory Guide 8.31 (as revised). Personal effects (e.g., notebooks and flash lights) which are hand carried need not be subjected to the qualified individual survey or evaluation, but these items should be subjected to the same survey requirements as the individual possessing the items.

Regulatory Guide 8.30 (as revised), Table 2, shall apply when releasing equipment, materials, or packages that have the potential for accessible surface contamination levels above background to unrestricted areas, regardless of the intent to release these items for unrestricted use. In addition, the licensee shall characterize any potential contamination for radionuclides not addressed by Regulatory Guide 8.30 (as revised), Table 2.

For release to unrestricted areas, the licensee shall provide its procedures for releasing equipment, materials, or packages that have the potential for accessible surface contamination levels above background to NRC for review and written verification. These procedures shall demonstrate how the licensee will maintain radiological controls over the equipment, materials, or packages that have the potential for accessible surface contamination levels above background until they have been released for unrestricted use as specified above and what methods will be used to limit the spread of contamination to unrestricted areas.

For releases with a final destination to one of the licensee's restricted areas, whether through an unrestricted area or not, the licensee may identify a qualified designee(s) to perform the surveys associated with releasing equipment, materials, or packages that have the potential for accessible surface contamination levels above background. The qualified designee(s) shall have completed education, training, and experience, in addition to general radiation worker training as specified by the licensee. The education, training, and experience required by the licensee for qualified designees shall be submitted to the NRC for review and written verification. The licensee must receive written verification prior to allowing the designee(s) to perform these surveys.

The licensee shall document their survey of equipment, materials, or packages prior to releasing them as discussed in this license condition.