

Comments on the Quality Assurance Project Plan (QAPP) - Radiological Effluent and Environmental Monitoring program by Lost Creek ISR, LLC (LCI)

1. In Section 1.4, Summary of Major Elements of the QAPP, the licensee discusses about establishing a Quality Assurance (QA) auditing plan. Please provide the QA audit plan.
2. Also, in Section 1.4, the licensee discusses lower limits of detection requirements. Please state the established requirements for sample and measurement precision and accuracy.
3. In Section 4.3, the licensee states that “LC project records will be legible, and identifiable, retained in predetermined locations.” However, the licensee has not identified these predetermined locations.
4. In Section 5.2.1, the licensee states that “EHS Supervisor/RSO shall regularly review the status and adequacy of LC Project QA.” Please state what are the different elements and the minimum frequency at which the status and adequacy of the Project QA that will be reviewed.
5. In Section 5.3.2, the licensee states that “air filters will be collected weekly and analyzed quarterly.” Please clarify whether a composite filter strategy will be used for sample analysis.
6. In Section 5.3.2, the licensee states that it will meet a lower limit of detection (LLD) of 0.33pCi/L for environmental monitoring of radon gas. However, Regulatory Guide 4.14 recommends an LLD of $2E-10\mu\text{Ci/ml}$ which is equivalent to 0.2pCi/L.
7. In Section 5.5, the licensee discusses utilizing a chain of custody for the purpose of listing all transfers of sample from collection through analysis and disposal. Please provide a sample of a chain of custody form.
8. In Section 5.5.2, it states that “The Radiological Effluent and Environmental Monitoring Program will have written procedures for all activities that generate data, such as sample collection, sample management and chain of custody documentation, sample preparation and analysis, data reduction and recording, data assessment and reporting, and final sample disposal.” Please have these written procedures available on-site for the preoperational inspection.

Enclosure