

NRC's Assessment of Westinghouse's Responses to 20.2002 RAI Responses

Notes on Hematite 20.2002 August 13, 2013 RAI Responses

CURRENT ISSUE

- U.S. Nuclear Regulatory Commission (NRC) asked Westinghouse Electric Company (WEC) in RAI #9 (for the May 2013 request) to "Please summarize the results of additional characterization data on the material associated with the approval of the May 2009 20.2002 that has already been shipped."
- WEC supplied a table with a row for every 5 railcars, indicating the Ci amount and the total volume. (There should be one sample lab analyzed per each railcar.)
- The total volume shipped is ~13,000 m³.
- The mean Tc-99 for the shipped material is ~10 pCi/g.
- WEC stated that the 95% UCL for this data is 0.295 Ci, but did not provide enough information to verify the calculation.

TALKING POINTS FOR RAI #9 FOLLOW-UP

- Now that WEC has collected a fair amount of data, they should revisit the original assumptions with that data.
- Consolidate and clarify the current knowledge on characterization of material.
- Show that given the current knowledge, WEC can calculate a mean value that will be within their limit. (This will help us and WEC recognize the likelihood of exceeding the Tc-99 Ci limit before the volume limit.)
- Provide the overall mean concentration values of data for the material that has been shipped and the material that will be shipped (including prior 20.2002s). (This should be a mean value as opposed to a median value).
- WEC should update Table 1 to reflect the current knowledge given recent characterization data.
- Certain parts of Table 2 may also need to be updated. (For example, the unexpected Tc-99 results for stockpile samples is based on the >99th percentile of the site wide Dataset (573 pCi/g)).
- WEC should explain how the former dose assessment bounds the updated values for Table 1 or provide updated dose assessments.
- WEC should provide data sufficient to reproduce the running UCL for Tc-99.
- WEC should present all relevant characterization data (prior and current) in a manner that provides clarity on the location of the excavated material and corresponding concentrations in relation to the samples that were presented with the original characterization data.
- The reasons for multiple 20.2002 requests should be transparent in the submittal. WEC should clearly state in the submittal why WEC did not anticipate the need to dispose of this volume of material when they submitted the prior requests (e.g., more VOC contamination and no onsite treatment, scheduling conflict with characterization of material, etc).