

January 15, 2014

MEMORANDUM TO: Michael Norato, Chief
Materials Decommissioning Branch
Division of Waste Management
and Environmental Protection
Office of Federal and State Materials
and Environmental Management Programs

FROM: John J. Hayes, Senior Project Manager **/RA/**
Materials Decommissioning Branch
Division of Waste Management
and Environmental Protection
Office of Federal and State Materials
and Environmental Management Programs

SUBJECT: PUBLICLY NOTICED CONFERENCE CALL SUMMARY

On November 20, 2013, a publicly noticed conference call was held between U.S. Nuclear Regulatory Commission (NRC) personnel from the Material Control, ISFSI, and Decommissioning Branch of NRC Region III, the Materials Decommissioning Branch of the Office of Federal and State Materials and Environmental Management Programs and representatives of the Westinghouse Electric Company (WEC) Hematite Facility located in Hematite, MO. No member of the public participated in the call.

Enclosure 1 was the agenda for the call. Enclosure 2 is a listing of the call participants.

In the introductory remarks, the NRC explained that the conference call was a Category 1 Publicly Noticed Call in which members of the public were invited to listen to the call consistent with past practice. The public would be allotted the opportunity to communicate with the NRC after the business portion of the call but before the call was adjourned. The NRC stated that there was nothing which required the licensee to respond to any comments or questions from members of the public. However, while there was no requirement to respond, there is also nothing which precludes the licensee from responding to questions if the licensee chooses to do so.

CONTACT: John Hayes, FSME/DWMEP
(301) 415-5928

The participants on the call introduced themselves. In response to the NRC's comments during the November 13, 2013, publicly noticed call, Westinghouse provided a response on November 19, 2013 (ADAMS Accession No. ML13330B678). Westinghouse's response was agenda item number 1 and was discussed during the call.

The second agenda item was the October 28, 2013, Westinghouse submittal of a Final Status Survey Release Record in Support of Hematite Decommissioning Project License Termination (ADAMS Accession No. ML13302C041). This submittal was to demonstrate the format and content for subsequent Final Status Survey Release Records (FSSRR) and was submitted to the NRC for review and comment. It was Westinghouse's hope that the NRC's review would enhance the quality and content of future submittals and might lessen the time for review and approval. During the call the NRC provided comments on the October 28th submittal. Some of those comments and Westinghouse's responses are included below:

- Westinghouse presents some conclusions in the Release Records but does not provide a clear description of how the conclusions were reached. As an example, in Section 6.0, *Conclusions*, it is stated, "Based upon the evaluation of all soil samples, the overall sum of fractions is calculated to be 0.04." It is unclear how the value of "0.04" was determined. The data in Table 5.3 has 10 of 13 biased samples with sum of fraction values > 0.04 and two at 0.04 and one at 0.03. Table 5.2, which is systematic soil samples, has 4 of 14 samples above 0.04 and 9 in the range of 0.02 through 0.04.

Westinghouse will provide a description of how the value of 0.04 was obtained.

- The footnotes to Tables were not noted in the Tables
- It was suggested that a change to the legend in Figure 5.4 be made to indicate a 100% scan was conducted
- It was suggested that a thorough technical review be conducted to identify erroneous data resulting from cut and paste errors. Previous NRC reviews have identified cut and paste errors which originate from the utilization of previous submittals as the templates for future documents.
- The Matrix of Hematite Decommissioning Project FSSRRs form is not current. Technical report numbers should be provided for LSA-05 areas and any other areas that have been started/completed. Also, LSA 05-01 was subdivided into LSA-05-01 and LSA-05-04.
- The title page for the FSSRR – Volume 2, Attachment 1, HDP-RPT-FSS-201-01, Revision 0, dated October 23, 2013 has signature lines for "Prepared by", "Reviewed by" and "Approved by". A "PRINTED" name, followed by a signature, as with other documents within the FSSRR, would be appropriate. Some of the signatures are undecipherable.
- Table 5.2, Note 3, page 13 of 22 states, "Ra-226 and Th-232 activities are subtracted from background prior to SOF calculation..." This should be reworded. Westinghouse is not subtracting the Ra-226 and Th-232 activities from background but is subtracting

background values from the soil sample analytical results. In Section 5.8, Page 20 of 22, Westinghouse states the process correctly in that “Ra-226 and Th-232 average backgrounds (1.0 pCi/g Th-232 and 1.47 pCi/g Ra-226) were subtracted from the analytical result prior to calculation of the SOF.” The same issue is present in Table 5.3.

- Section 2.2, Page 5 of 22, first sentence: Editorial error “Survey unit LSA-10-08 was created **within of** survey unit LSA-10-02...”
- Section 2.2, Page 5 of 22, second paragraph: “A total of eight (8), 6-inch lifts were excavated and surveyed within the footprint of LSA-10-08 in order to ensure the remediation action level (12,000 net counts per minute) was achieved.” The NRC understands that Westinghouse could not determine accurately activity below 3 inches of soil layers and that is why Westinghouse decided to use a 3-inch layer when scanning for fuel pellets. Hence, they decided a soil sorter and 3 inch soil layer was the best technical way to achieve compliance for releasing soil piles.

Westinghouse indicated that seeing pellets below 3 inches has been addressed.

- Figure 5.4, page 19 of 22: The figure does not indicate a 100% gamma walkover scan. Also, south of Biased Area #3 are two red dots indicating possible contamination. Figure 5.2 does not indicate that biased soil samples were collected in this area.

Westinghouse will provide a revised Figure which indicates a 100% gamma walkover scan.

- In the last page of the record, the Beta/Gamma Daily Source Check for the Ludlum 2221 Ludlum 44-10 NaI detector indicated that all Quality Control (QC) source check measurements for the Month of August 2013 were above the mean value as determined from the calibration. Typically, one would expect the daily QC checks to fluctuate above and below the mean.

Westinghouse will check on this comment.

Enclosures:

1. Agenda
2. Attendee List

- background values from the soil sample analytical results. In Section 5.8, Page 20 of 22, Westinghouse states the process correctly in that “Ra-226 and Th-232 average backgrounds (1.0 pCi/g Th-232 and 1.47 pCi/g Ra-226) were subtracted from the analytical result prior to calculation of the SOF.” The same issue is present in Table 5.3.
- Section 2.2, Page 5 of 22, first sentence: Editorial error “Survey unit LSA-10-08 was created **within of** survey unit LSA-10-02....”
- Section 2.2, Page 5 of 22, second paragraph: “A total of eight (8), 6-inch lifts were excavated and surveyed within the footprint of LSA-10-08 in order to ensure the remediation action level (12,000 net counts per minute) was achieved.” The NRC understands that Westinghouse could not determine accurately activity below 3 inches of soil layers and that is why Westinghouse decided to use a 3-inch layer when scanning for fuel pellets. Hence, they decided a soil sorter and 3 inch soil layer was the best technical way to achieve compliance for releasing soil piles.

Westinghouse indicated that seeing pellets below 3 inches has been addressed.

- Figure 5.4, page 19 of 22: The figure does not indicate a 100% gamma walkover scan. Also, south of Biased Area #3 are two red dots indicating possible contamination. Figure 5.2 does not indicate that biased soil samples were collected in this area.

Westinghouse will provide a revised Figure which indicates a 100% gamma walkover scan.

- In the last page of the record, the Beta/Gamma Daily Source Check for the Ludlum 2221 Ludlum 44-10 NaI detector indicated that all Quality Control (QC) source check measurements for the Month of August 2013 were above the mean value as determined from the calibration. Typically, one would expect the daily QC checks to fluctuate above and below the mean.

Westinghouse will check on this comment.

Enclosures:

1. Agenda
2. Attendee List

DISTRIBUTION:

RidsOgcMailCenter JTapp

ML14006A308

OFFICE	DWMEP	DWMEP	DWMEP	DWMEP
NAME	JHayes	SAchten	MNorato	JHayes
DATE	1/10/14	1/14 /14	1/ 15 /14	1/ 15 /14

OFFICIAL RECORD COPY

FORTHCOMING PUBLIC MEETING ON WESTINGHOUSE HEMATITE
DECOMMISSIONING TECHNICAL DISCUSSIONS

Agenda
Wednesdays, November 20, 2013
11:00 AM – 12:00 PM

- *Introductory Remarks – NRC*
- *Topics for Discussion –*
 - *Westinghouse response to NRC criticality safety issues associated with chemical treatment of waste at USEI*
 - *NRC Assessment of Westinghouse October 28, 2013 Final Status Survey Release Record Report*
- *Public's Opportunity for Questions - Public*
- *Concluding Remarks – NRC*

Attendance List
November 20, 2013 Conference Call

Name	Organization	Title
Wade Adams	ORAU	Project Manager/Health Physicist Independent Environmental Assessment and Verification Program
Joe Guido	Westinghouse	Radiation Safety Officer, Hematite Decommissioning Project
Joe Smetanka	Westinghouse	Director, Hematite Decommissioning Project
Derek Mann	Westinghouse	Nuclear Criticality Safety Specialist, Hematite Decommissioning Project
Rock Neveau	Westinghouse	Radiation Safety Engineer, Hematite Decommissioning Project
Bill Mattern	Westinghouse	Security Manager, Hematite Decommissioning Project
Michele Bresnahan	Westinghouse	Radiation Safety Engineer, Hematite Decommissioning Project
Kevin Davis	Westinghouse	Licensing/Environmental Manager, Hematite Decommissioning Project
Dennis Richardson	Westinghouse	Deputy Director, Hematite Decommissioning Project
Joe Weismann	U.S. Ecology, Inc.	Vice President, Radiological Programs and Field Services
John Hayes	NRC, FSME	Senior Project Manager, Materials Decommissioning Branch
Mike Norato	NRC, FSME	Chief, Materials Decommissioning Branch