

October 2, 2014 Public Meeting  
With  
AUC and NRC

The purpose of this meeting is to identify those RAIs where additional information is needed to complete the writing of the SER. Failure to obtain this information may result in a license condition.

1) RAI 23, RAI 24, and RAI 25

Applicant indicated that they will sample prior to construction but as of June 2014 AUC Response, there is no data.

NRC staff is requesting data for these samples to complete SER. The data would indicate that the samples were collected in accordance with RG 4.14.

2) RAI 26

Applicant provided reference for surface water data. A review of the surface water data shows that the applicant did not analyze for dissolved and suspended solids for Unat. RG 4.14 recommends dissolved and suspended solids for Unat for surface water.

Applicant needs to provide data for dissolved and suspended solids for Unat for surface water or provide results if they are available.

3) RAI 37

Applicant needs to provide more information regarding to how they determine how they got 4 air exchanges per hour. NRC staff cannot determine the volume of 4 air exchanges per hour. The applicant should show the volume of the facility where 4 air exchanges per hour will be achieved and also demonstrate that the ventilation exhaust (fans) have the capacity to achieve 4 air exchanges per hour.

4) RAI 41, RAI 50, and RAI 74

The applicant indicated that they will provide to the NRC staff, for review and written verification, written procedures for its airborne effluent and environmental monitoring program no later than 30 days before the preoperational inspection to show compliance with 10 CFR 40.65.

NRC staff has determined that the applicant's response would require a license condition. The applicant needs to consider that if the response is not acceptable, this may delay operations. NRC staff recommends resolving this issue as soon as possible to avoid a license condition.

NRC staff is seeking the following information:

- Identify all potential air and gaseous effluent release points
- Discuss how each potential air and gaseous effluent release point will be monitored and how this information (or data) will be incorporated into the 10 CFR 40.65 report
- Discuss how the measurements from each potential air and gaseous effluent release point will be expressed as a quantity (as described in 10 CFR 40.65).
- Discuss the type of radiation measuring device and measurement of the effluent and how the measurements will be converted to a total quantity (expressed in Curies) and a release rate (Curies per unit time).

If the applicant chooses to measure at a fence line (or restricted or control area), the applicant should demonstrate how the data from the measurements at a fence line will be extrapolated back to an effluent release point to identify the quantities of the principal radionuclides released to the environment.

5) RAI 42

The applicant indicated that the designee's training and qualification will be consistent with his/her level of responsibility, and will also be consistent with RG 8.31. The applicant provided a list of the training and qualification. NRC staff reviewed the list and determined that it is not consistent with RG 8.31. For example, RG 8.31 includes 2 years of relevant work experience in applied radiation protection. The response states a minimum of three months experience at the Reno Creek ISR Facility. The response is not consistent with RG 8.31.

It is recommended that the applicant review Crow Butte SER (ML14149A433) and Lost Creek SER for Amendment (ML13016A071) and determine if these programs are acceptable for provide an alternative response for NRC review.

6) RAI 46 and RAI 49

The applicant provided MDAs for alpha measurements but no MDAs for beta measurements. This is not consistent with the response to RAI 49

7) RAI 52

(See RAI 26)

- 8) New (Additional RAI) for Meteorology and Representativeness. The applicant needs to determine if important meteorological parameters (wind speed and wind direction) are representative.