

RAI 36:

Description of Deficiency: The applicant did not address NUREG-1569, Acceptance Criterion 5.7.6.3(9).

Basis for Request: NUREG-1569, Acceptance Criterion 5.7.6.3(9), states: “Appropriate criteria are established to relinquish possession or control of equipment or scrap having surfaces contaminated with material in excess of the limits specified in Table 5.7.6.3-1:

- (a) The applicant will provide detailed information describing the equipment, or scrap; the radioactive contaminants; and the nature, extent, and degree of residual surface contamination.
- (b) The applicant will provide a detailed health and safety analysis that reflects that the residual amounts of contaminated materials on surface areas, together with other considerations such as prospective use of the equipment, or scrap, are unlikely to result in an unreasonable risk to the health and safety of the public.
- (c) The applicant includes materials created by special circumstances including, but not limited to, the razing of buildings, transfer of structures or equipment, or conversion of facilities to a long-term storage facility or to standby status.”

Request for Additional Information Please address NUREG-1569, Acceptance Criterion 5.7.6.3(9), for operations or indicate where this can be found in the application.

RAI 36 Response (09/25/14):

Section 6.3 has been revised to conform to NUREG-1569, Table 5.7.6.3-1.



In both instances, the hole is re-filled from the surface after the pipe is removed.

8. The drill pits will be filled back with the soil excavated during construction, taking care to replace the topsoil.
9. An amount of time to allow for settling of the soil in the drill pit is allowed prior to final reclamation smoothing and reseeding of the drill site.

6.2.3.2 Buried Trunklines, Pipes, and Equipment

Buried process-related piping, such as injection and production lines, will be removed from the MU undergoing decommissioning. Salvageable lines will be held for use in ongoing mining operations. Lines that are not reusable may either be assumed to be contaminated and disposed of at a licensed disposal site or may be surveyed and, if suitable for release to an unrestricted area, may be sent to a sanitary landfill.

6.3 Removal and Disposal of Structures, Waste Materials, and Equipment

CBR would submit a final and detailed decommissioning plan for structures and equipment to the NRC for review and approval at least 12 months before the decommissioning of such structures and equipment. This final decommissioning plan would include a description of structures and equipment to be decommissioned, planned decommissioning activities, methods to be used to ensure protection of workers and the environment against radiation hazards, the planned final radiation survey, and an updated detailed cost estimate.

The procedures to be used for removing and disposing of structures, waste materials, and equipment would meet the following criteria:

- A written program is in place to control residual contamination on structures and equipment.
- Measurements of radioactivity on the interior surface of pipes, drain lines, and duct work would be taken at all traps and other appropriate access points, provided that such contamination is likely to be representative of contamination on the interior of the pipes, drain lines, and ductwork.
- Any surfaces of premises, equipment, or scrap that would likely be contaminated, but are of such size, construction, or location as to make the surface inaccessible for measurement, would be presumed to be contaminated in excess of the limits.
- Prior to the release of structures for unrestricted use, a comprehensive radiation survey would be made to establish that contamination is within the limits specified in NRC Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use or Termination of Licenses for Byproduct, Source, or Special Nuclear Material (NRC 1993), and NRC approval would be obtained.
- A contract between CBR and a waste disposal operator would be in place to dispose of 11e.(2) byproduct material.

Equipment or scrap with surface contamination in excess of NUREG-1569, Table 5.7.6.3-1, will not be released for unrestricted use.