

September 2, 2015

MEMORANDUM TO: Michael Norato, Chief
Materials Decommissioning Branch
Division of Decommissioning, Uranium Recovery,
and Waste Programs
Office of Nuclear Material Safety
and Safeguards

FROM: Karen Pinkston, Systems Performance Analyst */RA/*
Performance Assessment Branch
Division of Decommissioning, Uranium Recovery,
and Waste Programs
Office of Nuclear Material Safety
and Safeguards

SUBJECT: PUBLICLY NOTICED TELECONFERENCE SUMMARY

On August 19, 2015, a publicly noticed teleconference was held between the U.S. Nuclear Regulatory Commission (NRC) personnel from the Office of Nuclear Material Safety and Safeguards and Region III and representatives of Westinghouse. The purpose of this teleconference was to discuss issues related to the final status survey (FSS) at the Hematite Site in Festus, Missouri. This teleconference was a follow up to the public teleconference held on August 11 and 12, 2015 (Agencywide Document and Access Management System [ADAMS] Accession No. ML15230A319). The NRC and Westinghouse discussed items from July 17, 2015 NRC letter (ML15196A606) that had not been resolved in the previous teleconference. These items included: the demonstration of compliance with the dose criteria in 10 CFR 20.1402, the DCGL versus gamma walkover surveys, and sidewall sampling. The NRC and Westinghouse also discussed Westinghouse's proposed final status survey report (FSSR) outline.

Issues from NRC's July 17, 2015 letter

Demonstration of compliance with the dose criteria in 10 CFR 20.1402

Following the teleconference on August 11 and 12, 2015, Westinghouse provided the NRC with a revised version of its Final Status Survey Data Evaluation procedure to address comments raised by the NRC related to the calculation of the sum of fractions (SOF). Following its review of the changes made to this document, the NRC staff asked for clarification on the calculation of the SOF for backfill material that is evaluated against the three stratum derived concentration guideline levels (DCGLs). Westinghouse committed to providing the NRC with a description and/or equation for how the three stratum approach will be implemented for reuse backfill.

Sidewall Sampling

Following the teleconference on August 11 and 12, 2015, Westinghouse provided the NRC with a revised "Sidewall sampling of Land Survey Areas" (HEM-15-MEMO-038) to address comments raised by the NRC during the teleconference on August 11 and 12th, 2015. Two changes had been made to this memo: the first criteria (i.e., only sampling the sidewall if a sample exceeded 10% of the DCGL_w) was removed and a definition of "vertical or near-vertical" was added. During the teleconference on August 19th, the NRC and Westinghouse discussed the definition of "vertical or near-vertical" and agreed that defining "vertical or near-vertical" as a slope that is greater than 45° would eliminate ambiguity in what constitutes a sidewall. As a result, Westinghouse is going to edit the definition of "vertical or near-vertical" to include a slope of greater than 45°.

DCGL versus Gamma Walkover Survey

The NRC staff had a number of questions for Westinghouse regarding the development of counts per minute (cpm) versus DCGLs. The NRC staff asked for the basis for not including the surveyor efficiency of 0.75 and the basis for modeling the air gap as 1 inch in its Microshield calculations. Westinghouse responded that these values reflect what is happening in the field. Westinghouse stated that the Microshield calculations are based on a stationary measurement, so the surveyor efficiency is one and that the measurement is made at 1 inch. The NRC staff then asked for information on how Westinghouse is detecting the counts when the minimum detectable concentration (MDC) is close to the DCGLs. Westinghouse stated they can detect areas above the MDC because technicians are able to recognize elevated areas due to increase in audible counts, technicians have digital count rates which would display elevated readings, and the gamma walk over survey data is post-processed. The NRC staff asked if the IAL is calculated based on a stationary measurement, then what determines when the technician stops during a survey. Westinghouse stated that this is described in HDP-PR-FSS Rev 6. This procedure states that the technician stops if an elevated value greater than the scan MDC is detected.

The NRC staff noted that Westinghouse's procedure for the survey (i.e., hold the probe as close as possible at 1 inch, but not to exceed 3 inches) is difficult to implement. NRC staff asked what Westinghouse is doing to ensure that this air gap is being met and whether Westinghouse was using a jig. Westinghouse stated that a jig was not being used and that they were using training and management checks to ensure that the procedures were being followed.

The NRC staff asked for the justification that the MDC is adequate when it is greater than 50% of the DCGL_w value. Westinghouse stated that the 50% value in the decommissioning plan (DP) is a target and not a hard and fast limit. Westinghouse stated that if the MDC is greater than the DCGL_w value, the grid spacing could be decreased to account for this.

NRC staff stated that it has no additional questions and can close the inspection follow-up item (IFI) on this issue in a future inspection report. The NRC staff said that it would continue to observe the implementation of the procedures during future inspections. The NRC staff noted that Westinghouse should provide a justification in the FSSR when the MDC is higher than the target value in the DP (50% of the DCGL). NRC staff also stated that the full NRC headquarters review of this topic will occur when the FSSR is submitted.

Summary of Status of FSS Issues Identified in NRS's July 17, 2015 letter

- Inputs to the scan MDC – item was resolved in Aug 11-12, 2015 teleconference
- Description of remediation activities following initiation of FSS – item was resolved in Aug 11-12, 2015 teleconference
- Appropriate sampling of the reuse pile – item was resolved in Aug 11-12, 2015 teleconference
- Demonstration of compliance with the dose criteria in 10 CFR 20.1402 – Westinghouse is providing a description and/or an equation for how the three stratum approach will be implemented for reuse backfill
- DCGL vs Gamma Walkover Survey – the NRC staff has no additional questions on this item and can close the IFI in a future inspection report. NRC staff noted that Westinghouse should provide a justification in the FSSR when the MDC is higher than the target value in the DP (50% of the DCGL). NRC staff also noted that the full NRC headquarters review of this topic will occur when the FSSR is submitted.
- Sidewall Sampling – Westinghouse is editing the definition of “vertical or near-vertical” to include a slope of greater than 45 degrees
- Identification of Burial Pits – during the Aug 11-12, 2015 teleconference, the NRC and Westinghouse decided that Westinghouse would address this issue by providing documentation in the FSSR to describe how there is reasonable assurance that all burials have been removed

FSSR Outline

The NRC and Westinghouse discussed the process that Westinghouse would use to submit the FSSR documents. Westinghouse said that the sections of the FSSR were going to be submitted piecemeal and that its immediate plan is to generate the first chapter of each volume. Westinghouse stated that the FSSR would be updated to reflect any requests for additional information (RAIs) that the NRC may have to create one standing document. Westinghouse also stated that it would be providing the NRC with the outlines for the release records for the land survey areas, building survey areas, and piping survey areas. Westinghouse and the NRC

The NRC staff the provided its comments on the FSSR outline. Key comments included:

- When the DP or RAIs are cited, provide a specific reference so that the NRC staff can read the quote in context. It is also useful for the ADAMS accession number or other unique identifier (e.g., document number and rev number) to be cited.
- It would be useful to have figures showing the different survey units and their classifications.
- In Volume 3, Chapter 1, Sections I.i and I.ii, a justification for there being reasonable assurance that all radiologically contaminated burials have been removed should be provided.
- Volume 3, Chapter 1, Section I.ii refers to the DP requirements for remediation of undocumented burials. The NRC staff does not believe that the criteria for identifying undocumented burials were included in detail in the DP. The criteria in the DP focused on determining the extent of a burial once the burial had been identified.
- When something is described as being conservative, it is important to justify how it is conservative.
- Volume 7 should include a table that has the total dose per survey unit including all sources (e.g., soil, groundwater, piping).

During the public teleconference on August 11 and 12, 2015 Westinghouse proposed that the NRC and Westinghouse hold a face to face meeting in September. This meeting would involve a more in depth discussion of the FSSR, including revised reports for LSA 10-01 and 10-02 that Westinghouse plans to submit to the NRC. During the teleconference on August 19, 2015, Westinghouse proposed that the NRC and Westinghouse continue holding teleconferences instead of meeting face to face as long as resolution is being reached in the teleconferences. Westinghouse is evaluating its schedule for developing the content of the overview material in the FSSR. Westinghouse plans to contact the NRC to discuss the schedule for submitting these documents to the NRC and to determine a schedule for future teleconferences.

Summary of Action Items Related to the FSSR

- Westinghouse is going to contact the NRC to discuss its schedule for submitting the FSSR overview documents to the NRC and to determine a schedule for future teleconferences.
- Westinghouse is going to provide outlines of the release record chapters of the FSSR for Volume 3 (land survey areas), Volume 4 (building survey areas), and Volume 5 (piping survey areas) to the NRC. Westinghouse and the NRC will discuss these outlines at a future teleconference.

Docket No. 070-00036
License No. SNM-00033

Enclosure:
Participant List

During the public teleconference on August 11 and 12, 2015 Westinghouse proposed that the NRC and Westinghouse hold a face to face meeting in September. This meeting would involve a more in depth discussion of the FSSR, including revised reports for LSA 10-01 and 10-02 that Westinghouse plans to submit to the NRC. During the teleconference on August 19, 2015, Westinghouse proposed that the NRC and Westinghouse continue holding teleconferences instead of meeting face to face as long as resolution is being reached in the teleconferences. Westinghouse is evaluating its schedule for developing the content of the overview material in the FSSR. Westinghouse plans to contact the NRC to discuss the schedule for submitting these documents to the NRC and to determine a schedule for future teleconferences.

Summary of Action Items Related to the FSSR

1. Westinghouse is going to contact the NRC to discuss its schedule for submitting the FSSR overview documents to the NRC and to determine a schedule for future teleconferences.
2. Westinghouse is going to provide outlines of the release record chapters of the FSSR for Volume 3 (land survey areas), Volume 4 (building survey areas), and Volume 5 (piping survey areas) to the NRC. Westinghouse and the NRC will discuss these outlines at a future teleconference.

Docket No. 070-00036
License No. SNM-00033

Enclosure:
Participant List

DISTRIBUTION:

MLaFranzo ROrlikowski

ADAMS Accession No. ML15238B021 (Pkg); ML15228B032 (Memo and Enclosure 1);

OFFICE	NMSS	NMSS	NMSS	NMSS
NAME	KPinkston	CHolston	MNorato	KPinkston
DATE	08/26/15	09/1/15	09/1/15	09/2/15

OFFICIAL RECORD COPY

Participant List

U.S. Nuclear Regulatory Commission

Michael Norato
Karen Pinkston
Duane Schmidt
Katie Tapp
Michael LaFranzo
Bob Orlikowski

Westinghouse

Joe Smetanka
Gay Fussell
Clark Evers
Scott Zoller
Ken Pallagi
Brian Miller
Bill Snell
Andy Lombardo
Mike McCann
Doug Weaver
Camille Zozula

Member of the Public

Ruth Thomas, Environmentalists, Inc.

Enclosure