

**From:** [Parrott, Jack](#)  
**To:** [Dayvault, Jalena \(Jalena.Dayvault@lm.doe.gov\)](#)  
**Cc:** [Barr, Deborah](#); [Fuhrmann, Mark](#); [Meyer, Matthew](#); [Norato, Michael](#); [Watson, Bruce](#); [Olmstead, Joan](#)  
**Subject:** Path forward on mill tailing covers research project  
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Jalena,

After discussions with OGC here at NRC, and with staff working on radon barrier issues, here is our proposed path forward for the radon covers research -

For our part of the research support, NRC will prepare a justification for classification of this action as a Categorical Exclusion under 10 CFR 51.22(c)(6) which is for confirmatory research. This Categorical Exclusion documentation goes to the NRC site PM. If DOE has a Categorical Exclusion similar to 10 CFR 51.22(c)(6) for mill tailing sites, that information and documentation would be helpful.

For the actual research work itself, DOE will send the detailed work plan and a statement that this work is not "significant construction, actions, or repairs" and why, to the NRC site PM, Jack Parrott. DOE should base its significance determination on evaluation of potential doses from the activity, and potential for that activity to impact a structure, system or component such that a substantial safety hazard could occur.

The detailed work plan will address the following:

1. Health and safety, including radiation protection and dosimetry,
2. Details on the cover repair process,
3. Statement that the radon barrier will be tested to confirm that it is re-installed to original specifications. Radon flux measurements will be done before barrier removal (this is part of the research) and after replacement of the barrier, at each location.

Also, we will need statements addressing how work for the project will comply with the NEPA, NHPA, and ESA, to help satisfy NRC's responsibilities under these statutes. These can reference previous studies. I understand that these items may be covered by the work plan or other related documentation.

If you have any questions let me know.

Jack

Jack D. Parrott

Senior Project Manager

US Nuclear Regulatory Commission

301-415-6634