

March 8, 2016

MEMORANDUM TO: Christopher McKenney, Branch Chief
Performance Assessment Branch
Division of Decommissioning, Uranium Recovery
and Waste Programs
Office of Nuclear Material Safety and Safeguards

FROM: A. Christianne Ridge, Sr. Systems Performance Analyst */RA/*
Performance Assessment Branch
Division of Decommissioning, Uranium Recovery
and Waste Programs
Office of Nuclear Material Safety and Safeguards

SUBJECT: UPDATE ON THE U.S. NUCLEAR REGULATORY COMMISSION
PARTICIPATION IN ACTIVITIES OF THE ELECTRIC POWER
RESEARCH INSTITUTE WORKING GROUP ON THE
U.S. NUCLEAR REGULATORY COMMISSION BRANCH
TECHNICAL POSITION ON CONCENTRATION AVERAGING
AND ENCAPSULATION

The U.S. Nuclear Regulatory Commission (NRC) staff is participating in a working group created by the Electric Power Research Institute (EPRI) regarding the NRC Branch Technical Position on Concentration Averaging and Encapsulation (CA BTP). The working group includes representatives of utilities, waste processors, and disposal site operators, as well as Agreement State regulators and the NRC staff. The purpose of the working group is to produce an EPRI implementation guide for Nuclear Power Plant (NPP) licensees, including examples specific to NPP operations. The NRC participation has been limited to clarification of positions in the CA BTP and has not resulted in any regulatory decisions or commitments. A summary of the working group's February 23, 2016, teleconference is enclosed for your use.

Enclosures:

1. Summary of February 23, 2016, Teleconference
2. List of Teleconference Participants

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**Update on the U.S. Nuclear Regulatory Commission Participation in Activities
of the Electric Power Research Institute Working Group
on the U.S. Nuclear Regulatory Commission Branch Technical Position
on Concentration Averaging and Encapsulation**

Working Group Purpose

The working group was established by the Electric Power Research Institute (EPRI). The purpose of the working group is to produce an EPRI implementation guide for Nuclear Power Plant (NPP) licensees, including examples specific to NPP operations. The EPRI has stated that it will make the implementation guide free and publicly available. The U.S. Nuclear Regulatory Commission (NRC) participation has been limited to clarification of positions in the Branch Technical Position on Concentration Averaging and Encapsulation (CA BTP) and has not resulted in any regulatory decisions or commitments.

Previous Activities

The working group previously held a kick-off teleconference on April 23, 2015; a two-day meeting in Orlando, Florida, on June 18-19, 2015; and a two-day meeting from November 5-6, 2015, in Dallas, Texas. A summary of those meetings is available in the NRC Agencywide Documents Access and Management System (ADAMS) at Accession Number ML15321A165.

Meeting Summary

The working group held a teleconference on February 23, 2016. The purpose of the teleconference was for EPRI to collect and discuss comments on a revised draft document, which had been provided to the working group prior to the meeting. Only one issue was raised that required further clarification from the NRC staff. A working group member asked if the encapsulation guidance in the working group document should specify that encapsulating media should meet stability criteria such as those used to show compliance with 10 CFR 61.56(b). The NRC staff indicated that the revised CA BTP does not require the encapsulating medium to meet stability requirements, but that the issue would be discussed with additional NRC staff and management to determine if any public clarification was necessary.

The NRC staff also discussed clarifications that the NRC staff had made publically available on the NRC CA BTP webpage since the previous meeting (ADAMS Accession Number ML16049A415).

The EPRI staff discussed the proposed timeline for the remainder of the project and indicated that after incorporation of comments discussed during the teleconference, the document would be sent to the working group members for a final review. The EPRI staff also briefly discussed potential impacts to the timeline of the NRC *Federal Register* notice (FRN) requesting comments about the distinction between contaminated trash and contaminated materials (81 *Federal Register* 3166, January 20, 2016). The NRC staff had identified this issue as potentially requiring further clarification in the FRN issued with publication of the revised CA BTP (80 *Federal Register* 10165, February 25, 2015). The issue was discussed in greater detail at the previous working group meeting.

ENCLOSURE 1

**Electric Power Research Institute Working Group
on the U.S. Nuclear Regulatory Commission Branch Technical Position
on Concentration Averaging and Encapsulation**

TELECONFERENCE PARTICIPANTS <i>February 25, 2016</i>		
Lisa Edwards	EPRI	Sr. Program Manager
Mike Snyder	EPRI	Sr. Technical Leader
Tom Kalinowski	DW James Consulting	EPRI Principal Investigator and Shipping Expert
Clint Miller	PG&E	Utility
Glen Vickers	Exelon	Utility
Jim Alldredge	Luminant	Utility
Mark Ross	Exelon	Utility
Dan Shrum	EnergySolutions	Disposal Site
Kurt Colborn	Waste Control Specialists	Disposal Site
Christianne Ridge	U.S. NRC	Federal Regulator
Brad Broussard	Texas	State Regulator
Ron Wheeler	Southern Nuclear Operating Co.	Utility
Rusty Lundberg	Utah	State Regulator