

**From:** [Yadav, Priya](#)  
**To:** [Woods, Sylvia](#)  
**Subject:** FW: RE: RE: Clarification of Several Comments on NUREG-2175  
**Date:** Wednesday, April 20, 2016 9:57:01 AM  
**Attachments:** [Section 4 Table Clarification.xlsx](#)

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Sylvia:

Please enter this email string and the attachment into ADAMS under Docket ID NRC-2015-0003.

Can you please add it to Package ML15218A481, Comments on Guidance for Conducting Technical Analyses for 10 CFR Part 61.

This is a low priority, and can be done anytime in the next two weeks.

Thank you,  
Priya

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**From:** Dan Shrum [mailto:[dshrum@energysolutions.com](mailto:dshrum@energysolutions.com)]  
**Sent:** Monday, April 18, 2016 3:54 PM  
**To:** Yadav, Priya <[Priya.Yadav@nrc.gov](mailto:Priya.Yadav@nrc.gov)>  
**Cc:** Esh, David <[David.Esh@nrc.gov](mailto:David.Esh@nrc.gov)>; Arlt, Hans <[Hans.Arlt@nrc.gov](mailto:Hans.Arlt@nrc.gov)>; Grossman, Christopher <[Christopher.Grossman@nrc.gov](mailto:Christopher.Grossman@nrc.gov)>  
**Subject:** [External\_Sender] RE: RE: Clarification of Several Comments on NUREG-2175

Apologize for the delay – we had a miss-communication on my end. Attached are the checked references.

Dan

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**From:** Yadav, Priya [mailto:[Priya.Yadav@nrc.gov](mailto:Priya.Yadav@nrc.gov)]  
**Sent:** Tuesday, March 22, 2016 8:57 AM  
**To:** Dan Shrum  
**Cc:** Esh, David; Arlt, Hans; Grossman, Christopher  
**Subject:** RE: RE: Clarification of Several Comments on NUREG-2175

No problem, but please check that all the references in the table are as you and Brooke had intended (there are 13 line items) and send me the corrections.

Thanks!

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**From:** Dan Shrum [mailto:[dshrum@energysolutions.com](mailto:dshrum@energysolutions.com)]  
**Sent:** Tuesday, March 22, 2016 10:42 AM  
**To:** Yadav, Priya <[Priya.Yadav@nrc.gov](mailto:Priya.Yadav@nrc.gov)>  
**Cc:** Esh, David <[David.Esh@nrc.gov](mailto:David.Esh@nrc.gov)>; Arlt, Hans <[Hans.Arlt@nrc.gov](mailto:Hans.Arlt@nrc.gov)>; Suber, Gregory <[Gregory.Suber@nrc.gov](mailto:Gregory.Suber@nrc.gov)>; Grossman, Christopher <[Christopher.Grossman@nrc.gov](mailto:Christopher.Grossman@nrc.gov)>  
**Subject:** [External\_Sender] RE: Clarification of Several Comments on NUREG-2175

I am confirming, but I believe it refers to section 4.3.1, Page 4-11, line 28.

Not a good excuse, but I had comments coming in from a variety of places and I was pulling them together on a state holiday (July 24<sup>th</sup>). I ran into some formatting issues and may have missed this one. Don't know why it isn't in the correct order, however. Let me check with Brooke.

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**From:** Yadav, Priya [<mailto:Priya.Yadav@nrc.gov>]  
**Sent:** Tuesday, March 22, 2016 8:00 AM  
**To:** Dan Shrum  
**Cc:** Esh, David; Arlt, Hans; Suber, Gregory; Grossman, Christopher  
**Subject:** RE: Clarification of Several Comments on NUREG-2175

Thanks for the clarification, Dan! And by the way, thank you for your detailed comments. They are very helpful and useful to us in drafting the final guidance.

I also wanted to mention that the table under Ch 4 comments on page 6 and 7 of the guidance specific comments (page 22/23 of the PDF) doesn't seem to refer to the right sections. For example, Section 4.1 is on page 4-2, doesn't have a line 28 and does not mention reasonably foreseeable scenarios.

Can you please send a new table to clarify the comment?

The final Guidance document is available at the following link.

<http://pbadupws.nrc.gov/docs/ML1505/ML15056A516.pdf>

all the other background materials are also on the webpage

<http://www.nrc.gov/about-nrc/regulatory/rulemaking/potential-rulemaking/uw-streams.html#2015prgpc>

Please let me know if you can't access the document, and thanks again for the clarification.

*Priya Yadav, P.E.*

Project Manager

Low-level Waste Branch

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**From:** Dan Shrum [<mailto:dshrum@energysolutions.com>]  
**Sent:** Monday, March 21, 2016 11:44 AM

**To:** Yadav, Priya <[Priya.Yadav@nrc.gov](mailto:Priya.Yadav@nrc.gov)>

**Cc:** Esh, David <[David.Esh@nrc.gov](mailto:David.Esh@nrc.gov)>; Arlt, Hans <[Hans.Arlt@nrc.gov](mailto:Hans.Arlt@nrc.gov)>; Dembek, Stephen <[Stephen.Dembek@nrc.gov](mailto:Stephen.Dembek@nrc.gov)>

**Subject:** [External\_Sender] RE: Clarification of Several Comments on NUREG-2175

Below are answers to your questions. We didn't realize that the preliminary draft rule had different section #s from the published draft rule. This would be the source of confusion with our comments – please accept my apology.

**No 10. Section 2.3.4 is noted in your comments.**

The introduction of additional requirements for the assessment of site characteristics based on waste concentration adds additional confusion to an already burdensome and convoluted process. It is unclear how these time frames for analyses based on concentration limits should be incorporated into other analyses including site stability, intruder analysis and protective assurance period compliance analyses. As the

requirements are not included in the rule, they should be removed from the guidance.

Is this comment referring to Section 2.3.2.4 Site Characteristics, on page 2-25, the A), B), and C)?

Please clarify.

This comment refers to Section 2.3.2.4, and the time frames are listed on page 2.25 under A), B) and C).

**No 11. Section 2.3.5 is noted in your comments.**

The table for required analyses based on site characteristics again adds confusion to the burdensome licensing process. It is unclear if the analyses required are dependent upon the waste concentration as prescribed in §2.3.4. We recommend providing additional context for the table and including guidance regarding the site characteristic requirements.

Is this comment referring to Section 2.5.3.1.2.1 Regulatory, p. 2-35, Table 2-1 Analyses Required for Included FEPs Based on 61.50? Please clarify.

This comment refers to Section 2.5.3.1.2.1 Regulatory, p. 2-35, Table 2-1 Analyses Required for Included FEPs Based on 61.50. Also, section 2.3.4 refers to what should be section 2.3.2.4 as corrected in the above comment.

**Summary Comment 3.**

Time periods for analyses and additional considerations based on waste concentration are introduced in this chapter, including for example those in §2.3.4, that are not included in the rule.

Is this comment again referring to Section 2.3.2.4 Site Characteristics?

This comment also refers to the timeframes described in the table in Section 2.3.2.4 Site Characteristics.

Thank you for reaching out to us for clarification.

*Daniel B. Shrum*

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**From:** Yadav, Priya [<mailto:Priya.Yadav@nrc.gov>]

**Sent:** Thursday, March 17, 2016 9:32 AM

**To:** Dan Shrum

**Cc:** Esh, David; Arlt, Hans; Dembek, Stephen  
**Subject:** Clarification of Several Comments on NUREG-2175

Hi Dan. Thank you for your comments on the Draft NUREG-2175, Guidance for Conducting Technical Analyses for 10 CFR Part 61, received under Docket ID NRC-2015-003.

In looking at your comments, we had a few questions. In Chapter 2, there are three comments that reference Section 2.3.4 of the document, which does not exist in the file that is available for public comment. We were thinking this could be a typo, but wanted to ask you to clarify and re-send your comments to us, so we can be sure to understand the comment.

[No 10. Section 2.3.4 is noted in your comments.](#)

The introduction of additional requirements for the assessment of site characteristics based on waste concentration adds additional confusion to an already burdensome and convoluted process. It is unclear how these time frames for analyses based on concentration limits should be incorporated into other analyses including site stability, intruder analysis and protective assurance period compliance analyses. As the requirements are not included in the rule, they should be removed from the guidance. [Is this comment referring to Section 2.3.2.4 Site Characteristics, on page 2-25, the A\), B\), and C\)?](#) Please clarify.

[No 11. Section 2.3.5 is noted in your comments.](#)

The table for required analyses based on site characteristics again adds confusion to the burdensome licensing process. It is unclear if the analyses required are dependent upon the waste concentration as prescribed in §2.3.4. We recommend providing additional context for the table and including guidance regarding the site characteristic requirements. [Is this comment referring to Section 2.5.3.1.2.1 Regulatory, p. 2-35, Table 2-1 Analyses Required for Included FEPs Based on 61.50?](#) Please clarify.

[Summary Comment 3.](#)

Time periods for analyses and additional considerations based on waste concentration are introduced in this chapter, including for example those in §2.3.4, that are not included in the rule.

[Is this comment again referring to Section 2.3.2.4 Site Characteristics?](#)

Thanks for your clarifications!

*Priya Yadav, P.E.*

Project Manager

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