

# Public Meeting to discuss status of the ISG on Acute Chemical Exposures and Next Steps

May 19, 2016

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NMSS/FCSE/FMB

# Agenda

- Meeting Purpose
- Update on Acute Chemical Exposure Issue
  - Status on the interim staff guidance
- Path forward
- Audits
  - Audit Plan
  - Timeline
- Next Steps
- Questions/Feedback

# Meeting Purpose

- Provide an update regarding the Acute Chemical Exposures and Quantitative Standards Issue.
- Inform the fuel cycle industry of NRC's path forward on the issue.
- Obtain feedback from the fuel cycle industry and members of the public on staff's path forward and project timeline.

# Interim Staff Guidance (ISG)

- March 4, 2015 and April 17, 2015 FRN requested public comments on ISG and backfit claim.
- July 1, 2015 public comment period closed.
- Public Comments on draft ISG:
  - Comments from NEI (ML15189A076)
  - Comments from two fuel cycle licensees (ML15188A028 and ML15208A098)
  - Two members of the public (ML15189A073 and ML15189A074)
  - Staff resolution of comments (ML15253A694 and ML15295A163)
- ISG was revised to address public comments (ML15253A685).

# Update

- Staff presented ISG to ACRS on October 8, 2015.
  - ACRS recommended publication of ISG (ML15293A314)
- Staff presented revised ISG to CRGR on January 28, 2016.
  - CRGR endorsed ISG on letter dated March 25, 2016 (ML16032A047).
  - Latest version of the ISG (ML16056A301)

# Path forward

- Staff identified the need for additional information to make a safety determination on how licensees are identifying and managing chemical hazards (including dermal/ocular).
- Staff plans on conducting audits to gather information on individual licensee's programs and practices.
- ISG will be used for the review of future major licensing actions (e.g. new applications, 70.64)

# Audits

- Provide the NRC with a better understanding of the chemical safety analyses and chemical safety practices that licensees use to identify and manage chemical hazards.
- Audits will be conducted during a 2-day site visit between the months of June and July, 2016.

# Audit Plan

- Audit Scope:
  - Operations covered by the ISA
  - Evaluation of chemical exposures
  - Proposed standards when necessary
  - Worker protection program
- Information to be reviewed:
  - Sample of chemical safety ISA scenarios
  - Internal and operating procedures
  - Process hazard analyses, HAZOPs, What ifs, etc.
  - Safety controls and worker protection



# Audit Plan (cont'd)

- **Audit Team:**
  - Branch Chief: Robert Johnson
  - Technical Lead: Marilyn Diaz
  - Technical Support: James Hammelman
- **Logistics:**
  - 2 day Site Visit (June – July)
  - Prior to site visit, licensee will receive a formal letter with audit plan specific to their facility.
  - Deliverables: Audit Summary Report

# Project timeline

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- May 19, 2016: Public Meeting
- May 20-27, 2016: Set the dates for site visits
- June 6-10, 2016: Formal letter with audit plan
- June 13-July 29, 2016: Site visits/audits
- July-August 2016: Prepare audit summary reports

# Next Steps

- Schedule site visits with each licensee.
- Gather information through site visits (audits).
- Document NRC observations on audit summary reports.
- The information discussed in these audit summary report may be included, fully or in part, in the development of the NRC technical ISG and related Commission Paper.

# Questions



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