

Regulatory Guide Periodic Review

RG Number: 3.8, Revision 2

Title: Preparation of Environmental Reports for Uranium Mills

Office/Division/Branch: NMSS/DUWP/URLB

Technical Lead: James Webb/Douglas Mandeville

Staff Action Decided: Reviewed with issues identified for future consideration

1. What are the known technical or regulatory issues with the current version of the Regulatory Guide (RG)?

This RG was issued in 1982 to provide specific and detailed guidance for the preparation of environmental reports for uranium mills in order to comply with the NRC regulations in 10 CFR Part 51, "Licensing and Regulatory Policy and Procedures for Environmental Protection."

10 CFR Part 51 was revised in 2014 with a new title, "Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions." As a result, RG 3.8 is not cross-referencing to the correct regulatory citations.

In addition, this RG includes duplicate guidance that is also in RG 3.46, "Standard Format and Content of License Applications, Including Environmental Reports, for In Situ Uranium Solution Mining." Also, draft NUREG-2126, "Standard Review Plan for Conventional Uranium Mill and Heap Leach Facilities — Draft Report for Comment," and NUREG-1569, "Standard Review Plan for In Situ Leach Uranium Extraction License Applications," include information pertaining to the content of both guides.

This RG is referenced in RG 3.63, "Onsite Meteorological Measurement Program for Uranium Recovery Facilities-Data Acquisition and Reporting."

2. What is the impact on internal and external stakeholders of not updating the RG for the known issues, in terms of anticipated numbers of licensing and inspection activities over the next several years?

No technical or regulatory issues were identified. Therefore, there is no impact to internal or external stakeholders resulting from these activities.

3. What is an estimate of the level of effort needed to address identified issues in terms of full-time equivalent (FTE) and contractor resources?

It is estimated that 0.1-0.5 FTE will be needed to consolidate RG 3.8 and RG 3.46. It is possible that contractor resources could also be used to perform this assignment.

4. **Based on the answers to the questions above, what is the staff action for this guide (Reviewed with no issues identified, Reviewed with issues identified for future consideration, Revise, or Withdraw)?**

Reviewed with issues identified for future consideration.

5. **Provide a conceptual plan and timeframe to address the issues identified during the review.**

As discussed in Management Directive (MD) 6.6, "Regulatory Guides," the NRC staff reviews RGs approximately every 5 years to ensure that these guides continue to provide useful guidance. The staff will consider the regulatory citation issues and any other technical information that may need to be updated during the next periodic review of the guide.

NOTE: This review was conducted in September 2016 and reflects the staff's plans as of that date. These plans are tentative and subject to change.