

From: [Cuadrado-Caraballo, Leira](#)
To: [Johnson, Robert](#)
Subject: May 4, 2017 Conference Call Summary: NFS BLEU Complex Decommissioning and Decontamination
Date: Monday, May 15, 2017 9:16:00 AM
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Conference Call Summary: NFS BLEU Complex Decommissioning and Decontamination; License No. SNM-124, Docket 70-143

Date: May 4, 1017

Time: 10:00 – 10:30 am

Participants:

NFS:

Amaryl Morie
Rik Droke
David Hopson
Robert Holley
Ron Rice
Randy Shackelford

Purpose: NFS representatives requested a meeting to discuss the actions and reports required by the NRC in order to remove or reduce the financial assurance instruments for both AREVA and NFS following decommissioning of the buildings and grounds at the Blended Low Enriched Uranium (BLEU) Complex.

Summary of Discussions:

- NFS provided a status on the decommissioning and decontamination activities of the BLEU Complex located in approximately 5 to 6 acres of NFS property.
- Financial assurance for the BLEU complex is currently provided by AREVA and NFS.
- NFS reported they are preparing to dismantle 3 of the 6 buildings compromising the BLEU complex which currently do not have any process equipment as all contaminated equipment has been properly disposed. They are also preparing survey plans to restore land for unrestricted use conditions even though it will not be released.
- NFS indicated they are not planning on using RESRAD modeling, instead they plan to use characterization data to compare with screening values of NUREG-1757 Vol.2 Appendix H.
- NFS indicated they plan to use NUREG-1757 Vol.2 Appendix H to

demonstrate compliance with the dose criteria in Part 20, Subpart E, using a screening approach dose analysis.

[Appendix H provides the surface soil concentrations of individual radionuclides that would be deemed in compliance with the 25 mrem/y (0.25 mSv/y) unrestricted use dose limit in 10 CFR 20.1402.

Regulations in 10 CFR 20.1402 requires doses from residual radioactivity to not exceed 25/mrem per year and residual radioactivity levels to be As Low as Reasonably Achievable (ALARA). Licensees use this guidance in preparing decommissioning plans, license termination plans, final status surveys, and other technical decommissioning reports for NRC submittal.]

- NFS would like to ultimately remove or reduce the financial assurance instruments currently in place after they can demonstrate this area is suitable for unrestricted use.
- NFS will consider sharing the draft survey plans with the NRC technical experts in the near future. NRC staff stated that it would confirm, in writing, whether it found the approach acceptable if it was allowed to review the survey plan.
- NRC communicated NFS always have the option of submitting to the NRC for review their final determination that this area meets the unrestricted use criteria. If the NRC concludes the area is suitable for unrestricted use, NRC findings could be referenced as part of the justification for eliminating or reducing the financial assurance instruments when submitted to the NRC for review and approval.
- NRC indicated any changes to the licensee Decommissioning Cost Estimate and Financial Assurance instruments need to be properly justified and approved by the NRC.