

# Section 4 Ponds License Amendment Request Status Update

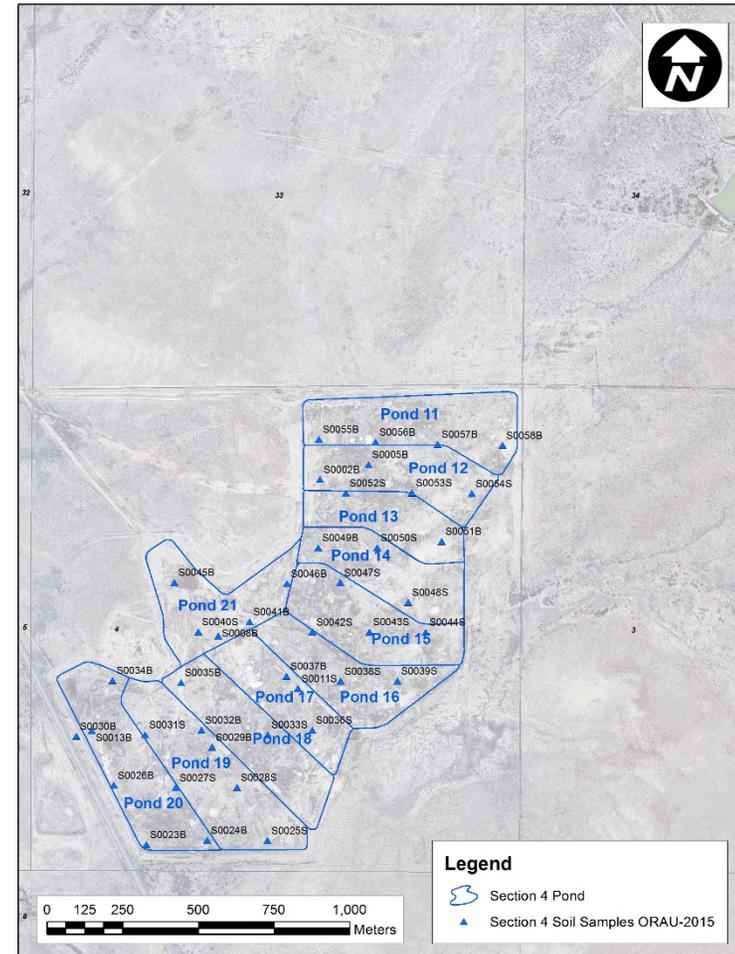
Rio Algom Mining, LLC  
Radioactive Materials License SUA-1473  
Category 1 Public Meeting  
June 16, 2017



# Section 4 Pond Overview

## Status

- An alternate approach to the Soil Decommissioning Plan (SDP) for Section 4 Pond decommissioning was first presented to NRC on April 20, 2016 and includes:
  - Dose modeling (RESRAD version 7.0) using parameters in the SDP (Komex, 2005)
  - Incorporates the long-lived radionuclide concentrations reported by ORAU in 2015 – median soil concentration values
  - Doses below radium-226 benchmark dose of 18 mrem per year
  - Doses below the 25 mrem per year decommissioning standard, which is not applicable to uranium recovery licensees.



# Section 4 Pond Overview

## Status

- A Request for Termination of Section 4 Ponds from License submitted on August 16, 2016 (ML16242A301).
- NRC provided a follow-up to this request via an email dated November 9, 2016 and recommended the document be re-submitted
- NRC suggested the submittal should be in the form of a license amendment request and include the following:
  1. A copy of the current SUA-1473 license with markings indicating the changes that are being requested as part of the license amendment process. Specifically, the NRC staff is suggesting that License Condition 32 be amended to include the date of a newly approved SDP.
  2. An updated SDP for SUA-1473
    - › The submittal should include a copy of the current SDP marked-up to remove all references to Section 4.
    - › The submittal should also include a clean copy of the SDP with the references to Section 4 removed.

# Section 4 Pond Overview

## Status (*Continuation from previous slide*)

3. A discussion on the applicable criteria for Section 4 as outlined in the current SDP referenced in License Condition 32.
  - This discussion should include how the criteria in the SDP for Section 4 are being met in order to release Section 4 as is being requested by the licensee.
  - This discussion should also include any alternatives that are being used rather than the criteria outlined in the SDP.
4. Model the median and the mean survey value data as was previously discussed
5. All documents are “Final” not “Draft”
6. A discussion of whether or not your current sampling methods deviate from any and all applicable procedures. Specifically discussing why it is acceptable to use the data provided by the ORAU soil sampling that was completed in 2015.

# Section 4 Pond Overview

## Status

- In response to the November 9, 2016 email, RAML submitted a license amendment request to license condition 32 of SUA-1473 on December 6, 2016. This submittal included:
  - A copy of the SDP (KOMEX, 2006) marked-up to remove all references to Section 4 Pond.
  - A clean copy of the SDP (KOMEX, 2006) with the references to Section 4 Ponds removed.
  - A discussion of the alternative for Section 4 ponds that is being used rather than the criteria outlined in the current SDP.
  - Model results using the median and the mean radionuclide soil concentrations.
  - The word “Draft” was removed from the dose assessment document.
  - A discussion of why the ORAU data are acceptable to use in lieu of data collected pursuant to the SDP.

# Section 4 Pond Overview

## Status

- On December 19, 2016 NRC indicated to RAML via phone call that the December 2016 submittal was not complete. The proposed path forward was:
  - NRC could reject or RAML could withdraw submittal.
  - NRC would provide RAML with other license amendment requests they have approved to help RAML develop very specific information typical of a license amendment request.
  - RAML needs to submit a copy of the current SUA-1473 license with markings indicating the changes that are being requested as part of the license amendment process.
- On January 13, 2017, RAML formally withdraws the August 16, 2016 and December 6, 2016 submittals related to the Section 4 ponds.

# Section 4 Pond Overview

## Topics for Discussion:

- Proposed edits to the license conditions to reflect release of Section 4 Ponds.
- Clarifying the Soil Decommissioning Plan version that should be edited to remove reference to Section 4 Ponds:
  - January 2005 version referenced in LC32 or
  - May 2006 updates the January 2005 version to include RAML responses to NRC RAIs as referenced in LC32.
- RAML has received from NRC typical license amendment request language from other licensees that the NRC viewed as acceptable.
- RAML would like to resubmit the license amendment request as soon as possible and would like any feedback from the NRC to avoid an incomplete submittal.

# Questions and Discussions

