

Enclosure 2 to LC-2018-0075

Replacement License Amendment Request  
and Revised License Condition Pages

(3 pages)

The following license condition to be added to the LACBWR possession only license:

2.C (5) License Termination Plan (LTP)

Solutions shall implement and maintain in effect all provisions of the approved License Termination Plan, as approved in License Amendment No. xxx subject to and as amended by the following stipulations:

Solutions may make changes to the LTP without prior approval provided the proposed changes do not meet any of the following criteria:

- (A) Require Commission approval pursuant to 10 CFR 50.59.
- (B) Result in significant environmental impacts not previously reviewed.
- (C) Detract or negate the reasonable assurance that adequate funds will be available for decommissioning.
- (D) Decrease a survey unit area classification (i.e., impacted to not impacted; Class 1 to Class 2; Class 2 to Class 3; or Class 1 to Class 3) without providing the NRC a minimum 14 day notification prior to implementing the change in classification.
- (E) Increase the derived concentration guideline levels (DCGL) and related minimum detectable concentrations (for both scan and fixed measurement methods).
- (F) Increase the radioactivity level, relative to the applicable DCGL, at which an investigation occurs.
- (G) Change the statistical test applied other than the Sign test.
- (H) Increase the probability of making a Type I decision error above the level stated in the LTP.
- (I) Change the approach used to demonstrate compliance with the dose criteria (e.g., change from demonstrating compliance using DCGLs to demonstrating compliance using a dose assessment that is based on final concentration data).
- (J) Change parameter values or pathway dose conversion used to calculate the dose, such that the resultant dose is lower than in the approved LTP and if a dose assessment is being used to demonstrate compliance with the dose criteria.

## 2.0 DESCRIPTION OF PROPOSED CHANGES

Solutions proposes to amend the license to include a provision to allow Solutions to make changes to the approved LTP without prior NRC approval, similar to the flexibility afforded to licensees in making changes to the facilities or procedures, as described in the SAR or equivalent (D-Plan/PSDAR).

The change method includes ten change criteria elements. Thus, Solutions proposes to amend the LACBWR possession only license to incorporate a new license condition, License Condition 2.C (5) as follows:

### 2. C (5) License Termination Plan (LTP)

Solutions shall implement and maintain in effect all provisions of the approved License Termination Plan, as approved in License Amendment No. xxx subject to and as amended by the following stipulations:

Solutions may make changes to the LTP without prior approval provided the proposed changes do not meet any of the following criteria:

- (A) Require Commission approval pursuant to 10 CFR 50.59.
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- (I) Change the approach used to demonstrate compliance with the dose criteria (e.g., change from demonstrating compliance using DCGLs to demonstrating compliance using a dose assessment that is based on final concentration data).

- (J) Change parameter values or pathway dose conversion used to calculate the dose, such that the resultant dose is lower than in the approved LTP and if a dose assessment is being used to demonstrate compliance with the dose criteria.