
INSPECTION PROCEDURE 87104

DECOMMISSIONING INSPECTION PROCEDURE FOR MATERIALS LICENSEES

PROGRAM APPLICABILITY: IMC 2602, IMC 2641, IMC 2800

87104-01 INSPECTION OBJECTIVES

01.01 To determine if licensed decommissioning activities are being conducted in a manner that will protect the health and safety of workers and the general public.

01.02 To determine if licensed decommissioning programs are being conducted in accordance with U.S. Nuclear Regulatory Commission requirements.

01.03 To provide inspection requirements and guidance for facilities needing a significant decommissioning effort and where licensee submittal of a decommissioning plan (DP) for NRC approval may be required.

87104-02 INSPECTION REQUIREMENTS

A review of the licensed activities will be commensurate with the scope of and the risks associated with the licensee's program. A determination regarding safety and compliance with NRC requirements will be based on direct observation of work activities, interviews with workers, demonstrations by workers performing tasks regulated by NRC, and independent measurements of radiation conditions at the facility, in addition to a review of licensee records.

All decommissioning activities performed by the licensee and its contractors should be considered for inspection. Inspection findings for contractor activities conducted under the site operator's license and supervision shall be documented against the site operator's program. Inspection findings for contractor activities conducted under the contractor's license and supervision shall be documented against the contractor's program. If it is unclear what radiation safety program governs a contractor activity, that activity shall be viewed as falling under the site operator's license and supervision.

In discussing issues with the licensee and reviewing records, cover the period back to the last inspection. Older records or issues preceding the last inspection should be reviewed if warranted by circumstances such as a history of incidents, non-compliance, or high radiation exposures.

The inspection program should be tailored to each specific licensee. Most materials licensees will not require submittal of a formal DP for NRC review and approval. Some materials licensees, such as medical teletherapists, well loggers, and radiographers, will not require any actual decontamination or dismantlement of facilities. For this type of licensee and licensees requiring limited decontamination, the inspector may use Inspection Procedure (IP) 83890 for the closeout inspection.

An increased level of NRC inspector oversight is needed for licensees that may require extensive remediation and a detailed final survey, such as manufacturers of radiochemicals and certain academic and research institutions. For these licensees, apply the requirements and guidance in this IP, including the field notes in Appendices A and B.

02.01 Applicable Inspection Requirements from the Operational Program. The inspector should review all inspection procedures that were applicable to the licensee's operational program, and select those portions that carry over to the licensee's decommissioning program. The inspector should develop an inspection plan that will focus on the adequacy of routine activities that can significantly affect the health and safety of workers and the public and the environment around the licensee's facility. Refer to Inspection Manual Chapter (IMC) 2800 and the IP 87100 series for materials licensees.

Some of the most important inspection elements should include: security and control of contaminated material; radiation protection for workers; radwaste generation, storage, transportation, and disposal; effluent releases and environmental monitoring; management organization and controls; occupational safety and health; essential systems and services to support decommissioning; and final survey.

In addition to the inspection activities described above, the inspector should also use other parts of the NRC Inspection Manual that are routinely used on typical inspections and which are included in IMC 2800 and the IP 87100 series of IPs.

02.02 Inspection of Key Decommissioning Activities. The inspector should develop an inspection plan to observe key decommissioning activities being performed by the licensee and its contractors. Key decommissioning activities occur in all phases of the decommissioning process. Key decommissioning activities for facilities requiring a significant decommissioning effort, such as building remediation and dismantlement, soil removal, and groundwater remediation, are identified below.

- a. Inspections before Dismantlement. This is the decommissioning planning stage after the shutdown of operations and before dismantlement and remediation. Key activities and conditions may include: verification that the DP has been reviewed and approved (if required); identification and demarcation of areas in operation and areas undergoing decommissioning, where only part of a facility is being decommissioned; removal of licensed materials from the facility (if required by license condition); verification that security and control of contaminated material are in compliance with 10 CFR 20.1801 and 20.1802; compliance with decommissioning timeliness requirements; compliance with recordkeeping requirements for decommissioning; implementation of the licensee's decommissioning organization; site characterization; and construction of site features to support decommissioning.
- b. Inspections during Dismantlement and Remediation. This is the stage when the site is actively being decommissioned. Key activities include: maintenance of security and control of contaminated material; decontamination and dismantlement of structures; remediation of soil, sediment, surface waters, and groundwater; survey measurements and analytical methods, waste management and on-site storage; transportation and

offsite disposal of wastes; on-site disposal of waste; restoration of the site; and inspection activities identified during the license review of the licensee's DP. Inspectors should consider the use of in-process inspections. In-process inspections have been shown to be more efficient than one-time confirmatory surveys. In-process inspections allow NRC to take side-by-side measurements, collect water and soil samples, and address survey issues early in the decommissioning process.

- c. Inspections After Remediation. Key activities in this stage include: licensee final survey; NRC confirmatory survey; and confirming final site status.

87104-03 INSPECTION GUIDANCE

General

Observations of licensee decommissioning activities in progress, equipment in use, facilities and use areas, and the implementation of specific license conditions and approved DPs and procedures will be primary indicators of the quality of the licensee's overall radiation safety program.

Review of licensee records related to decommissioning will also contribute to the evaluation of the licensee's program. In reviewing records, look for trends - such as increasing doses, effluent releases, or groundwater contamination - that may indicate areas of potential concern. Records of surveys, waste disposal, effluent release, receipt and transfer of radioactive materials, training, instrument calibrations, source checks, quality assurance/quality control audits, use logs, and air sampling may be examined randomly until the inspector is satisfied that the records are being maintained and are complete. Other records that are more closely related to health and safety, such as personnel dose-monitoring records and incident reports, should be examined in greater detail.

The planning and field conduct of an inspection should be coordinated with the NRC Licensing Project Manager, the regional inspection staff manager, and other regulatory agencies involved in the licensed facility. See Section 05.05 of IMC 2602 and IP 93001 for further guidance.

Many of the inspection activities required during decommissioning are similar to inspection activities conducted at operating facilities. The guidance given in this section, therefore, includes references to other sections of the NRC Inspection Manual that are applicable to materials decommissioning. The inspector should refer to IMC 2602 for general policies and guidance for decommissioning inspections.

A major part of inspection activities will be related to evaluating the licensee's final survey program for release of the site under NRC regulations. For facilities that will require a final survey, the inspector should begin this activity early in the decommissioning process, starting during site characterization, to ensure that the site will be remediated in accordance with NRC requirements and the licensee's approved DP. Confirmatory surveys, by the inspector or an NRC contractor, may be necessary. Inspectors should consider the use of in-process inspections. In-process inspections have been shown to be more efficient than one-time confirmatory surveys. In-process inspections allow NRC to take side-by-side measurements, collect water and soil samples, and address survey issues early in the decommissioning process. The extent of the confirmatory surveys will depend on the inspector's and the Licensing Project Manager's confidence in the quality of the licensee's final survey program. The licensing Project Manager (PM), in consultation with the inspector, will review each proposed retirement of expired, superseded, or terminated license to determine the necessity of

performing a confirmatory survey. The review will be on a case-by-case basis and guided by the following criteria as described in IP 83890.

- a. Those facilities that meet the following criteria do not require a confirmatory survey:
 1. An adequate closeout survey has been conducted by the licensee.
 2. Use has been limited to small quantities of radionuclides with half-lives of 120 days or less.
 3. The use of sealed sources only (if leak tests have been $<0.005 \mu\text{Ci}$).
 4. The use of limited materials that pose a very low risk to public health and safety.
- b. Those facilities that meet the following criteria do require a confirmatory survey:
 1. Partial site release where in-process inspection is not practical.
 2. Repetitive Violations.
 3. Significant lack of Public or Congressional confidence with clean-up efforts at the site.
 4. Significant unresolved weaknesses identified during the inspection of the licensee's final survey program.

03.01 Applicable Inspection Requirements from the Operational Program. Many inspection activities will follow directly from those used during the licensee's operational program. Review the licensee's DP and supporting documents for licensee activities that are similar to those that were performed as part of the operational program. Develop the inspection plan to carry over to decommissioning the applicable inspection activities used during the operational phase of the licensee's program. Tailor the inspection plan to meet licensee-specific conditions. See IMC 2800 and the IPs listed therein for the materials safety inspection program.

Some of the operational program's inspection requirements that carry over to decommissioning of licensed activities are described below:

- a. Security and Control of Contaminated Material. Security and control of radioactive material at the site shall be maintained, per 10 CFR 20.1801 and 20.1802. Confirm that licensee security and control of contaminated material are in compliance with the DP throughout the decommissioning process. Verify that the posting requirements of 10 CFR 20.1902 are met for any contaminated material. Containers of contaminated materials shall be labeled in accordance with 10 CFR 20.1904 and 20.1905. Contaminated materials in buildings should be secured and controlled by the licensee in such a manner as to prevent unauthorized access or theft of radioactive material.

In some situations, especially for materials licensees, the only way to prevent unauthorized access or theft is to lock all access points to the material. However, mechanisms needed to prevent access are usually dependent upon the nature of the situation at the licensee's facility, such as the physical layout of the facility and the movement patterns of people within that facility. Other possibilities for securing against unauthorized removal include having a person present who could prevent such removal of material. The need to lock access to the licensed material must be determined on a

case-by-case basis, after reviewing the details of the licensee's decommissioning program.

At sites undergoing decommissioning, contaminated materials in outside areas may be secured and controlled by fencing (different types, depending on facility location and human populations around the facility, for example), soil covers, or other means. Three- to 4-foot-thick soil covers over contaminated soil, slag, or tailing piles are generally acceptable.

Access to buildings, rooms, or indoor and outdoor areas where contaminated materials are present shall be limited only to individuals having the licensee's permission for access. See IP 83822, "Radiation Protection," and applicable sections of 87100 series IPs.

- b. Radiation Protection for Workers. Inspect the licensee's approved health physics procedures, as implemented in the field, to determine that the approved program is being implemented and to establish the degree of potential for exposures. Tailor subsequent inspections to concentrate on identified areas of risk. See IP 83822, "Radiation Protection."
- c. Effluent Releases/Environmental Monitoring. Verify that licensee offsite monitoring and sampling locations and frequencies are sufficient to demonstrate that the effluent limits in Appendix B of 10 CFR 20 are being met. The potential for offsite release may be lower during decommissioning than during operations, but inspections for offsite releases should continue to be performed during decommissioning. Verify instrument calibrations are being performed as required. See IP 84750, "Radioactive Waste Treatment, and Effluent and Environmental Monitoring."
- d. Management Organization and Controls. Review licensee implementation of approved plans and programs, regulatory requirements, and license conditions for the management and control of decommissioning of the facility, including: the licensee organization in place for the decommissioning project; designation and qualification of the radiation safety officer; the QA program and annual review; records control and storage; internal review and audit; safety committee; procedure control for cleanup operations; and the decommissioning procedures to be implemented.
- e. Essential Systems and Services to Support Decommissioning. Verify, through observations in the facility and review of licensee records, that the support systems needed for cleanup and dismantlement efforts are functional. These systems include: electrical power; heating, ventilation, and air conditioning systems; water supply; in-plant communications systems; liquid and solid contaminated waste systems; and in-plant lighting.
- f. Occupational Health and Safety. Decommissioning activities often involve work practices, such as deep excavating and dismantlement of buildings, that present non-radiological safety hazards. NRC inspectors, although not OSHA inspectors, should be aware of, and identify to both the licensee and OSHA (through the regional OSHA liaison), non-radiological health and safety issues that are caused by licensee decommissioning activities. See IMC 1007, "Interfacing Activities between Regional Offices of NRC and OSHA," and the corresponding Memorandum of Understanding between NRC and OSHA.
- g. Documentation of Inspections. Fully document - by the fieldnotes in this IP, the fieldnotes in the applicable 87104 IP for the licensee's operational program, or, if

necessary for complex sites, a written report - all visits to and inspections of each site undergoing decommissioning. Radioactive materials at the site present potential health and safety hazards until the site is remediated and the license is terminated. See IMC 0610, "Inspection Reports."

03.02 Inspection of Key Decommissioning Activities. Identify all significant or key licensee activities of a particular site undergoing decommissioning, including before, during, and after remediation. Develop an inspection plan to focus on activities where potential health and safety problems may occur, especially accounting for high-risk activities. The frequency of inspections should be based on the particular set of decommissioning activities to be performed by the licensee. Typical key decommissioning activities are given below. Complete the checklist of key decommissioning activities in Appendix A as part of your inspection report.

a. Inspections before Dismantlement

1. Facility Conditions. Verify that all requirements preceding actual facility remediation are in place, including: the DP has been reviewed and approved (if required); licensed material used during operations has been removed from the site (if required by license condition); specific license conditions pertaining to the planning and preparation stage of decommissioning have been put in place by the licensee; and essential systems and services to support decommissioning activities are in place.
2. Timeliness Requirements. Verify that decommissioning schedules are consistent with decommissioning timeliness requirements in 10 CFR 30.36, 40.42, and 70.38, or that the licensee has submitted an alternative decommissioning schedule for NRC approval.
3. Recordkeeping. Verify that recordkeeping for information important to the safe and effective decommissioning of the facility is consistent with the recordkeeping requirements in 10 CFR 30.35, 40.36, and 70.25.
4. Financial Assurance. Verify that the financial assurance requirements, including financial instruments, are being maintained in accordance with 10 CFR 30.35, 40.36, and 70.25.
5. Site Characterization. Verify that site characterization activities are being conducted in accordance with all applicable radiation protection procedures. The inspector may want to conduct an inspection with the licensee (or licensee's representative) while the licensee is performing characterization. Where possible and warranted, conduct side-by-side measurements with the licensee and take independent measurements for comparison with licensee results. Under special circumstances, the inspector should split samples with the licensee during site characterization, where necessary, to confirm the adequacy and validity of licensee measurements. Evaluate how the results of the planned site characterization will lead to successful site remediation and the licensee's final survey.

The inspector should request that the licensee review all available historical records of material use, safety event reports, aerial photographs of the site, as-built facility drawings or blueprints, etc., to aid in the identification of activities that may have resulted in contamination at the site. Interviews with employees and former employees may also be useful to identify previous activities and former locations where licensed material was used or disposed.

6. Construction of Site Features to Support Decommissioning. Verify that the construction of new loading docks, roads, rail spurs, drainage ditches, U.S. Environmental Protection Agency (EPA) storm water management units, and other features to support decommissioning, are in accordance with NRC-approved DPs (if required) and do not compromise health and safety considerations of workers and the public.
 7. Other License Conditions and Approved Plans. Verify that licensee activities conform to specific license conditions, the approved DP, and licensee programs and procedures. Audit licensee performance on high-risk activities, as needed.
 8. Resource Conservation and Recovery Act (RCRA) Facilities. The inspector should be aware of any ongoing U.S. EPA-mandated RCRA facility investigations required by EPA's Hazardous and Solid Waste Amendments permit to identify potential releases to soil and surface water.
- b. Inspections during Dismantlement and Remediation
1. Decontamination and Dismantlement of Structures. Verify, by field observation and record reviews, that licensee activities to decontaminate and dismantle structures are being performed in accordance with NRC-approved plans. If a decommissioning plan is not required, verify that the remediation activities are being performed in accordance with applicable NRC regulations and guidance. Structures include buildings, above- and below-ground utilities, treatment lagoons, and other man-made structures used or affected by the licensee.
 2. Decontamination and Remediation of Soil, Sediment, Surface Waters, and Groundwater. Verify, by field observation and reviews of licensee records, that decontamination and remediation of soil, sediment, surface waters, and groundwater are being performed in accordance with NRC-approved plans. If a decommissioning plan is not required, verify that the remediation activities are being performed in accordance with applicable NRC regulations and guidance. Inspect licensee activities on-site and inspect off-site areas that may have been contaminated by licensee operations.
 3. Radioactive Waste Management. Confirm that the licensee is maintaining adequate waste management controls related to the release and disposal of liquid, airborne, and solid wastes. Radioactive wastes generated during decommissioning must be disposed of in a manner approved by NRC. Some of the radioactive wastes generated during decommissioning include: building materials; process and facility equipment; concrete rubble; filters, trash, and sludge; material from the waste treatment lagoons; soil and vegetation; groundwater; and surface water. See IP 84850, "Radioactive Waste Management - Inspection of Waste Generator Requirements of 10 CFR 20 and 10 CFR 61."
 4. Low-Level Radioactive Waste Storage. During decommissioning, large quantities of low-level waste may be temporarily stored on-site before shipment to a licensed disposal facility. Confirm that the waste is stored in accordance with license conditions and the guidance in IP 84900, "Low-Level Radioactive Waste Storage."

5. Transportation of Wastes. Review the specifics of the licensee's packaging and transportation activities to determine which elements of the following IPs will be used during the inspection: IP 86740, "Inspection of Transportation Activities," and IP 84850, "Radioactive Waste Management - Inspection of Waste Generator Requirements of 10 CFR 20 and 10 CFR 61." For facilities that have large amounts of contaminated materials to ship offsite, transportation of material may continue throughout the decommissioning process. Contaminated materials for off-site disposal must be packaged in accordance with Department of Transportation regulations published in 40 CFR Parts 171-178 and NRC regulations published in 10 CFR Part 71. NRC Regulatory Guide 7.1 provides guidance for packaging and transporting radioactive materials.
 6. Restoration of Site. Verify that the licensee has restored the site to meet license conditions and specifications in NRC-approved plans.
 7. Activities Identified during Review of Decommissioning Plan. Plan to inspect any other significant activities or conditions that may have been specified in the licensee's DP or license.
- c. Inspections after Remediation
1. Certification of Waste Disposal. Verify that the licensee has submitted NRC Form 314 or equivalent information regarding the disposition of all licensed material in accordance with 10 CFR 30.36, 40.42, and 70.38.
 2. Licensee Final Survey Program. There are many elements of the licensee's final survey program that need to be inspected. This inspection should occur while the licensee is in the process of performing the final survey program. The purpose of the "in-process" final survey inspection is to provide confidence that the licensee's survey results are accurate and representative of the conditions at the facility. See Appendix B, "Final Survey Program Inspection Field Notes," for a detailed checklist of inspection items for the licensee's final survey program. See IP 83890, "Closeout Inspection and Survey," for closeout procedures.
 3. Confirmatory Survey. It may be necessary for NRC, or an NRC contractor, to conduct confirmatory measurements to provide supplemental information, in addition to the findings of the in-process inspection, to ensure that the survey results reported by the licensee are accurate and representative of the conditions at the facility. However, comprehensive confirmatory surveys should only be necessary if there is significant doubt regarding the licensee's final survey results. For example, a confirmatory survey would be needed if an in-process inspection of the licensee's final survey program identifies multiple weaknesses or if a licensee has a history of violations that reduces the NRC's confidence in the survey results.

The inspector may perform limited measurements (split samples, "side-by-side" direct measurements, etc.) as a part of the in-process inspection of a licensee's ongoing final survey program. The scope and number of these measurements should be significantly less than that performed during a "traditional" confirmatory survey performed after the licensee has completed the final survey. In-process inspections will be most effective for medium to large sites. For small sites, it may not be practical to perform an in-process inspection, because the final survey will likely be relatively informal and may only take a few days to complete. In this case, the inspector's close-out inspection would be performed after the

licensee has completed the survey and submitted the final survey report. However, the inspection of small sites should still include a review of the licensee's program to the extent practical, augmented by a limited confirmatory survey by NRC staff.

If it is determined that an NRC contractor should be used to perform independent verification surveys, the inspector should discuss with the project manager to obtain agreement. The inspector and project manager should obtain agreement from their respective Branch Chiefs. Upon agreement, the project manager will develop a Request for Technical Assistance (RFTA) for approval by the Branch Chief to obtain the contractor services. The NRC Contracting Officer Representative (COR) will direct the contractor to obtain the requested services in accordance with the NRC Contract. The contractor will develop a survey plan for inspector and project manager approval for use during the inspection.

4. Site Maintenance for Restricted Use. If the site is to be released for restricted use, verify that all conditions limiting use of the site conform to license conditions and NRC-approved plans and are in place and functional.
5. Conditions for Release for Unrestricted Use. Verify that the licensee has met all applicable conditions for release of the site for unrestricted use.

87104-04 INSPECTION RESOURCES

The direct on-site inspection hours required to complete this inspection are dependent upon: (1) the licensee's decommissioning activities being inspected; (2) the standard materials health and safety inspection areas covered in the inspection; (3) the overall complexity of decommissioning the facility; and (4) the duration of the licensee's decommissioning program. For facilities needing a significant decommissioning effort, it is estimated that approximately 10 to 40 inspection hours will be needed to complete each inspection of a key decommissioning activity or standard health and safety area from the operational program.

END

Appendices:

- A. "Materials Decommissioning Inspection Field Notes for Facilities Needing Significant Decommissioning Effort"
- B. "Final Survey Program Inspection Field Notes"

APPENDIX A

MATERIALS DECOMMISSIONING INSPECTION FIELD NOTES
FOR FACILITIES NEEDING SIGNIFICANT DECOMMISSIONING EFFORT

Region _____
Inspection Report No. _____ License No. _____
Docket No. _____
Licensee (Name & Address) _____

Licensee Contact _____
Telephone No. _____
Last Amendment No. _____ Date of Amendment _____
Program Code _____
Date of Last Inspection _____
Date of This Inspection _____
Date of Next Inspection _____

Type of Inspection: Announced Unannounced
 Routine Special
 Initial Decomm. Reinspection of Decomm.

Level of Inspection: Normal Reduced Extended

Brief Description of Inspection Activities:

Brief Description of Findings and Action:

Summary of Findings and Action:

- No violations cited, clear NRC Form 591 or regional letter issued
- Violation(s), clear NRC Form 591 issued
- Violation(s), regional letter issued
- Followup on previous violations

Inspector: _____ Date _____
(Signature)

Approved: _____ Date _____

[Field notes are to be used by the inspector to assist with the performance of the inspection. Note that all areas indicated in the field notes are not required to be addressed during each inspection. However, for those areas not covered during the inspection, a notation ("Not Reviewed") should be made in each section where applicable. Additionally, all areas covered during the inspection should be documented in sufficient detail to describe what activities and/or records the inspector observed. The fieldnotes to the "Decommissioning Inspection Procedure for Materials Licensees" should be supplemented with: (1) the applicable inspection procedures for operating facilities provided in the Inspection Procedure (IP) 87100 series; and (2) other written documentation of the inspection, as necessary.]

1. SUMMARY OF DECOMMISSIONING STATUS

The checklist below is intended to provide, in a written outline format, summary documentation of the status of the licensee's facility in the decommissioning process. This documentation will be filed as part of the inspection report. The inspector should use this information to develop each inspection plan(s) for the various stages of decommissioning, namely, before dismantlement, during dismantlement and site remediation, and after site remediation.

- | | |
|--|---|
| A. Licensee ceased operational program. | <input type="checkbox"/> Y <input type="checkbox"/> N |
| B. Required decommissioning financial assurance mechanisms in place. | <input type="checkbox"/> Y <input type="checkbox"/> N |
| C. Decommissioning Plan (DP) required. | <input type="checkbox"/> Y <input type="checkbox"/> N |
| D. Licensee final survey required. | <input type="checkbox"/> Y <input type="checkbox"/> N |
| E. NRC confirmatory survey required. | <input type="checkbox"/> Y <input type="checkbox"/> N |
| F. NRC closeout inspection required. | <input type="checkbox"/> Y <input type="checkbox"/> N |
| G. Licensee doing decommissioning planning and preparation before dismantlement. | <input type="checkbox"/> Y <input type="checkbox"/> N |
| H. Licensee actively remediating site. | <input type="checkbox"/> Y <input type="checkbox"/> N |
| I. Licensee completed site remediation. | <input type="checkbox"/> Y <input type="checkbox"/> N |

Description of Facility Status:

2. INSPECTION OF KEY DECOMMISSIONING ACTIVITIES

The following is a generic checklist of major licensee activities occurring at various stages of decommissioning. From this generic checklist and from facility-specific activities you identify, develop the set of licensee activities to be inspected - for each individual inspection throughout the decommissioning process. Plan to inspect licensee activities that present potential high-risk conditions. Then apply the standard health and safety inspection areas in Section 3 of these fieldnotes (taken from the applicable 87100 series IP for the licensee's operational program) to the specific licensee decommissioning activities that are being inspected.

To complete the licensee activities checklist, the inspector will need to obtain information from the Licensing Project Manager, review the DP, make observations at the licensee's facility, review licensee records, take measurements and samples of contaminants, and undertake other investigative measures, to determine whether the licensee is meeting all regulatory and DP commitments for each decommissioning activity the licensee is performing.

A. LICENSEE ACTIVITIES INSPECTED BEFORE DISMANTLEMENT

- | | | | |
|-----|--|----------------------------|----------------------------|
| 1. | SNM inventory cleanout/off-site removal of licensed material used in operations has been performed by licensee. | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| 2. | Facility license conditions are in place and met by licensee. | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| 3. | Site security and control of contaminated material being maintained in compliance with 10 CFR 20.1801 and 20.1802. | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| 4. | Support systems and services (e.g., lighting, water supply) are in place. | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| 5. | Decommissioning schedules are consistent with timeliness requirements in 10 CFR 30.36, 40.42, and 70.38. | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| 6. | Licensee's recordkeeping is consistent with 10 CFR 30.35, 40.36, and 70.25. | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| 7. | Financial assurance requirements are being maintained in accordance with 10 CFR 30.35, 40.36, and 70.25. | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| 8. | Licensee is conducting site characterization in accordance with applicable radiation protection procedures. | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| 9. | Construction of new site features (e.g., roads, rail spurs, staging areas, sediment control ponds) conforms to DP and does not compromise health and safety of workers and public. | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| 10. | Licensee activities conform to specific license conditions and licensee programs and procedures. | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| 11. | Other licensee activities | <input type="checkbox"/> Y | <input type="checkbox"/> N |

Basis for Findings:

- B. LICENSEE ACTIVITIES INSPECTED DURING DECONTAMINATION, DISMANTLEMENT, AND SITE REMEDIATION
1. Site security and control of contaminated material being maintained in compliance with 10 CFR 20.1801 and 20.1802. () Y () N
 2. Decontamination and dismantlement of structures are being performed consistent with DP and sound industry practice (structures include buildings, utilities, treatment lagoons, etc.). () Y () N
 3. Decontamination and remediation of the following are being performed consistent with DP and sound industry practice: () Y () N
 - a. Soil. () Y () N
 - b. Sediment. () Y () N
 - c. Surface waters. () Y () N
 - d. Groundwater. () Y () N
 - e. Other mediums: () Y () N
 4. Licensee release and disposal of decommissioning wastes are consistent with DP and approved by NRC for:
 - a. Liquid wastes (e.g., groundwater, surface water, liquid from treatment ponds, process liquids). () Y () N
 - b. Solid wastes (e.g., building materials, process and other facility equipment, concrete rubble, soil). () Y () N
 - c. Other wastes: () Y () N
 5. Temporary, onsite storage of low-level radioactive wastes from decommissioning meets license conditions and guidance in IP 84890. () Y () N
 6. Packaging and shipment of radioactive waste materials meet requirements in 40 CFR Parts 171-178 and 10 CFR Part 71. () Y () N
 7. Restoration of Site - Licensee has restored site to meet license conditions and NRC-approved plans () Y () N
 8. Licensee survey of material and equipment for free release sufficient to demonstrate compliance with release criteria. () Y () N
 9. Other licensee activities. () Y () N

Basis for Findings:

C. LICENSEE ACTIVITIES INSPECTED AFTER COMPLETION OF SITE REMEDIATION

- | | | | |
|----|--|----------------------------|----------------------------|
| 1. | Licensee has submitted NRC Form 314 for disposition of licensed material in accordance with 10 CFR 30.36, 40.42, and 70.38. | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| 2. | Licensee's final survey program is acceptable (see Appendix B for inspection items for final surveys). | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| 3. | NRC confirmatory survey performed | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| 4. | Site maintenance activities (if any, for restricted use) conform to license conditions and NRC-approved plans and are in place and functional. | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| 5. | Other licensee activities: | <input type="checkbox"/> Y | <input type="checkbox"/> N |

Basis for Findings:

3. INSPECTION OF STANDARD HEALTH AND SAFETY AREAS FROM THE OPERATIONAL INSPECTION PROGRAM

Identify the standard inspection areas (from the inspection program of the licensee's operational program) to be covered during each decommissioning inspection. [Inspection areas A through L below correspond to the typical inspection areas in the 87100 series IPs that are applicable to decommissioning.] Then identify the new activities within the standard inspection areas undertaken by the licensee during decommissioning. Some of the new activities given below, as well as any other activities the inspector identifies, should be considered inspection items under the general set of health and safety inspection areas used in the applicable 87100 series IP.

Minimum inspection areas for the initial decommissioning inspection: decommissioning organization; decommissioning activities in compliance with NRC-approved DP; licensee procedures for implementing the DP; Radiation Safety Committee (RSC) and Radiation Safety Officer (RSO) responsibilities; and the licensee's decommissioning training program.

A. GENERAL OVERVIEW

1. Describe the licensee's decommissioning organizational structure:
 - a. Licensee is performing decommissioning activities in compliance with its approved decommissioning plan. Y N
 - b. Licensee has implementing procedures for the decommissioning activities identified in the DP. Y N
 - c. The RSC and RSO fulfill license requirements to deal with all decommissioning activities. Y N

Basis for Findings:

B. FACILITIES

1. Describe, from field observation, the licensee-identified facilities and outdoor areas to be decommissioned:
2. The licensee's remediation plan includes all the contaminated facilities and areas on-site and off-site. Y N
3. All essential systems and services (e.g., electrical power, water supply, communications systems) are in place and functional for the planned decommissioning activities. Y N
4. Licensee's emergency plan is in place and operative for the duration of decommissioning. Y N
5. For complex sites needing site characterization, describe the key site characterization activities to be performed by the licensee to determine the nature and extent of contamination:
6. Licensee's characterization activities performed in conformance with good industry practice. Y N

Basis for Findings:

C. EQUIPMENT AND INSTRUMENTATION

1. Survey instruments are applicable to contaminants of interest. Y N
2. Use of survey instruments appropriate for site. Y N

Basis for Findings:

D. MATERIALS

1. Radioactive materials licensed during operations have been removed offsite; residual quantities conform to license conditions. Y N
2. Security and control of licensed materials, including contaminated areas, is being maintained. Y N

Basis for Findings:

E. TRAINING

1. Licensee has developed training program for new decommissioning activities (e.g., demolition of structures, excavation of soil); program is adequate. Y N
2. Training program being effectively implemented. Y N

Basis for Findings:

F. AREA RADIATION SURVEYS AND CONTAMINATION CONTROL

1. Area surveys are being performed in areas being decommissioned. Y N
2. Where active remediation (e.g., demolition of structures, excavation of soil) is being performed, radiation levels in unrestricted areas do not exceed 2 mrem in any one hour. Y N

Basis for Findings:

G. RADIATION PROTECTION

1. The licensee's approved health physics program is being implemented in the field for new decommissioning activities. Y N
2. Site security and control of contaminated material are in compliance with 10 CFR 20.1801 and 20.1802. Y N

Basis for Findings:

H. RADIOACTIVE WASTE MANAGEMENT/EFFLUENTS/ENVIRONMENTAL MONITORING

1. Offsite disposal of decommissioning wastes conforms to free release criteria and disposal site requirements. Y N
2. All new effluent releases conform to DP and applicable regulations. Y N
3. The licensee's environmental monitoring program is being implemented in conformance with the DP and all applicable limits are being met. Y N
4. Temporary storage/staging areas for radioactive wastes from building demolition, equipment dismantlement, soil excavation, etc., are adequately posted and protected. Y N

Basis for Findings:

I. RECORDKEEPING FOR DECOMMISSIONING

1. Copies of the licensee's decommissioning costs estimates and funding methods are on file. Y N
2. Licensee has adequate records for decommissioning activities performed (e.g., for decontamination and dismantlement of structures; decontamination and remediation of soil, sediment, surface waters, groundwater, surveys of remediated facilities facilities). Y N
3. Licensee's financial assurance conforms with the financial assurance requirements of NRC-approved possession limits and NRC regulations. Y N

Basis for Findings:

J. TRANSPORTATION

1. Describe the licensee's program to package and ship decommissioning waste materials:

2. Licensee's program meets all applicable 10 CFR and 49 CFR requirements for marking labeling, placarding, and shipping paper requirements for radioactive waste shipments. Y N

Basis for Findings:

K. POSING AND LABELING

1. All contaminated areas, waste processing areas, and waste handling areas are posted in conformance with regulations. Y N

2. Packaged radioactive waste materials are labeled in accordance with regulations. Y N

Basis for Findings:

L. OCCUPATIONAL HEALTH AND SAFETY

1. Describe the occupational health and safety observations made at the licensee's facilities:

2. Licensee and Occupational Safety and Health Administration were informed of occupational health and safety issues observed during the inspection. Y N

Basis for Findings:

4. VIOLATIONS, NON-CITED VIOLATIONS, FOLLOWUP ITEMS, AND OTHER ISSUES

Briefly state (1) the requirements and (2) how and when the licensee violated the requirement. For non-cited violations, indicate why the violation was not cited. Briefly describe followup items and other issues.

END

APPENDIX B

FINAL SURVEY PROGRAM INSPECTION FIELD NOTES

1. STATUS OF LICENSEE FINAL SURVEY

- A. Final survey report submitted to the NRC. Y N
- B. Previous inspection(s) of licensee final survey program conducted. Y N
- C. Final survey report not submitted, licensee final survey in progress. Y N
- D. Final survey plan submitted and approved by NRC license reviewer. Y N

Basis for Findings:

2. INSPECTION AREAS FOR LICENSEE FINAL SURVEYS

Notes:

(1) For facilities where an approved decommissioning plan (DP) is required, inspections should be made against commitments in the DP and the licensee's final survey plan (which would have been approved by the NRC license reviewer during license review). For facilities where a DP is not required, inspections should be made against NRC regulations, and license conditions.

(2) For facilities that require a significant decommissioning effort, all the inspection areas listed below should be inspected while the licensee's final survey program is in progress. For small, licensed facilities that do not require a significant decommissioning effort, only some of the inspection areas below may apply, and it may not be practicable to inspect these areas until after the licensee's final survey is completed and the licensee's final survey report has been submitted to NRC.

(3) Inspection of a licensee's final survey may include independent confirmatory measurements by the inspector or NRC contractor. The extent of the confirmatory measurements, and whether the use of an NRC contractor is warranted, depends on a number factors that are discussed in Section 2.C. In most cases, minimal confirmatory surveys should be sufficient.

(4) The inspector should identify which inspection areas listed below are performed during each inspection.

A. SITE CONDITIONS AT TIME OF LICENSEE FINAL SURVEY

- 1. Site has been decontaminated/remediated in accordance with DP or site procedures. Y N

Basis for Findings:

B. LICENSEE FINAL SURVEY PLANS AND PROCEDURES

1. Contaminants:

- a. Licensee has identified all potential contaminants. Y N
- b. Licensee has specified acceptable release criteria. Y N
- c. Licensee has clearly documented the basis for any alternate criteria, if applicable. Y N

2. Organization and Responsibilities:

- a. Survey program documented. Y N
- b. Survey staff responsibilities and qualifications documented. Y N

3. Quality Assurance/Quality Control:

- a. Organization Y N
- b. QA Program Y N
- c. Operational Procedures Y N
- d. Document Control/Records Management Y N
- e. Equipment Maintenance and Control Y N
- f. Audits and Corrective Action Y N
- g. Independent third party measurement QC Y N

4. Laboratory analytical procedures, including QA/QC, acceptable, and results adequately documented. Y N

5. Field Survey Instrumentation:

- a. Survey instrumentation is appropriate for contaminants of interest and site conditions. Y N
- b. Licensee has properly calibrated survey instrumentation. Y N
- c. Instrument operational procedures adequate. Y N

Basis for Findings:

6. Licensee is performing the survey in conformance with the approved survey plan:

- a. All potentially contaminated locations on-site and off-site have been properly classified as "impacted" or "non-impacted" areas. Y N
- b. "Survey Units" have been properly selected. Y N
- c. Background determination acceptable. Y N
- d. Number and location of measurements and samples in

- | | | | |
|----|---|----------------------------|----------------------------|
| | each "survey unit" is acceptable. | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| e. | Surface scan procedures and percent coverage acceptable. | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| f. | Surface activity measurement procedures acceptable. | | |
| | (1) Direct. | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| | (2) Removable. | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| g. | Exposure rate measurement procedures acceptable. | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| h. | Surveying and sampling of the following media conducted as appropriate: | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| | (1) Soil and sediment, surface and subsurface. | | |
| | (2) Groundwater | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| | (3) Surface water. | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| | (4) Buildings, interiors and exteriors. | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| | (5) Equipment and systems. | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| | (6) Grounds. | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| | (7) Other media: | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| | | <input type="checkbox"/> Y | <input type="checkbox"/> N |

Basis for Findings:

7. Licensee's Final Survey report sufficient to demonstrate that release criteria have been met.

Note: The final survey report will, in general, not be available for review at the time of an "in-process" inspection of a final survey program. However, at the end of the survey project, after the final survey report has been submitted, the inspector should ensure that these areas have been reviewed by either the license reviewer or project manager. If questions remain as to whether these areas have been satisfied by the licensee, or the final survey report has not been reviewed, the areas listed below should be addressed during the inspection.

- | | | | |
|----|---|----------------------------|----------------------------|
| a. | Survey results demonstrate, with 95% confidence, that average residual contamination in each "survey unit" is less than release criteria. | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| b. | Survey results demonstrate that the hot-pot criteria in NUREG-1575, Rev. 1 have been satisfied. | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| c. | Elevated survey results investigated by licensee. | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| d. | "Survey Units" reclassified, as necessary, based on survey results. | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| e. | Reclassified "survey units" surveyed with proper number and location of samples and proper percentage of the surface scanned. | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| f. | Survey report provides sufficient documentation of procedures and QA/QC. | <input type="checkbox"/> Y | <input type="checkbox"/> N |
| g. | Survey report provides diagrams or other documentation identifying survey locations. | <input type="checkbox"/> Y | <input type="checkbox"/> N |

Basis for Findings:

Note: Some licensees are performing their final survey using NUREG/CR-5849. NUREG-1575 Rev. 1 should not be applied to these licensees.

C. NRC CONFIRMATION SURVEY

1. Evaluate whether a confirmatory survey is justified.
 - a. Significant, unresolved, weakness identified during the inspection of the licensee's final survey program. Y N
 - b. Repetitive violations. Y N
 - c. Significant public or Congressional interest. Y N
 - d. Small site where an in-process inspection not practical. Y N

2. If a confirmatory survey is justified, determine if an NRC contractor should be used. Meeting on e or more of the three criteria listed below will, in general, justify the use of a contractor.
 - a. Licensee's final survey involves unique or complex technical issues.
 - b. Confirmatory survey is expected to require more than a man-week effort to complete field surveys and sampling. Y N
 - c. Confirmatory survey is very high priority that cannot be completed by NRC staff in a timely manner. Y N

END

Revision History for IP 87104

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
	1996	Issued	None	N/A
	06/04/97 CN 02-029	Revised for clarification	None	N/A
	ML022120634 07/29/02 CN 02-029	Revised for clarification	None	N/A
N/A	ML19064B360 10/09/19 CN 19-033	Minor edits to clarify confirmatory survey requirements and provide consistency with IP83890 "Closeout Inspection and Survey." Changes made in Section 3, "General," and Section 3.2.c., "Inspections after Remediation," bullet 3.	None	ML19204A111