



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

May 30, 2019

Bryan C. Bower, Director
West Valley Demonstration Project
U.S. Department of Energy
10282 Rock Springs Road
West Valley, NY 14171-9799

**SUBJECT: U.S. DEPARTMENT OF ENERGY WEST VALLEY DEMONSTRATION
PROJECT MAIN PLANT PROCESS BUILDING DECOMMISSIONING &
DEMOLITION PLAN, WVDP-586, REVISION 1, DATED SEPTEMBER 27, 2017
(DOCKET NO. 05000201 (POOM-032))**

Dear Mr. Bower:

On April 8, 2019 (Agencywide Document Access and Management System [ADAMS] Accession No. ML19150A092), U.S. Department of Energy West Valley Demonstration Project (DOE-WVDP) informed the U.S. Nuclear Regulatory Commission (NRC) staff that DOE-WVDP is moving forward with the demolition of the above grade portion of Main Plant Process Building (MPPB) and indicated that given that the project is no longer on hold, requested that NRC resume its review of DOE-WVDP's responses to NRC's comments (ADAMS Accession No. ML17270A119) on the MPPB Decontamination and Demolition Plan (ADAMS Accession No. ML17090A299).

The NRC has no further comments on the subject document and the DOE-WVDP's responses to the NRC comments on the subject document. The NRC understands that the WVDP MPPB Decommissioning and Demolition Plan (Plan) will be finalized and a copy will be provided to the NRC.

The Plan indicates through characterization, source term reduction, controls, modeling calculations, and specific decontamination and demolition (D&D) approaches, techniques, sequencing, and environmental conditions that the open-air demolition can be performed safely (i.e., within dose limits). As discussed on page 10 of the Plan, DOE-WVDP states that

“The specific D&D approaches, techniques, work sequencing and schedule are based on currently available information and planning and lessons learned from demolition of the O1-14 Building. Demolition of the O1-14 Building was conducted first as a proof of concept for safe and compliant open air demolition of a radiological building. Demolition of the Vitrification Facility will follow, and lessons learned from those activities will be incorporated into the planning for MPPB demolition.”

Given that the Vitrification Building was a more contaminated building than the O1-14 Building, and the Plan is silent to the specific lessons learned from the recent Vitrification Building Demolition, the NRC requests that DOE-WVDP meet with the staff during one or more NRC monitoring visit(s) before open air demolition begins to summarize the status of the MPPB structure with regards to how it meets the prescribed limits for open air demolition, to review the lessons learned from the Vitrification Building Demolition open air demolition and how they were

or will be applied to the MPPB work instruction packages (WIP) or work documents. Also, the NRC requests that DOE-WVDP provide a radionuclide inventory of the MPPB once it is demolition ready.

In addition, as discussed on page 60 of the Plan, DOE-WVDP states that”

“Air dispersion modeling using the CAP88 (Clean Air Act Assessment Package) and AERMOD (Atmospheric Dispersion Modeling) programs is being performed to show that residual radiation levels within the MPPB are low enough to perform open air demolition while insuring potential doses to the workers and the public remain well below established standards.”

Also, on page 7-18 of the WVDP Phase 1 Decommissioning Plan, Revision 2, DOE-WVDP indicates that on the basis of characterization results, it will verify that the Process Building can be demolished without exceeding the National Emissions Standards for Hazardous Air Pollutants (NESHAP) limits (Title 40 of the *Code of Federal Register* Part 61), making use of the CAP88-PC code and considering other sources of airborne radioactivity emissions during the calendar year in which the demolition will be accomplished. NRC requests a copy of these analyses and supporting data that verifies that open air demolition remains feasible.

In accordance with Title 10 of the *Code of Federal Register* Part 2.390 of the NRC’s “Agency Rules of Practice and Procedure,” a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC’s ADAMS. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions or need any additional information regarding our comments, please contact me at 301-415-6822.

Sincerely,

/RA/

Amy Snyder, Senior Project Manager
Materials Decommissioning Branch
Division of Decommissioning, Uranium Recovery
and Waste Programs
Office of Nuclear Material Safety
and Safeguards

cc: P. J. Bembia, NYSERDA

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