



CHAIRMAN

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

August 14, 1989

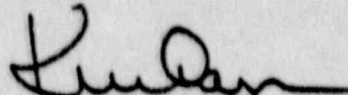
MEMORANDUM FOR: James M. Taylor
Acting Executive Director for Operations

FROM: Kenneth M. Carr

SUBJECT: ACTION ITEMS RESULTING FROM THE SYNAR HEARING
ON DECOMMISSIONING

Attached is a list of staff action items resulting from the recent Synar hearing. About one-third of these commitments were included in our testimony, and the rest were discussed at the hearing or during my meetings with the staff.

Please ensure that these commitments are factored into our response to the GAO report RCED-89-119, "Nuclear Regulation: NRC's Decommissioning Procedures and Criteria Need to be Strengthened".


Kenneth M. Carr

cc: Commissioner Roberts
 Commissioner Rogers
 Commissioner Curtiss
SECY
OGC
GPA

EDO---004665

ACTION ITEMS FROM SYNAR HEARING ON DECOMMISSIONING

1. Develop Commission policy on BRC by December 1989 (Preparation and Hearing: COM and RES).
2. Interim guidance on residual radioactivity standards for decommissioning actions by December 1989 (Testimony: RES); develop final standards within 2 - 2½ years (Preparation: RES).
3. Require licensees to list in one document all land, buildings, and equipment involved in licensed operations (Testimony: NMSS and NRR).
4. Revise existing guidance to clarify the scope and rigor of verification surveys conducted to ensure that licensees decontaminate facilities in accordance with NRC's guidelines (Testimony: NMSS and RES).
5. Reconsider Health Physics Society's standards for residual radioactivity if revised to respond to NRC's concerns (Testimony: RES).
6. Require licensee monitoring of buried waste sites, as appropriate, and determine what remedial measures, including removal of such waste offsite, are appropriate at time of license termination (Testimony: NMSS).
7. Submit program to Commission for decommissioning records retention (Testimony: NMSS and ARM).
8. Ensure that sites are decontaminated in accordance with NRC's guidance prior to terminating the license and releasing all or part of a site (Testimony: NMSS and NRR).
9. Review sites terminated since 1965, including review of NRC records to identify sites, contacting licensees to supplement inadequate NRC records, and visiting sites to build a record when the existing record is inadequate (Testimony: NMSS).
10. Review and comment on GAO's report and provide responses to GAO and the Subcommittee (Testimony: NMSS).
11. Complete review of renewal application and preparation of environmental assessment for B&W Apollo by September 1989 (Preparation: NMSS).
12. Complete review of renewal application and preparation of environmental assessment for B&W Parks Township in early 1990 (Preparation: NMSS).
13. Require groundwater monitoring at B&W Apollo and Parks Township facilities (Preparation: NMSS).

14. Look into requiring licensees to inform NRC of follow-up surveys and decommissioning after license termination (Hearing: NMSS).
15. Know extent of groundwater contamination at Kerr-McGee Cimmaron before terminating license and releasing the site (Hearing: NMSS).
16. Consider requiring licensees to meet more stringent standards developed by EPA after a license has been terminated based upon NRC's interim standard (Hearing: NMSS and OGC).
17. Provide number of onsite burials since 1981 to the Subcommittee (Hearing: NMSS and NRR).
18. Conduct contractor surveys at GUNC, Pawling, New York and Kerr-McGee, Cushing, Oklahoma to determine extent and significance of contamination (Hearing: NMSS).
19. Compel cleanup action at West Lake Landfill (Hearing and Preparation: NMSS and OGC).
20. Consider adding a "reopener" clause to license termination decisions to require additional decontamination if subsequent information indicates additional contamination (Hearing: NMSS and OGC).
21. Explain why 3 out of the 19 facilities reviewed by GAO did not need to submit decommissioning plans (Preparation: NMSS).
22. Find out whether NRC sponsored the ORNL study cited on Page 15 of the GAO report (Preparation: NMSS).

Commitments made in preparation for and during the Synar hearing on August 3, 1989, as well as in NRC's testimony submitted for the record.