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ADVANCED NUCLEAR FUELS CORPORATION

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SAFETY, SECURITY, AND LICENSING

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CWM:89:097

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U.S. Nuclear Regulatory Commission
Attn: Mr. David L. Meyer, Chief
Office of Administration
Division of Freedom of Information &
Publications Services
Regulatory Publications Branch
Washington, DC 20555

Dear Mr. Meyer:

Subject: DRAFT REGULATORY GUIDE, "RECORDS IMPORTANT FOR DECOMMISSIONING FOR LICENSEES UNDER 10CFR PARTS 30, 40, 70 AND 72"

Advanced Nuclear Fuels Corporation (ANF) has reviewed the draft Regulatory Guide on records important for decommissioning which was received for comment on August 14, 1989. Our comments are given below.

ANF is a fabricator and supplier of light water reactor fuel and related services. We are engaged in the processing of low enriched uranium in our fuel fabrication plant, and in supplying reactor services. Two classes of radionuclides are of concern for the future decommissioning of our facility. These are low enriched uranium and mixed fission and activation products with low enriched uranium being the principal radionuclide family processed throughout the plant processing areas. Small quantities of mixed fission and activation products are present at a separate building. These radionuclides are associated with the tools used at reactor fuel storage pools.

Our comments are concerned mainly with the content of the records which we believe should be retained for decommissioning a low enriched uranium fuel fabrication plant. We believe a low enriched uranium fabrication plant with its high degree of accessibility and general lack of penetrating radiation constitutes a special case for decommissioning.

Based on our actual experience in decommissioning our mixed oxide facility and centrifuge enrichment test facility, it is believed that we could decommission the uranium process buildings by removing all processing equipment, duct work, and process piping, and removing and/or decontaminating any contaminated areas on the floor, wall, and ceiling. Consequently, it is necessary only to maintain "as-built" drawings of nonvisible equipment and piping. Visible equipment and accessible areas where the status of the area for decommissioning can be accurately determined by visual inspection, and careful surveys would not require the retention of as-built drawings.

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However, according to paragraph 3.2 of the draft Regulatory Guide and 10 CFR 70.25(g)(2), decommissioning records are to include as-built drawings and modifications of structures and equipment in restricted areas (any area to which access is controlled to protect individuals from exposure to radiation or radioactive materials). If drawings are not available, appropriate records of available information concerning those areas may be substituted. Thus, a licensee would need to either maintain as-built drawings for all restricted areas, or if those were not available, appropriate records of available information concerning those areas may be substituted.

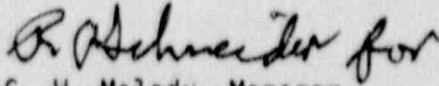
We believe that the draft Guide can be strengthened by expanding the last part of paragraph 3.2 to explain what is meant by "appropriate records of available information" and what those records must include to be acceptable to the NRC. Based on our previous discussions, we suggest that an expansion of paragraph 3.2 include a statement similar to, "For restricted areas accessible to entry for visual inspection, survey, decontamination, and disassembly of equipment, and where dose rates are <5 mrem/hr, the only as-built drawings necessary are those which show nonvisible equipment (buried piping, floor drains, wall ducts, etc.)."

It would also be helpful to clarify the intent and meaning of paragraph 3.2.7. It is not clear how the natural radioactivity of the soil and building materials is to enter into the determination of the acceptable decommissioning of a facility. Presumably, the determination of acceptability is to be based on absolute values of radioactivity or dosage (e.g., dpm, pCi/g, mrems, etc.), not the difference between natural radioactivity and that contributed by the licensee.

The meaning of isotopic analysis of building materials in paragraph 3.2.7 is also not clear.

We appreciate this opportunity to comment on the draft Regulatory Guide.

Very truly yours,


C. W. Malody, Manager
Regulatory Compliance

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