

8:00 AM Monday - Key Stone

1/6/93

Gene--

Happy New Year! Just a reminder about two meetings--

1. NRC-EPA meeting on January 8, 1993, 9:15 to 4:00, NRC Headquarters, White Flint, Room 8-B-11

This meeting has two components. The first part will be a continuation of the discussion on the "underpinnings" for the site cleanup rulemakings. The second part will focus on the Rulemaking Issues Paper for our enhanced participatory rulemaking. My original intent for this second component was to make sure that NRC and EPA staff don't have any serious misunderstandings on the material in the Rulemaking Issues Paper. We now have a draft workshop agenda (enclosed) which will hopefully foster effective and manageable workshop discussions of the material in the Rulemaking Issues Paper. Perhaps the best way to see if we have the same understandings on the Rulemaking Issues Paper is by discussing the draft agenda. This will also be a major item for discussion at the workshop preparatory session on the 11th and 12th (see below). I would anticipate that we will devote the majority of the time to the "underpinnings" discussion and then use whatever time we have left to review the draft workshop agenda. Is there anything else that you would like on the agenda for the meeting on the 8th?

2. Workshop preparatory meeting, NRC and EPA staff, January 11 and 12, 1993.

We will be meeting in the Pennsylvania Room at the Holiday Inn in Bethesda, MD, 8120 Wisconsin Avenue, from 8:30 to 5:00pm. The facilitators from the Keystone Center will be here to assist us in our efforts. The objectives of this preparatory session are:

- o to review the draft agenda for the workshops
- o to "preview" the NRC presentations that will be made at the workshops
- o to anticipate the types of questions that the various participants may raise at the workshops and to discuss possible responses to these questions (note: although we will devote time to the discussion of what types of comments to anticipate from the various interests represented, we will not be developing this information through "role playing.")
- o to identify any region-specific information that we should be aware of in preparation for the workshops
- o to familiarize NRC and EPA staff with the workshop groundrules and dynamics

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- o generally, to ensure that we are prepared to handle any of the logistical, substantive or process issues that may arise in connection with the workshops

I have enclosed a draft workshop agenda and a list of questions that we can anticipate being raised at the workshops. I'll look forward to seeing you on Friday, or at the Monday meeting. Call me at 301-504-1642 if you have any questions. Thanks again for your help on this.

Chip

Chip Cameron

cc: Don Cook
Mike Weber

NRC SITE CLEANUP CRITERIA WORKSHOP
Draft Agenda
January 6, 1993

Day 1

9:00 Coffee

9:30 Welcome and Background

Enhanced Participatory Rulemaking and the Establishment of Site Cleanup Criteria -- Chip Cameron, NRC

- What is the Enhanced Participatory Rulemaking Process and why has NRC selected it?
- Why does NRC want to develop cleanup criteria?

9:50 Workshop Format -- Michael Lesnick, Barbara Stinson and Connie Lewis, The Keystone Center

- What are the goals and objectives?
- What is the agenda?
- What are the groundrules for conducting the workshop and what is the role of the facilitators?

10:00 Participant Introductions

- Name, affiliation, and location
- Two important issues for discussion in the workshop

10:45 Break

11:00 Brief Review of the Issues Paper and International Standards -- Don Cool, NRC

- What are the issues?
- What decommissioning approaches are other countries using?

11:30 Decommissioning Process and Case Studies -- Michael Weber, NRC

- What is decommissioning?
- What practical lessons has NRC learned?

12:00 Break

12:15 Working Lunch Introductory Discussion

- The Rulemaking Issues Paper identifies four possible fundamental objectives which could serve as the basis for a regulatory approach to site cleanup standards. In terms of the alternative regulatory approaches reflected in the four fundamental objectives, what are the relative advantages and disadvantages of developing and using generic site cleanup standards as opposed to using site-specific approaches?

1:15 Cross-Cutting Issues Discussion - A discussion of the cross-cutting issues that can be used to compare and contrast the alternative regulatory approaches for developing cleanup standards

- To what extent do the alternative regulatory approaches protect human health and the environment?
 - What population(s) should be protected, in what locations, and over what timeframe? What are the relative merits of each alternative regulatory approach?
 - What level(s) is sufficient to ensure protection of population(s)? What are the relative merits of each alternative regulatory approach in terms of achieving this level?
 - Should human standards be used to protect natural systems?

3:00 Public comment

3:15 Break

3:30 Cross-Cutting Issues Discussion (Continued)

- How should cost and other practical considerations be considered in selecting a regulatory approach for the standards?
 - What are the cost and practical considerations that relate to each of the alternative regulatory approaches?
 - What weight should be given to these considerations in selecting a regulatory approach?
 - How do each of the alternative regulatory approaches affect the types and distributions of costs and benefits?
 - If a cost-benefit approach is used, what costs and benefits should be considered? Should individual or population (or both) doses be considered? If costs are balanced against dose averted, what value should be used in evaluating the ratio (e.g., \$1000 per person-rem)?

5:15 Public comment

5:30 Summary and Adjournment

Day 2

8:00 Coffee

3:30 Cross-Cutting Issues Discussion (Continued)

- What technologies are necessary and available for use of each of the alternative regulatory approaches?
 - What capabilities would be needed to implement the standards (e.g., remediation, modelling, site characterization, regulatory review, licensee demonstration, monitoring)?
 - Are they currently available? Are they expected and, if so, when?
 - To what extent do the technologies transfer the hazard to another medium or other populations? Is the net benefit positive (e.g., producing a smaller volume of hazardous waste to reduce a larger volume radioactive waste)?

10:00 Public comment

10:15 Break

10:30 Cross-Cutting Issues Discussion (Continued)

- To what extent are the alternative regulatory approaches compatible with existing regulatory structures?
 - Do they need to be compatible? What are the advantages and disadvantages?
 - To what extent do the alternative regulatory approaches achieve long-term, regulatory stability?
 - Does each alternative regulatory approach promote regulatory compliance? Does each provide sufficient incentives for timely and effective decommissioning?
 - How easily can the alternative regulatory approach be integrated with the existing nuclear regulatory framework? other relevant federal and state legislation and regulations?

12:00 Public Comment

12:15 Break

12:30 Working Lunch - Cross-Cutting Issues Discussion (Continued)

- What are the waste management implications of each alternative regulatory approach?
 - How do each of the alternative regulatory approaches relate to the quantity and types of wastes produced? Is sufficient capacity available or expected to be available?
 - To what extent does each alternative regulatory approach merely transfer the risk to another population?
 - How should each alternative regulatory approach apply to future waste disposals under 10 CFR 20.304 and 302?
 - To what extent does each alternative regulatory approach address other options for waste management, including recycling and reuse?

2:15 Public Comment

2:30 Break

2:45 Other Key Issues (Remainder of issues not already covered)

- Should the standards consider the effects of radon releases? If so, how should this be done?
- Should criteria be established for protecting specific pathways or resources (e.g., groundwater)?
- Will there be cases where release for "unrestricted use" may not be feasible? How should these situations be addressed?

3:45 Public Comment

4:00 Summary of Workshop Issues

4:30 Adjourn

SITE CLEANUP WORKSHOPS-ANTICIPATED QUESTIONS TO NRC STAFF

- o What is the relationship of the site cleanup rulemaking to the BRC Policy/Isn't this an attempt to sneak through a BRC Policy?
- o What are the implications of the BRC provision in the National Energy Policy Act for the site cleanup rulemaking?
- o How and when will the NRC address the issues of the disposal of waste and the recycle of radioactive material from site cleanup efforts?
- o How and when will the issue of state compatibility in the site cleanup area be addressed?
- o What is the EPA-NRC risk harmonization program and what are the implications for the site cleanup rulemaking?
- o How will the public be involved in efforts to establish the compliance methodologies, models, environmental impact statements, and other actions that are necessary supplements to the rulemaking?
- o Will the NRC develop a draft text of the proposed rule for participant review? Will the draft proposed rule that is submitted to the Commission for review be provided to workshop participants?
- o Why isn't the EPA developing these rules?
- o In what way, if any, will these rules be applicable to DOE sites?

how likely is it that the level will be different?



*Enhanced Participatory Rulemaking
on Radiological Criteria for Decommissioning*

Decommissioning

- Definition and Process
 - Practical Aspects and Issues
-

Michael Weber
U.S. Nuclear Regulatory Commission
Enhanced Participatory Rulemaking Workshops
1993

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Decommissioning

Definition

Process for safely removing a nuclear facility from service and reducing residual radioactivity to a level that permits release of unrestricted use and termination of license¹

removal from license

¹As defined in NRC's 1988 Decommissioning Rule

Decommissioning

Existing NRC Requirements

1988 Decommissioning Rule covered:

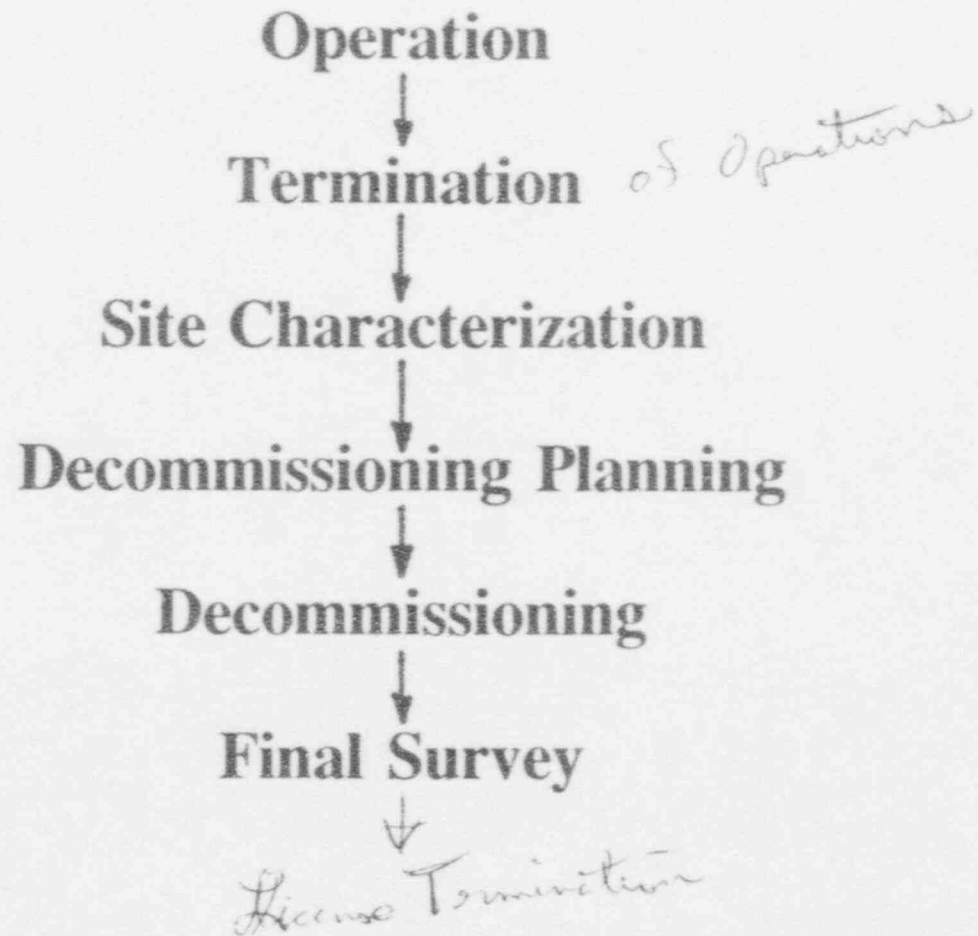
- **Planning**
- **Alternatives (for Reactors)**
- **Financial Assurance**
- **Recordkeeping**
- **License Termination Procedures**

BUT NOT...

Radiological Criteria for Decommissioning

Decommissioning

Process



Decommissioning

Case Studies

Name	Location	Facility Type	Principal Radionuclides	Regulatory Status
UNC-Naval Products	Montville, CT	Fuel Facility	High Enriched Uranium	Active NRC License
Kerr-McGee Cimarron	Crescent, OK	Fuel Facility	Low Enriched Uranium, Plutonium	Active NRC License
Pathfinder Atomic Power Plant	Sioux Falls, SD	Research Power Reactor	Activation Products (^{60}Co , ^{63}Ni , ^{55}Fe)	Active NRC License
GTE-Sylvania	Manchester, NH	Materials Facility	Thorium	Terminated NH License
Radium Chemical Company	Woodside, NY	Materials Facility	Radium	Terminated NY License; Superfund Site
BOMARC Missile Accident Site	Ocean County, NJ	Nuclear Weapons Site	Plutonium	Defense Installation Restoration Program

Decommissioning

Case Study Issues

- Translating residual contamination into dose or risk
- Averaging of contaminant concentrations
- Former waste disposal sites
- Termination of multiple licenses
- Time period for dose calculations
- Technical basis for existing criteria
- Phased decommissioning
- Reliance on institutional controls
- Exposure to radon
- Disposal of low-activity waste
- Availability of waste disposal capacity
- Technology
- Licensing ~~Process~~
Process

Decommissioning

Case Studies

- Represent a range of actual decommissioning projects
- Highlight practical issues associated with decommissioning
- Identify lessons learned

Enhanced Participatory Rulemaking
Simulation Workshop
January 11 - 12, 1993

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