

JAN 28 1991

MEMORANDUM FOR: John W. Hickey, Chief  
 Operations Branch  
 Division of Industrial,  
 and Medical Nuclear Safety, NMSS

FROM: Paul H. Lohaus, Chief  
 Low-Level Waste Management Branch  
 Division of Low-Level Waste Management  
 and Decommissioning, NMSS

SUBJECT: RECOMMENDATIONS FROM THE FY1990 NATIONAL PROGRAM REVIEW

The purpose of this memorandum is to provide the Division of Low-Level Waste Management and Decommissioning responses to Regional comments generated during the FY90 National Program Review. We have provided these responses along with the original comments in the enclosure to this letter. If you have questions please contact me or Roy Person of my staff at FTS 492-0575.

ORIGINAL SIGNED BY

Paul H. Lohaus, Chief  
 Low-Level Waste Management Branch  
 Division of Low-Level Waste Management  
 and Decommissioning, NMSS

Enclosure: As stated

LLWM 90-216

Distribution:	Central File#	NMSS r/f	LLWM t/f	LLWM rf
JGreeves	RBangart	PLohaus	RPerson	JAustin
JKennedy	JSurmeier			
PDR YES	<u>X</u> NO	Category: Proprietary ___ or CF Only ___		
ACNW YES	<u>X</u> NO			

SUBJECT ABSTRACT: RECOMMENDATIONS FROM THE FY90 NATIONAL PRG REVIEW

OFC :LLWM\* :LLWM :LLWM  
 NAME:RPerson/es:JKennedy :PLohaus  
 DATE:01/24/91 : 01/24/91 : 01/24/91 :

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OFC :LLWM :LLWM :LLWM :  
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 NAME: RPerson/es: JKennedy : PLOhaus :  
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 DATE: / 24 /91 : / /91 : / /91 :

RESPONSE TO FY90 RECOMMENDATIONS FROM  
NATIONAL PROGRAM REVIEW

COMMENT: (Region I, page II and Region III, page 5-1 and 9-2)  
Further training is needed for dealing with the submittals of financial assurance for decommissioning.

RESPONSE: Low-Level Waste Management has provided the necessary training through conference calls, guidance memoranda and responses to technical assistance requests.

COMMENT: (Region IV, pages 2-3 and 5-2)  
LLWM and URFO should explore the use of rotational assignments, particularly in areas such as groundwater protection.

RESPONSE: In the NPR, the groundwater protection area was identified as an area requiring increased staff interaction. As a result, a greater effort was made to ensure LLWM and URFO staff interaction on groundwater issues. Of particular significance was the efforts leading to the Alternate Concentration Limit (ACL) workshop for DOE and Title II licensees that was held in December. Staff from LLWM and URFO worked with our contractor, Mitre Corporation, and participated in the workshop, which was very successful.

Resource constraints prevented our being able to implement rotational assignments of groundwater hydrologists. URFO now has a second hydrologist on staff and LLUR is actively recruiting hydrology staff; we hope to be able to implement rotational assignments in the future. Additionally, a rotational assignment of the Deputy Director of URFO to LLUR is planned for February.

COMMENT: (Regional IV, page 9-1)  
NMSS should consider what role the Regional Counsel should take on the financial issues of decommissioning.

RESPONSE: The Office of the General Counsel (Mike Finkelstein) has been asked to better define the role of the Regional Counsel in financial issues associated with decommissioning.

COMMENT: (Region V, page 17)  
LLWM and NRR should clarify lines of responsibility on reactor decommissioning activities.

RESPONSE: Lines of responsibility associated with reactor decommissioning was clarified in SECY-88-128 (May 10, 1988).

NOTE TO:

John Surmeier  
John Austin

*Low:*

FROM:

Re: *Bobson*

12/27/90

*See me on this  
John A*

SUBJECT:

RESPONSE TO NRR RECOMMENDATIONS FROM 1990  
PROGRAM REVIEWS (NATIONAL)

This note is to request that you respond to the enclosed recommendations resulting from the 1990 National Program Review conducted in the NRC regional offices. Each of the recommendations contained in the enclosure have been discussed with you or members of your staff individually. I have also provided the applicable Region's original questions excerpted from the last National Program Review Report. Please provide responses to these recommendations by January 15, 1990.

FROM John W. Hickman, IMNS		DATE OF DOCUMENT 10/16/90	DATE RECEIVED 11/5/90	90-218	
TO Paul Lohaus, LLOB/NMSS		TYPE OF DOCUMENT		DATE ANSWERED 11/20/90	
CLASSIFICATION		FILE CODE		DATE ANSWERED 11/20/90	
DESCRIPTION RESPONSE TO NRR RECOMMENDATIONS FROM 1990 PROGRAM REVIEWS (NATIONAL)		ACTION NECESSARY		BY [Signature]	
ENCLOSURES		NO ACTION NECESSARY			
REMARKS Jim - Let's discuss <del>the</del> our approach for handling [unclear]		REFERRED TO	DATE	RECEIVED BY	DATE
		LQHAUS	11/5/90	[Signature]	11/5/90
		Kennedy	11/5		

NRC FORM 328  
(8-89)

CORRESPONDENCE CONTROL

REGULATORY COMMISSION

[Handwritten notes and stamps at the bottom of the page]

Austin 12/27/90

RECOMMENDATIONS FROM FY 1990 NATIONAL PROGRAM REVIEWS

NMSS/LLWD

- ✓ ◦ Further training is needed for dealing with the submittals of financial assurance for decommissioning.  
(Region I, page 11) also (Region III, pages 5-1 and 9-2)
- ✓ ◦ LLW and URFO should explore the use of rotational assignments, particularly in areas such as groundwater protection.  
(Region IV, pages 2-3 and 5-2)
- ✓ ◦ NMSS should consider what role the Regional Counsel should take on the financial issues of decommissioning.  
(Region IV, page 9-1)
- ✓ ◦ LLW and NRR should clarify lines of responsibility on reactor decommissioning activities.  
(Region V, page 17)



The new hires appear to be routinely accompanying senior staff during inspection related activities and plans are in place to have these individuals conduct independent inspections with direct observation by their respective Section Chief. If the audit is deemed favorable by the Section Chief, the individuals will be given "interim authorization" to conduct some independent inspections prior to completing their qualification journal.

The team was unable to review records of the actual training of inspectors and reviewers due to a problem with the computer system in the Region which maintains that information. Therefore, the Region was not able to provide a matrix showing courses attended by each technical staff member. Interviews with the staff indicated that, due to their Section Leaders' heavy workload, their requests for courses are not always processed in a timely manner and they sometimes learn of courses too late to request attendance. The Region should consider the appointment of a Divisional training coordinator who could keep current on course offerings, match courses with staff members through their IDPs, and ensure that administrative procedures are completed so that staff can attend desired courses.

b. Fuel Facility

The fuel cycle inspectors expressed a wish for greater access to training in specialized areas such as criticality. They also indicated that accompanying fuel cycle facility inspections in other regions would broaden their experience and give them a needed opportunity to exchange ideas with the other members of NRC's small group with expertise in this area. It was also recommended that further training be provided for dealing with the submittals of financial assurance for decommissioning due July 27, 1990.

c. Safeguards

The Region I safeguards inspectors attended the Physical Protection System (PPS) courses at Sandia Laboratory. Additionally, Region I provided training to one inspector with his participation on the NMSS Team Inspections.

R - III

## 5 TRAINING

In the area of training, a training plan is developed yearly, which includes 2-3 training courses for each inspector. With few exceptions, the training was completed. Each new inspector is given a qualification journal which contains comprehensive self-study examinations, and checkoffs for inspector accompaniments. This process concludes with an oral board with regional management.

The training program as it relates to providing supplemental and developmental training for seasoned, experienced inspectors was reviewed. Inspectors interviewed indicated that improvements have been made in this area especially over the past several years. The Region is attempting to allow professionals to attend at least one professional development course on an annual basis. Personnel interviewed indicated that they had received developmental training recently, e.g., RERO, professional society meetings, OSHA training. In fact, Region III staff comprises the majority of the class for the December 1989 OSHA training.

Because of the increased attention to fuel cycle facilities and to cleanup of contaminated sites, the Region might derive future benefits by directing part of the training of new inspectors toward these areas.

At least six people will need to be furnished with the transportation training course H-308, all from the Reactor Programs Branch. At the present time, all of the inspectors in the two Materials Inspections Sections have had this training. Several of the license reviewers have also had this training, however it apparently has not been a request. Region III did send 4 materials inspectors to the most recent H-308 course at TTC in October 1989.

The materials licensing staff believe they would benefit from having someone from the Division of Low Level Waste Management and Decommissioning come to Region III when a financial certification plan is received to train licensing



R-III

## 9 RECOMMENDATIONS/SUGGESTIONS

### 9.1 For NMSS:

1. Continue to plan workshops based on interest areas.
2. Consider region based workshops for training of license reviewers.
3. Establish a better notification system to alert regions when a sealed source and device review is completed so that accompanying amendment is quickly acted upon.
4. Provide in region training on actual funding plans when they begin to arrive.
5. Reconsider having inspection staff complete medical quality assurance questionnaires.
6. Develop a new medical preceptor form.
7. Work with the Technical Training Center and the Office of Governmental and Public Affairs to provide more opportunities for new staff to attend basic health physics courses such as at ORAU.
8. Inform Region III when scheduling meetings in NMSS with Region III licensees well in advance of the meeting time.
9. Reassess resources provided for enforcement activities.

### 9.2 For OE:

1. Provide opportunity for region to comment on proposed standard citation list.

R-IV

9 RECOMMENDATIONS/SUGGESTIONS

9.1 For NMSS:

1. Continue support for training courses for inspectors and reviewers and support more frequent offering of courses.
2. Provide additional training and assistance in reviewing the financial aspects of decommissioning. Consider what role the Regional Counsel should take.
3. Control monthly conference calls to focus on truly generic issues.
4. Develop method to include qualitative comments in NMSS review of inspection program as well as numbers.
5. Provide guidance on how much attention to focus on matters considered for OI investigation. Where in the NRC organization is the proper person to determine whether an issue is "a big deal?"
6. Reconsider resource needs for enforcement activities.

9.2 For OE:

1. Provide standard violation formats for notice of violation.
2. Develop a more formal audit program for review of inspection correspondence.

9.3 For Region IV:

1. Consider overhire position(s) in DRSS to avoid under expenditure of budgeted resources.

R-V

## 9 RECOMMENDATIONS/SUGGESTIONS

### a. For NMSS:

1. Discuss the key inspection items NMSS wishes the Region to track at the next Executive Seminar.
2. Clarify the lines of responsibility between NRR and NMSS with respect to reactor decommissioning activities.
3. Consider increased resource needs for enforcement activities.
4. Consider participating in NRR/regional monthly conference calls on safeguards issues.
5. Continue to provide updated reviewer guides, license conditions and model licenses.
6. Continue to study the two-step licensing process for new materials licenses.
7. Consider developing a shutdown inspection module for "possession only" fuel cycle licensees.
8. Update the Service and Training Information System.
9. Consider developing or revising training in areas such as nuclear pharmacy, brachytherapy, quality assurance, and human factors.

### b. For OE:

1. Provide guidance to the Regions on listing uncited violations on Form 591. Specifically, how can we track repeat offenders?
2. Continue monitoring inspection letters to assure appropriateness of violations cited and identification of repeat violations in letters and NOVs.
3. Develop a more formal audit program to give regions feedback on Severity Level IV and V violations.