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

November 3, 1995

Phil Rutherford, Manager
Radiation Protection and
Health Physics Services
Rocketdyne Division
Rockwell International Corporation
6633 Canoga Avenue
Canoga Park, California 91309

Dear Mr. Rutherford:

We have completed our review of your November 10, 1992, submittal in which you responded to NRC comments concerning the Decommissioning Plan for the Rockwell International Hot Laboratory licensed under Special Nuclear Material License SNM-21, Docket 70-25. In earlier NRC correspondence, dated June 9, 1992, we provided 29 comments that addressed areas within your decommissioning plan that we concluded required additional information and further clarification. Information provided in your November 10, 1992, submittal responded to our request. Please review the following additional comments and provide responses, where requested, within the next 60 days.

Comment 24 was generated by comparing current NRC criteria for unrestricted release to information provided in Section 4.0, Final Radiation Survey, of your decommissioning plan. We had stated that criteria in "Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use or Termination of License for Byproduct, Source, or Special Nuclear Material," Policy and Guidance Directive FC 83-23, Division of Industrial and Medical Nuclear Safety, August 1987, should be cited in this section of your decommissioning plan. In your resubmitted plan, you acknowledge and commit to the above-mentioned criteria. However, activity calculations and dose assessment from buried pipe may not be readily or easily measured, and dose measurements and nuclide concentrations associated with contaminated pipe at the site may exceed the cited criteria. Accordingly, we are concerned that piping associated with Building 20 may not be satisfactorily characterized and decontaminated. We request that you address characterization of nuclides in piping at the Hot Lab, and indicate your plans for meeting radiological clean-up requirements, and plans for disposition, involving contaminated piping.

In addition, in your earlier, September 28, 1990, decommissioning plan, you had indicated that "Residual Radioactive Contamination from Decommissioning," NUREG/CR-5512, January 1990, will be utilized to perform pathway analyses and to determine the total effective dose equivalent (TEDE), based on measured levels of contamination. Should you use NUREG/CR-5512 as a basis in performing pathway analyses or TEDE calculations, be advised that a final edition of this publication was completed in September 1992.

Comment 25 was generated to assure that guidance for surveys provided in NUREG/CR-2082, "Monitoring for the Compliance with Decommissioning Termination Survey Criteria," was incorporated into your plan. As you know, we recommend you use the most recent guidance and information concerning radiological surveys, now contained in NUREG/CR-5849, "Manual for Conducting Radiological

Surveys in Support of License Termination," completed in May 1992. Please use NUREG/CR-5849 in your decommissioning activities. If you relied upon information in NUREG/CR-2082 during previous decommissioning activities, we recommend you consider reevaluating some of your earlier data and other information collected during this period, against information contained in NUREG/CR-5849.

Finally, you will need to request an amendment to your license authorizing changes that allow decommissioning activities in accordance with your decommissioning plan. Your previous submittals did not contain a request for such an amendment authorizing decommissioning activities. Although it is no longer necessary to submit an amendment fee with your application, your request will be subject to full cost fee recovery as specified in 10 CFR 170.31, fee Category 14. You will be invoiced for NRC's costs, which include professional staff time and contractual costs expended, at quarterly intervals as stated in 10 CFR 170.12(c)(2).

I may be reached at (301) 415-6721 if you have any questions.

Sincerely,

Richard H. Turtil, Project Manager
Low-Level Waste and Decommissioning
Projects Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

Docket No. 70-0025
License No. SNM-21

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Surveys in Support of License Termination," completed in May 1992. Please use NUREG/CR-5849 in your decommissioning activities. If you relied upon information in NUREG/CR-2082 during previous decommissioning activities, we recommend you consider reevaluating some of your earlier data and other information collected during this period, against information contained in NUREG/CR-5849.

Finally, you will need to request an amendment to your license authorizing changes that allow decommissioning activities in accordance with your decommissioning plan. Neither the $150.00 check previously forwarded to NRC, nor earlier Rocketdyne submittals, contained a request for an amendment to the license to perform decommissioning activities. You are not required to submit additional monies to NRC.

I may be reached at (301) 415-6721 if you have any questions.

Sincerely,

Deleted per discussion w/ GJackson OC

Richard H. Turtil, Project Manager
Low-Level Waste and Decommissioning
Projects Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

Docket No. 70-0025
License No. SNM-21

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ENCLOSURE B TO ROCKWELL LETTER 92RC10344

RESPONSES TO NUCLEAR REGULATORY COMMISSION COMMENTS IN LETTER DATED JUNE 9, 1992

The September 28, 1990 revision of the Decommissioning Plan for Rockwell International Hot Laboratory was submitted to the Nuclear Regulatory Commission (NRC) for approval in September 1990. The NRC reviewed the plan and, in a letter dated June 9, 1992, identified 29 areas where additional information was needed before final approval could be given.

This appendix presents a response to each of the 29 comments enclosed in the NRC letter:

COMMENT NO. 1:

Page 1-1; Section 1.0, General Information

This section should be revised to include a description of the status of the three previously licensed NRC facilities. The description should indicate if a final survey has been conducted, if any of these facilities are currently licensed under the State of California,and if any additional work is required to release these facilities.

RESPONSE:

NRC-Licensed Facilities Under SNM-21

The RIHL decommissioning plan applies only to the one remaining licensed facility covered by the Special Nuclear Material License SNM-21, namely the Rockwell International Hot Laboratory. Other SSFL facilities have previously been on the SNM-21 license and their status is as follows:

Building 055

This building housed the Nuclear Material Development Facility (NMDF) used for fabricating plutonium fuel. The facility was decommissioned in 1986 and a final survey and report issued.

- N704SRR990027, "Final Radiation Survey of the NMDF," 12/19/86.
- AI-DOE-13559, "Nuclear Material Development Facility Decommissioning Final Report," 3/31/87.

Oak Ridge Associated Universities (ORAU) under contract to NRC then performed an independent verification survey in 1987.

- "Confirmatory Radiological Survey of the Nuclear Materials Development Facility (Building 055), Rockwell International, Santa Susana, California." Prepared by the Oak Ridge Associated Universities for the U.S. Nuclear Regulatory Commission's Region V Office (July 1987).

The facility was deleted from the NRC license by Amendment No. 1 dated October 7, 1987. No further NRC action is required.

Building 172

Building 172 is a shielded x-ray cell where manufactured sealed plutonium fuel elements from Building 055 were x-ray inspected. Routine surveys of the facility were conducted during and immediately following termination of x-ray operations. Since the facility never handled unencapsulated nuclear material, no contamination was ever detected. The building was deleted from the license during the August 1982 license renewal. A confirmatory survey of Building 172 will be performed during the final stages of SSFL facilities decommissioning.

Non SNM-21 NRC-Licensed Facilities

The only other facilities at SSFL licensed by the NRC were not on the SNM-21 license but on reactor licenses.

Building 093 (AE-6/L-85)

The AE-6/L-85 reactor was situated in Building 093. Following decommissioning, the facility was surveyed in March 1986.

- N001SRR140087, "Radiation Survey for Release for Unrestricted Use - L-85 (093)," March 6, 1986.

The results of the survey show that Building 093 meets the criteria established by USNRC Regulatory Guide 1.86 and the NRC Dismantling Order, Docket No. 5-375, dated February 22, 1983, for release of facilities for unrestricted use. An independent verification survey was conducted September 30 through October 2, 1986, by Oak Ridge Associated Universities. The facility was released for unrestricted use by the NRC and the license terminated in April 1987. No further NRC action is required.

Building 100 (FCEL)

Building 100 housed the Fast Critical Experiment Laboratory. This facility had a reactor license CX17 (Docket 50/147) and operated between 1960 and 1973. All material associated with the work was removed and the facility decommissioned in 1980. The facility was surveyed by Rocketdyne, and ORAU performed an independent verification survey.

- NRC letter, Docket 50/147, H. E. Book to Energy Systems Group, "NRC Inspection of Rockwell International's FCEL Facility," July 14, 1980.

The NRC's office of Nuclear Reactor Regulation subsequently released the facility for unrestricted use in October 1980. Currently, the facility houses the Radiation Protection and Health Physics Department, including a counting laboratory. The laboratory uses sealed calibration sources, and counts low-level environmental samples for radioactivity. This activity is included in the State of California Radioactive Materials License 0015-70 and Rocketdyne "User Authorization" No. 124. Should these activities terminate in the future, an independent verification survey shall be performed (probably by ORISE) and the facility released from the State License. No NRC action is required.

COMMENT NO. 2:

Page 1-1; Section 1.0, General Information

This section should be revised to include a description of any remaining contaminated buildings in the non-DOE controlled area. This description should include a statement regarding who is responsible for decommissioning of these facilities, the cost of decommissioning these buildings, and the schedule for decommissioning. If a document currently exists that includes this information, Rockwell should provide a copy for our review.

RESPONSE:

License-Exempt DOE Controlled Facilities in Non-DOE Controlled Areas

There are other radiological facilities in the non-DOE controlled areas of SSFL that were used for DOE programs and for which DOE maintains responsibility for decommissioning. None of the facilities are NRC licensed. The schedule and budget for decommissioning of the remaining facilities is contained in the DOE 5-year plan (SSFL Site Specific Plan). A brief summary of their status is presented below.

Old Conservation Yard

The Old Conservation Yard is located on the boundary of the DOE controlled area in the northeast section of Area IV of SSFL. Low levels of Cs–137 contamination in the soil have been cleaned up and a final survey performed.

- N704SRR990030, "Final Decontamination and Radiological Survey of the Old Conservation Yard," August 16, 1990.

An independent verification survey was performed by Oak Ridge Institute of Science and Education (ORISE) June 9–10, 1992. The ORISE report is yet to be issued but the ORISE team indicated verbally that their survey suggested the site was suitable for release without radiological restrictions. DOE retains responsibility for this site and would be the agency to release the site for use without radiological restriction once the ORISE report is completed. No NRC action is required.

Decon Trailer

Building 114 is an inactive empty trailer that had been designated a decontamination facility for personnel injuries/contamination. It was never used for this function, and routine surveys have shown no contamination. A confirmatory survey of Building 114 will be performed during the final stages of the SSFL facilities decommissioning. No NRC action is required.

Building 005

Building 005 used to house a uranium carbide fuel fabrication facility. The facility operated as a license–exempt facility under the AEC and never had an NRC license. The facility was dismantled, partially cleaned up, and a survey performed.

- GEN–2R–0003, "Radiological Survey of Building 005," November 16, 1987.

The survey concluded that the only remaining contamination was about 1 mCi of uranium in the ventilation exhaust ducts and the filter plenums. Removal of this equipment is currently under way. Final decommissioning of Building 005 is being funded under the DOE 5–year plan and is scheduled for completion in CY 1992. Following decommissioning, a final survey will be performed by Rockwell and an independent verification survey will be performed by ORISE for DOE. DOE will then release the facility for use without radiological restrictions. No NRC action is required.

Building 011

Building 011 is currently used as the Radiation Instrumentation Services Laboratory. Only sealed calibration sources are used in the facility. Uranium or plutonium sources are no longer used for calibration and have been disposed of to U.S.

Ecology in Beatty, Nevada. No encapsulated material has been used in Building 011, and it will continue to be used for calibrating/maintaining radioactive detection instrumentation. Radioactive sources used here are included in the State of California Radioactive Materials License 0015-70 and Rocketdyne's "User Authorization" No. 124. No NRC action is required.

Building 373

Building 373 was used for low power testing of various SNAP reactor designs in the 1950s. The activities were license-exempt under the AEC. In 1959, all radioactive material was removed and a survey performed. A survey was again performed in 1988.

- GEN-ZR-0012, "Radiological Surveys of Building 373," August 26, 1988.

This survey report and the facility will be reviewed and inspected to determine if it can be released for use without radiological restriction. An independent verification survey by ORISE will be performed to verify that the facility is suitable for release without radiological restriction. No NRC action is required.

Sodium Disposal Facility (Building 886)

The Sodium Disposal Facility became inadvertently contaminated with low-level mixed fission products some time in the 1960s and 1970s. Estimated total activity is 1 mCi of activity predominantly in a 1,000 ft^2 area or about 1% of the total facility area. Only one 10 ft by 10 ft area showed surface gamma readings, distinguishable from background (13 μR/hr above background). The DOE is funding the cleanup of Building 886 and it is part of DOE's 5-year plan. Rockwell is under a closure order from the Regional Water Quality Control Board (RWQCB) to clean up the lower pond portion of Building 886 by December 1, 1992, under the Toxic Pits Cleanup Act (TPCA) because of the presence of hazardous material. The closure is being overseen by RWQCB, the California Department of Toxic Substances Control (CDTSC), the California DHS, and the Federal EPA. The whole Building 886 area will be excavated to bedrock and backfilled with "clean" dirt. All excavated soil with any detectable contamination above background will be disposed of as R/A waste to a DOE disposal facility or treated as mixed waste if it is also hazardous. Final gamma surveys will be performed by Rocketdyne, and an independent verification survey will be performed by ORISE. DOE will then release the facility for unrestricted use. No NRC action is necessary.

Building 009

Building 009 housed two critical assemblies (organic moderated reactor and sodium graphite reactor) between 1959 and 1964. These were license-exempt activities under the AEC. All equipment was subsequently removed and the facility decommissioned. Two recent surveys were performed and documented.

- GEN-ZR-0014, "Radiological Survey of Building 009," August 26, 1988.
- N704SRR990032, "Final Decontamination and Radiological Survey of Portions of Building 009," December 16, 1990.

The 1990 survey report concludes that the facility is suitable for release for use without radiological restriction. The building is currently used to store Inservice Inspection (ISI) equipment, some of which is contaminated from use at commercial nuclear plants. This equipment is stored in boxes. Building 009 and the ISI activities are included in the State of California Radioactive Materials License 0015-70 and Rocketdyne "User Authorization" No. 144. Plans are currently under way to sell the ISI equipment. When the equipment leaves the facility, arrangements with the State will be made to delete Building 009 from the State license. The State will employ an independent contractor (probably ORISE) to conduct an independent verification survey of Building 009 before they release Building 009 from the State license. No action by NRC is required.

COMMENT NO. 3:

Page 1-1; Section 1.0, General Information

Detailed characterization information needs to be provided for all the rooms in the RIHL. This information should include nuclide distribution, exposure rates, and surface contamination levels. There is very little characterization information provided in the plan and for many rooms none at all. Where decommissioning is completed, indicate the level of contamination removed and when the survey is to be completed.

RESPONSE:

The information requested has been included in Sections 2.2 through 2.2.15.

COMMENT NO. 4:

Page 2–3; Section 2.2, Decommissioning Description

This section provides a description of each area that requires decontamination in the Hot Lab. This section should be revised to reflect the areas that have now been decontaminated, the areas currently being decontaminated, and the remaining areas to be decontaminated. The description should reflect any changes resulting from information and experience gained from performing the actual decommissioning of the Hot Lab. In addition, the description should address how remote decontamination operations will be performed and if contamination was found behind the steel liners on the walls or floors as a result of surveys conducted during decommissioning.

RESPONSE:

Sections 2.2.1 through 2.2.15 have been revised to reflect the current status of the D&D of the RIHL. Remote decontamination operations have not been used to remove contamination behind the steel liners. The steel liners on the walls and floors will be removed so "hands–on" surveys can be made. See Section 2.2.1.

COMMENT NO. 5:

Page 2–3; Section 2.2, Decommissioning Description

How are liquids and grit blasting materials removed from the cells during decontamination operations? How are these materials processed prior to disposal?

RESPONSE:

The information requested has been included in Section 2.2.

COMMENT NO. 6:

Page 2–5; Section 2.2.2, Glove Box Laboratory, Laboratory Room, and Manipulation Maintenance

What are the nuclide concentrations, contamination levels, and exposure rates in the second glove box? In addition, how will radioactive asphalt/asbestos tiles in Room 128 be removed and handled?

RESPONSE:

The information requested has been included in Section 2.2.2.

COMMENT NO. 7:

Sections 2.2.5, 2.2.9 and 4.4

Provide detailed information on how the floor drains will be surveyed and show how the methods proposed will provide an acceptable sensitivity for all the nuclides that are present.

RESPONSE:

Floor drains will be removed and disposed of as radioactive waste; see 2.2.9.

COMMENT NO. 8:

Page 2–7; Section 2.2.8, Radioactive Exhaust System

Explain how and where the containment tents will be used? How are these tents filtered? In addition, how will the stack be decontaminated and surveyed?

RESPONSE:

The information requested has been included in Section 2.2.8.

COMMENT NO. 9:

Page 2–8; Section 2.2.10, Roof

How will roof core samples locations be selected? Why is the Canberra detector acceptable for detecting all nuclides that might be present with a sensitivity suitable for demonstrating compliance with the release limits?

RESPONSE:

See Section 2.2.10 which was rewritten to respond to the comment.

COMMENT NO. 10:

Page 2–10; Section 2.3, Procedures

Is the approved control program referenced in this section the same control program used during operations? If so, provide a reference to these previously approved programs.

RESPONSE:

The Engineering Document Control group is used by Advanced Programs and their procedures meet the requirements of NQA–1 for document control.

COMMENT NO. 11:

Page 2–11; Section 2.4, Readiness Reviews

A copy of the readiness reviews for the decommissioning activities should be provided.

RESPONSE:

Readiness reviews would be held for activities that are new or significantly different from the existing experience base. All of the D&D activities conducted thus far have been within the existing experience base; therefore, no readiness reviews were conducted.

COMMENT NO. 12:

Page 2–12; Section 2.5, Schedule

This section needs to be revised to reflect the current schedule for completion of the decommissioning of the Hot Cell. The schedule should reflect the work completed, as well as the schedule for completion of the remainder of the decommissioning activities. For example, if schedule delays have resulted from having to remove more of the steel liner on the floors or walls of the facility than was initially estimated, the delay should be addressed.

RESPONSE:

The schedule shown in Section 2.5 has been revised to reflect previous D&D activities and the planned activities for the future. A separate task is shown for the removal of the steel liner.

COMMENT NO. 13:

Page 2–15; Section 2.6, Organizational Responsibilities and Authority

This section should be revised to reflect the current organization for the Rocketdyne Division of Rockwell International Corporation submitted to NRC in the February 24, 1992, letter (Austin/Rutherford) and incorporated in License Agreement No. 8 that was issued April 20, 1992.

RESPONSE:

Section 2.6, Organizational Responsibilities and Authority, has been revised to show the latest Rocketdyne organizational structure which includes Radiation Protection & Health Physics Services; Health, Safety & Fire Engineering; Environmental Protection; Quality Assurance; Program Management; and Nuclear Operations.

COMMENT NO. 14:

Page 2–15; Section 2.6, Organizational Responsibilities and Authority

It is unclear what the individual roles of ETEC, GPOD, and RP&HPS are in the radiation protection program. Provide a more detailed explanation of how each of these organizations function.

RESPONSE:

Section 2.6 has been expanded to describe the individual roles of the various groups required to perform the D&D activities.

COMMENT NO. 15:

Page 2–15; Section 2.6, Organizational Responsibilities and Authority

What is the role of HSE with respect to radiologic safety?

RESPONSE:

The Environment, Health and Safety (EHS) division director now reports directly to the president of the Rocketdyne Division and is independent of the operating units performing the actual D&D tasks. Radiation Protection and Health Physics Services is part of the EHS division. The responsibilities of EHS are described in Section 2.6.

COMMENT NO. 16:

Page 2–17; Section 2.7, Training

Is this the same training program that was approved for operations? If so, reference the documents that describe the training program. If the training program for decommissioning differs from the training program for operations, describe the changes in the program for decommissioning.

RESPONSE:

The Radiation Training program is the same that was approved for operations.

COMMENT NO. 17:

Page 3–1; Section 3.0, Radiation Protection

Is the decommissioning radiation protection program discussed in this section the same radiation protection program approved for operations of the facility? If so, reference the documents that describe the operational radiation protection program and discuss any changes to the program.

RESPONSE:

The radiation safety program at Rocketdyne is described om Health and Safety Procedure G-01, "Radioactive Materials and Ionizing Radiation", Revised June 3, 1992. The facility specific radiation program for the Hot Laboratory is described in RP&HPS document 173SRR000003, "Radiation Safety Plan for Rockwell International Hot Laboratory-T020", Revised June 24, 1991. Any required changes to the radiation protection program are reflected in periodic revisions to this document. Radiation Protection and Health Physics programs at Rocketdyne continue to comply with the full requirements of 10CFR20, DOE Order 5480.11 and State of California regulations Title 17.

COMMENT NO. 18:

Page 3-1; Section 3.0, ALARA Policy

What are the estimates for staff-Rem exposures for this decommissioning effort?

RESPONSE:

The planning limit is less than 1.0 rem per calendar quarter whole body dose; however, the current actual exposures are much less than this planning limit.

COMMENT NO. 19:

Page 3-3; Section 3.3, Health Physics Program

Discuss any changes from the existing health program used for operations.

RESPONSE:

The radiation safety program at Rocketdyne is described om Health and Safety Procedure G-01, "Radioactive Materials and Ionizing Radiation", Revised June 3, 1992. The facility specific radiation program for the Hot Laboratory is described in RP&HPS document 173SRR000003, "Radiation Safety Plan for Rockwell International Hot Laboratory-T020", Revised June 24, 1991. Any required changes to the radiation protection program are reflected in periodic revisions to this document. Radiation Protection and Health Physics programs at Rocketdyne continue to comply with the full requirements of 10CFR20, DOE Order 5480.11 and State of California regulations Title 17.

COMMENT NO. 20:

Page 3–4; Section 3.3.2, Radioactive Exhaust Systems

This section should include a discussion of the Environmental Monitoring Program. The Environmental Monitoring Program should include a discussion of the groundwater monitoring program for the site.

RESPONSE:

Section 3.2, Environmental Monitoring Program, has been added to the document.

COMMENT NO. 21:

Page 3–4; Section 3.3.2.1, High–Volume Cell Ventilation

Is this the same ventilation system used during operation of the facility? If so, this should be stated. In addition, this section should state at what level the exhaust system will shut down.

RESPONSE:

Yes, the RA ventilation system is the same as that used for operations. See Figure 2–5 for when exhaust system will be shut down and disassembled.

COMMENT NO. 22:

Page 3–6; Section 3.5, Radioactive Waste Management

Will any of the waste materials be sent to a commercial disposal site? What waste acceptance requirements has DOE placed on wastes from Santa Susana? What is Rockwell's program for ensuring wastes meet disposal site requirements?

RESPONSE:

The RA waste will be sent to the Nevada Test Site. Hazardous waste will be sent to a licensed commercial disposal site. After the building is decontaminated and released for unrestricted use, the building will be demolished. Waste from the demolished building will be sent to a commercial disposal site. Process documents and travelers for waste boxes require oversite by Environmental, Health Physics, and Quality Assurance.

COMMENT NO. 23:

Page 3–6; Section 3.5, Radioactive Waste Management

Are there any sodium contaminated wastes that will be generated? What will happen to contaminated lead? What other mixed wastes will be generated other than the acid wastes discussed in the report?

RESPONSE:

There are no sodium contaminated wastes that will be generated. Contaminated lead will be recycled through the licensed Hake Association, Memphis, TN. See Section 3.6 for discussion of other wastes.

COMMENT NO. 24:

Page 4–1; Section 4.0, Final Radiation Survey

This section needs to be revised to reflect the current NRC criteria for unrestricted release. "Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use or Termination of License for Byproduct, Source, or Special Nuclear Material," Policy and Guidance Directive FC 83–23, Division of Industrial and Medical Nuclear Safety, August 1987. NUREG/CR–5512 is a draft and is not valid for use for pathway analysis. In addition, the license should also compare the groundwater pathway dose to a drinking water standard of 4 millirem/yr (TEDE).

RESPONSE:

This section was revised to reflect the above comment.

COMMENT NO. 25:

Page 4–1; Section 4.0, Final Radiation Survey

This section needs to be revised to incorporate the current guidance for surveys provided in NUREG/CR–2082, "Monitoring for the Compliance with Decommissioning Termination Survey Criteria." Additional guidance will be available in the near term.

RESPONSE:

This section was revised to reflect the comment.

COMMENT NO. 26:

Page 4–1; Section 4.0, Final Radiation Survey

What are the detailed Rockwell procedures for releasing materials for unrestricted release?

RESPONSE:

The detailed working procedure for performing the final survey is documented in 173DWP000021, "RIHL Final Radiological Survey Procedure," May 24, 1988. The procedure used for releasing equipment for unrestricted use is documented in N001OP000034, "Procedure for Surveying and Releasing Non–Radioactive Equipment and Waste From Radiological Facilities," revised June 30, 1992.

COMMENT NO. 27:

Page 4–2; Section 4.3, Background Radiation

What is the purpose of this section? What are the background measurements referred to in this section?

RESPONSE:

The Background Radiation Section was removed.

COMMENT NO. 28:

Page 5–1; Section 5.0, Funding

This section should be revised to include a description of the financial assurance mechanism required by CFR 70.25 (f).

RESPONSE:

Section 5.1, Financial Guarantee, has been added.

COMMENT NO. 29:

Page 5–1; Section 5.0, Funding

This section should be revised to reflect the updated cost to decommission the facility. The cost estimate should include costs incurred to date as well as an updated estimate of the total cost to decommission the facility. The estimate should incorporate additional costs resulting from an increase in scope resulting from information and experience gained during the actual decommissioning of this facility. For example, costs should include the additional costs, if any, resulting from removing and decontaminating the Hot Cell doors and the additional costs resulting from having to remove more of the steel liner from the walls or floor than was initially estimated.

RESPONSE:

The section was revised to include the previous cost of D&D and the cost of removing the cell liners and shielding doors.

D635-0264