

From: [Ross, Sandra](#)
To: [Lancaster, Thomas](#)
Cc: [Applegate, Kent](#)
Subject: [External_Sender] SUA-1473 License Amendment Request Clarification Call on May 6, 2020
Date: Friday, May 08, 2020 4:10:42 AM

Hi Tom,

RAML is providing the following clarifications in response to a clarification call between NRC Staff and RAML on 6 May 2020 regarding RAML's 2020 license amendment request.

1. RAML's proposed changes to license conditions 10, 14, 16, and 17.

In its 2020 EA/LAR, RAML proposed to remove reference to obsolete health physics and environmental monitoring program submittals (dated August 30, 1990, January 31, 1991, and January 13, 1998) found in license condition (LC) 10 and to further consolidate, in LC10, requirements currently found in LCs 10, 14, 16, and 17. These requirements relate to maintenance of RAML's radiation protection and environmental monitoring (RPEM) program and standard operating procedures. In the EA/LAR, RAML proposed the following revised language for LC 10:

LC 10. This licensee shall maintain a radiation protection and environmental monitoring program.

Written standard operating procedures (SOPs) shall be established for all activities involving radioactive materials that are handled, disposed, or stored and all surveillance activities including environmental monitoring and radiation monitoring instrument calibration. These procedures shall specify radiation safety practices to be followed. Occupational exposure calculations shall be performed in accordance with 10 CFR 19.13.b and 10 CFR Part 20, Subpart C and documented in accordance with 10 CFR 20.2106. An up-to-date copy of each written SOP shall be kept in an area available to employees for reference. All SOPs and the radiation protection and environmental monitoring program shall be reviewed and approved by the RSO annually to ensure that proper and current radiation protection principles are being applied.

RAML's understands that NRC staff is concerned about the availability of the current RPEM manual prior to a site inspection. Currently, RAML provides courtesy copies of the RPEM manual to NRC staff at their request. Most commonly, RAML provides these copies prior to NRC's routine license inspection activities.

RAML's concern is that the RPEM manual is an evergreen document. RAML updates its RPEM manual annually; requiring an annual NRC technical review and license amendment would undermine RAML's ability to make timely revisions to the document, as made necessary by changes in site conditions and/or current radiation protection principles. At present, there is no license requirement for NRC approval of RAML's RPEM manual. In a Technical Evaluation Report dated December 20, 2017 (ML17293A342) NRC states that:

License Condition 10 indicates that the environmental monitoring program will be reviewed consistent with License Condition 14. License Condition 10 narrowly defines program element changes that require prior NRC approval as limited to “Any changes to the mill circuit ... shall require approval by the NRC in the form of a license amendment.” License Condition 14 describes that “All [standard operating procedures] SOPs shall be reviewed annually to update procedures and be approved by the [Radiation Safety Officer] RSO to ensure that proper radiation protection principles are being applied.” Thus, changes to the environmental monitoring program would not require NRC approval.

RAML’s proposed path forward is to provide a courtesy copy of its RPEM manual to NRC each year after the document is updated. This would provide a copy for NRC inspectors’ use at an unannounced or scheduled inspection, while providing RAML flexibility in maintaining its RPEM program. RAML currently follows a similar process for distribution of its annual ALARA report: no license condition requires submission to NRC, but RAML has committed to providing its annual ALARA report to NRC on a courtesy basis each year (e.g., ML19028A155, ML19231A145)

2. RAML proposes the following modified language for LC-34.

Based on the clarification call and the intention to propose additional ACLs in the future, RAML withdraws the proposed deletion of “quarterly for the first two years” from the February 14, 2020 License Amendment Request (ML20054B747).

3. Analytical Methods for Radionuclides

NRC staff inquired about analytical methods for radionuclides. For groundwater, laboratory reports that contain analytical methods are attached to the semiannual groundwater monitoring reports submitted to NRC.

If you require additional clarifications please contact me via email or at 916-947-7637.

Sincerely,

Sandra Ross
Manager US Legacy Assets
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