

Official Transcript of Proceedings
NUCLEAR REGULATORY COMMISSION

Title: Modernizing the NRC Fuel Cycle and Materials
Decommissioning Inspection Program

Docket Number: (n/a)

Location: teleconference

Date: Wednesday, June 9, 2021

Work Order No.: NRC-1524

Pages 1-50

NEAL R. GROSS AND CO., INC.
Court Reporters and Transcribers
1323 Rhode Island Avenue, N.W.
Washington, D.C. 20005
(202) 234-4433

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

+ + + + +

MODERNIZING THE NRC FUEL CYCLE AND MATERIALS

DECOMMISSIONING INSPECTION PROGRAM

+ + + + +

PUBLIC MEETING

+ + + + +

WEDNESDAY,

JUNE 9, 2021

+ + + + +

The Public Meeting convened via Video
Teleconference, at 1:00 p.m. EDT, Rob Evans,
Moderator, presiding.

NRC STAFF PRESENT:

- ROB EVANS, Region IV
- JENNI DALZELL, Region III
- MAURICE HEATH, NMSS
- TRISH HOLAHAN, NMSS
- MARY MUESSLE, Region IV
- MARTI POSTON-BROWN, NMSS

COMMENTERS PRESENT:

NIMA ASHKEBOUSSI, Nuclear Energy Institute

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

LARRY CAMPER, Talisman International
SCOTT MURRAY, GE Hitachi
KATIE SWEENEY, National Mining Association

TABLE OF CONTENTS

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Page

Introduction	4
NRC Staff Presentation	6
Public Feedback and Q&A Session	30
Closing Remarks	48

P R O C E E D I N G S

1:04 p.m.

1
2
3 MR. HEATH: Good afternoon, everyone, and
4 thank you for joining us. Today's public meeting will
5 discuss NRC's efforts to modernize the Fuel Cycle and
6 Materials Decommissioning Inspection Program.

7 My name is Maurice Heath. And I am an
8 engineer and project manager at the NRC Division of
9 Decommissioning, Uranium Recovery and Waste Programs.

10 I am going to quickly cover the logistics
11 for this meeting today. And as our operator,
12 Michelle, noted, everyone is in listening mode until
13 we get to the public comment portion of today's
14 meeting, which will occur after NRC's presentation.

15 If you are on the Webex, great. You
16 should be seeing our slides on your screen. If you
17 are not on the Webex and still would like to access
18 our slides or if you want to download a copy for your
19 use, you can find a link to them on the NRC public
20 meeting notice for today's meeting.

21 Today's meeting is an NRC information
22 public meeting, which means the staff will make a
23 brief presentation about modernizing the Fuel Cycle
24 and Materials Decommissioning Inspection Program and
25 then open the line to comments or feedback on this

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 topic.

2 At the end of the presentation, if you
3 want to make a verbal comment, Michelle, the bridge
4 line operator, will give instructions on how to place
5 your call in the comment queue.

6 We would ask that anyone making comments
7 attempt to limit their statements to three minutes.
8 We will provide an opportunity for a second round of
9 comments as time allows. But we want to make sure
10 that everyone has the opportunity to speak.

11 In order to successfully capture verbal
12 comments, this meeting is being recorded so that the
13 statements made today can be transcribed. So please
14 make sure you clearly state your name and if you wish,
15 company or affiliation before starting your comment.

16 You can also provide written comments at
17 any time through the Webex interface using the Q&A
18 dialogue box or the chat function window.

19 The speaking bubble icon is at the bottom
20 of your Webex screen. Simply type in your comment to
21 either window, which you should be able to locate in
22 the menu at the bottom of your screen. In there, the
23 NRC staff are capturing the comments and questions.

24 Should there be any technical issues with
25 Webex, the bridge line will not be affected and the

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 meeting slides are available as an attachment to the
2 meeting notice on NRC's public meeting website. So we
3 should be able to continue the meeting in a new format
4 as needed. Hopefully, we will not need to go this
5 route but just in case, we are prepared.

6 Also a reminder to members of the NRC
7 staff that we are on an open line as speakers. So
8 please be mindful of the mute and unmute function on
9 your phone as neither I nor the operator have control
10 over the portion of the bridge line.

11 Finally, I would ask that we all be
12 patient and a little flexible given the virtual nature
13 of today's meeting. Please forgive any delays in
14 changing the slides or pauses between speakers as the
15 NRC staff is trying to confer from several individual
16 locations. Also forgive any dogs barking, babies
17 crying or house phones ringing as this is part of our
18 new normal.

19 Thank you. And I would like to turn the
20 presentation over to Mr. Rob Evans, who is the team
21 lead for the Fuel Cycle and Materials Decommissioning
22 Inspection Working Group. Rob?

23 MR. EVANS: Thank you, Maurice. My name
24 is Rob Evans. I am a senior health physicist in the
25 NRC's Region IV office and an inspector.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 What I'd like to do is introduce the
2 presentation meeting presenters. Then I will request
3 opening remarks from Mary Muessle. I will provide
4 some background information about the working group.
5 And then we will shift into a discussion of the plan
6 changes to the inspection procedures themselves
7 followed by the current schedule for implementation of
8 the new procedure program. And then after we're done,
9 as Maurice indicated, with the formal presentation,
10 the NRC staff will accept questions and comments from
11 the public and industry.

12 Next slide. I wanted to -- just in a
13 moment I'll introduce Mary. But opening remarks will
14 be provided by Mary Muessle, the director, Division of
15 Nuclear Materials Safety in the Region IV office.

16 There will be three presenters, technical
17 information presenters, during this particular
18 meeting, myself, who is the chair of the working
19 group, Jenni Dalzell, an inspector in the Region III
20 office and Marti Poston, a health physicist in the
21 Office of Nuclear Material Safety and Safeguards.

22 And the facilitators, the NRC facilitators
23 for today's meeting, include Maurice, the program
24 manager who has introduced himself already and Kellee
25 Jamerson, a physical scientist, both with the Office

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 of Nuclear Material Safety and Safeguards.

2 Next slide. I am so sorry. I need to
3 introduce Mary, Mary Muessle, who will provide a few
4 openings remarks.

5 MS. MUESSLE: Okay. So thanks, Rob,
6 thanks, Maurice, and thanks, Michelle, for getting us
7 started. Can everybody hear me okay? Could I get a
8 signal there that I have successfully unmuted? Okay.
9 Thank you very much.

10 Before I even introduce myself, I do want
11 to not just thank the openers to the meeting, but to
12 the working group who you're going to hear from today.
13 They have really started a good ball rolling in
14 looking at this project and not just in looking at the
15 procedures themselves but how we can engage you all
16 more as people interested stakeholders and how we can
17 look at advancing NRC's aspirations, I would say, to
18 do more with technology and to be more clear in how we
19 use risk in our oversight function.

20 So my name is Mary Muessle. I am the
21 director of Nuclear Materials Safety in Region IV.
22 For those of you that are not familiar with our
23 region, Region IV provides oversight functions and
24 some licensing functions for sites and licensees,
25 really to the west of the Mississippi.

1 So that is my current role. But today I
2 am here as a representative of the National Materials
3 Program. And I am here as a sponsor for the working
4 group that's looking to modernize the fuel facility
5 and materials decommissioning guidance.

6 I am one of three executive sponsors in
7 that. Dr. Trish Holahan from our Office of Nuclear
8 Materials Safety and Safeguards is also a sponsor as
9 is Bill Irwin from the State of Vermont.

10 So the three of us are helping NMSS. That
11 office will be issuing the final guidance. But we are
12 here helping the working group as they look to do the
13 revision.

14 The NRC does strive to be a modern risk
15 informed reliable regulator and openness and
16 consistency in our guidance is integral to that.

17 We have an important mission in having
18 reasonable assurance of adequate protection in public
19 health and safety and in protecting the environment.
20 It's critical that we get this right and get the best
21 information out there.

22 And a large part of that is openness in
23 finding different views, understanding perspectives
24 and understanding the current environment. So we put
25 together a great diverse working group of NRC staff

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 members as well as Agreement State staff. And they
2 are looking at the guidance primarily in Inspection
3 Manual Chapter 2602, which has not been updated since
4 2008.

5 And while we do have this robust materials
6 program in fuel cycle decommissioning, we believe that
7 putting this group together will bring a clearer
8 perspective, will help bring more definition to things
9 and to use risk in the most appropriate way.

10 I mentioned that we have Agreement States
11 involved in this. They are our co-regulators in these
12 programs. And the perspectives that the Agreement
13 States bring are extremely important, and we value
14 their participation in the working group and in all
15 the forms that you may bring forward ideas in the
16 future.

17 We are also interested in other state
18 feedback. If you're not an Agreement State, from
19 tribes, from industry, from interest groups for
20 members of the public. And I think the working group
21 has done a good job of trying to figure out how to
22 creatively inform and engage you, including this
23 public meeting that we're having today.

24 So I look forward to the meeting. And I
25 will ask if Dr. Trish Holahan has anything she would

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 like to add before we get started?

2 DR. HOLAHAN: Thank you, Mary. Can you
3 all hear me now? I'm Trish Holahan. I'm the director
4 of the Division of Decommissioning, Uranium Recovery
5 and Waste Programs in the Office of Nuclear Material
6 Safety and Safeguards.

7 And I just want to reiterate everything
8 Mary said and thank the working group so much, both
9 the Agreement States and the NRC staff who has worked
10 hard to -- well, they're going to risk inform the
11 manual chapter and all the inspection procedures
12 accordingly for decommissioning material sites as well
13 as fuel cycle and uranium recovery sites.

14 And so with that, I'll turn it back over
15 to Rob and let him carry on.

16 MR. EVANS: Thank you, Trish. Thank you.
17 Next slide. Earlier this year, the NRC collectively
18 decided to form a working group that consists of joint
19 NRC and Agreement State staff to update Manual Chapter
20 2602, Decommissioning Oversight and Inspection Program
21 for Fuel Cycle Facilities and Materials Licensees.

22 The goal of the working group was to
23 update the inspection program to be more risk-
24 informed, performance-based. And just kind of as an
25 aside for a moment, the program in the past leaned a

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 little towards what's called a compliance-based
2 inspection, which was a verification of the procedures
3 and programs and implementation of the programs.

4 As we go into the future, we're more
5 interested in connecting risk-informed, performance-
6 based inspections, which is an approach that considers
7 risk insights, analysis and judgment and performance
8 history to focus attention on the most important
9 activities and focus results over a cross-tested
10 method.

11 Next slide. So this particular
12 implementing procedure, Inspection Manual Chapter
13 2602, will apply to 10 CFR Parts 30, 40 and 70
14 licensed sites, which, of course, includes source
15 material licenses, special nuclear material licenses
16 and fuel cycle facility licenses.

17 It will include uranium recovery
18 decommissioning, which is currently addressed in two
19 different manual chapters. For those of you who are
20 in the uranium recovery industry, you may recall that
21 2801 applies to conventional mills and 2641 applies to
22 in situ recovery sites. So what we plan to do is to
23 take the decommissioning portions out of those two
24 manual chapters and put them into 2602 as part of the
25 fuel cycle program.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 This particular Manual Chapter 2602 does
2 not include reactor decommissioning and that includes
3 power and non-power decommissioning or basically the
4 Part 50 licenses. It does not include independent
5 spent fuel storage installations, a/k/a ISFSIs. And
6 it does not include licensees basically that are not
7 in decommissioning. So an operating material skill
8 cycle in the uranium recovery sites will not be
9 captured under this inspection program.

10 So next slide, please. So the objectives
11 of the working group is to develop, as I mentioned, a
12 risk-informed, performance-based decommissioning
13 inspection program.

14 So what we decided to do is rather than
15 take the existing procedure and do word changes on it,
16 we decided to basically revise the program from the
17 ground up. So we redesigned a Fuel Cycle and
18 Materials Decommissioning Inspection Program in some
19 ways just by starting with an outline of what we
20 wanted in that program and then we created a procedure
21 off of that outline. So it's kind of a ground-up
22 rebuild of the inspection program.

23 We didn't want problems from the past for,
24 like, compliance-based inspections to carry over into
25 the future.

1 So in addition to this, the second bullet
2 is we're going to be developing standalone inspection
3 procedures for the Uranium Recovery Decommissioning
4 Program.

5 And finally the third bullet is at some
6 future date we will develop a training program and
7 provide training and support for rollout of the
8 revised inspection program.

9 And I should point out that a charter for
10 the working group was issued in March 2021. And it's
11 listed on the reference slide at the very end of the
12 presentation if you have an interest in taking a look
13 at the working group charter.

14 Oh, next slide, please. The working group
15 itself consists of eight subject matter experts from
16 the NRC's headquarters' office. We have a
17 representative from each of the four regional offices.
18 And we have a representative from the Agreement
19 States.

20 In addition, there's a steering committee
21 that provides management level oversight to the
22 working group, which includes Trish and Mary, who
23 introduced themselves a few moments ago but as well as
24 Bill Von Till. Not listed is Steven Koenick and Bill
25 Irwin, State of Vermont.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 And the last bullet, a guiding coalition,
2 as it's called, of supervisory level staff provides
3 guidance, support and change management to the working
4 group. And we have monthly meetings.

5 So if the working group has a problem or
6 an obstacle, for example, it's presented to the
7 guiding coalition for discussion. We get their
8 information, their feedback, their suggestions and
9 then we will change course accordingly.

10 An example of where the guiding coalition
11 comes in handy is we were struggling with terminology.
12 We have to keep terminology straight across the
13 various NRC programs. And so we got into a situation
14 where we were concerned about terminology, for
15 example, the difference between complex
16 decommissioning and non-complex decommissioning. So
17 we brought that to the guiding coalition for
18 discussion.

19 Next slide, please, so the plan changes to
20 the Manual Chapter 2602. We're identifying the risks
21 by program area, uranium recovery, fuel cycle, complex
22 and non-complex material sites.

23 I should point out that each of these
24 program areas have different risks. We plan to
25 describe the process for conducting risk-informed,

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 performance-based inspections, and it will include
2 requirements for the inspectors as well as guidance
3 for the inspectors.

4 And the last bullet is the program will be
5 written as such to allow the inspector to use a risk-
6 informed process to make decisions for each inspection
7 based on actual site conditions.

8 Every site will be different. So
9 therefore how you approach the inspection will be
10 different. And one of the ways we plan to do this is
11 by using a concept called Be riskSMART, the Be
12 riskSMART process.

13 So what I'd like to do now is turn it over
14 to Jenni, if you can introduce yourself and then
15 continue the discussion on risk. Thank you.

16 MS. DALZELL: Thank you, Rob. As he said,
17 my name is Jenni Dalzell. I am an inspector out of
18 the NRC Region III office in Lisle, Illinois.

19 As previously mentioned, the working group
20 is revising the inspection guidance to include more
21 risk insights into both the Fuel Cycle and Materials
22 Decommissioning Programs.

23 The Be riskSMART framework is a tool that
24 allows the NRC to consider risk insights together with
25 other factors in the decision-making process.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 The working group will be including the
2 concept from the Be riskSMART framework in the
3 revisions to the Inspection Manual Chapter 2602 along
4 with the associated inspection procedures.

5 Next slide, please. Using the Be
6 riskSMART concept, the working group will address the
7 radiological risk. The radiological risk of a
8 specific decommissioning facility will greatly depend
9 on what radioactive materials are present, in what
10 forms, and in what quantities are they being used and
11 stored at a facility?

12 Each of these factors will have to be
13 considered when planning inspections, using the
14 revised guidance. And there will need to be maybe
15 adjustments made to the inspection plan to address
16 those risks.

17 Next slide, please. To help the
18 inspectors, the working group is planning to include
19 risk modules in the Inspection Manual chapter along
20 with the core inspection procedures.

21 This will be to help the inspectors
22 address the risks associated with decommissioning
23 inspection activities. These risk modules will be
24 used to help inspectors determine what elements are
25 most important to cover during an inspection.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 There's another working group, the
2 Inspection Manual Chapter 2800 group, which is the
3 Materials Inspection Program, that is also in the
4 process of risk informing their inspection guidance as
5 well, and they will be using risk modules in their
6 guidance.

7 Next slide, please. The working group is
8 proposing seven risk modules for the Fuel Cycle and
9 Materials Decommissioning Inspection program.

10 These risk modules were chosen to ensure
11 the most important aspects of a licensee's program are
12 covered by the inspection program.

13 The seven proposed risk modules are
14 security and control of licensed materials,
15 observation of decommissioning activities,
16 occupational radiation protection, waste generation,
17 storage and transportation, public dose, effluent
18 releases and environmental monitoring, management
19 organization and controls and finally final status and
20 confirmatory surveys.

21 The inspectors will use the Be riskSMART
22 framework to determine which of these risk modules
23 will need to be completed during an inspection and
24 also taking into consideration the status of the
25 facility and the work that is being conducted.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 Up next, we have Marti Poston-Brown, who
2 will be discussing the inspection procedures.

3 MS. MUESSLE: You're on mute, Marti.

4 MS. POSTON-BROWN: Thanks, Jennifer. I'm
5 sorry. Good afternoon. I apologize for not
6 remembering to turn my mute off.

7 I'm Marti Poston. I'm currently a staff
8 health physicist with the Uranium Recovery and
9 Materials Decommissioning Branch. I joined them in
10 August. Before that I was a uranium recovery and
11 decommissioning inspector out of Region IV in Texas.

12 So how are we going to focus on risk?
13 Well, as you've heard previously, we are going to
14 revise Inspection Manual Chapter 2600 to include
15 requirements and guidance that we feel should be
16 considered during decommissioning of facilities that
17 fall under the four disciplines, fuel cycle, uranium
18 recovery, complex materials and non-complex materials.

19 Remember, as Rob said, reactor
20 decommissioning in ISFSI facilities are not going to
21 be covered under this manual chapter.

22 Requirements and guidance will be defined,
23 referenced or summarized in the manual chapter to
24 direct the inspector for additional information.

25 The document will also include some

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 requirements and guidance -- well, the document will
2 include, excuse me, some requirements and guidance
3 that are not applicable to all the modalities. We're
4 going to address this by having attachments to the
5 manual chapter for each modality that specifies which
6 documents and guidance information is applicable to
7 that modality.

8 We're also going to include information
9 associated with core and discretionary procedures for
10 each modality.

11 Next slide, please. The core procedures
12 will be developed for five modalities as you can see
13 here, uranium recovery, fuel cycle facilities, complex
14 material sites, non-complex material sites and final
15 status and confirmatory surveys.

16 The core IPs are going to have the minimum
17 inspection requirements that are necessary to meet the
18 objective of that IP and the risk modules, as Jennifer
19 and Rob have both indicated, will be applied for each
20 particular program area.

21 The design is to focus the inspector's
22 attention on the most risk significant issues
23 associated with that modality so that the inspector is
24 putting the emphasis on the right syllable, if you'll
25 excuse the expression, and we believe that the core IP

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 should be reviewed at each inspection.

2 Next slide, please. The guidance
3 requirement for risk modules will also be applicable
4 to discretionary procedures. And those will also be
5 addressed within IMC 2602.

6 These procedures are not required to be
7 reviewed at every inspection. Rather the inspector
8 bases the use of the discretionary IPs on site
9 activities and conditions at the sites.

10 I'd like to point out, I mean, that there
11 are some things listed here that should be, like,
12 don't they want to look at radiation protection every
13 year, or excuse me, every inspection? Yes.

14 But the reason we put some of these like
15 radiation inspection in discretionary IPs is because
16 it's not going to be an inspection procedure that is
17 specific to decommissioning. It's a more generic IP
18 that goes across multiple programs so that if we're in
19 a situation where you're doing an inspection at a site
20 that part of it is operational and part of it is under
21 decommissioning, you can still use the radiation
22 protection procedure to look at both of those
23 programs.

24 Use of the more generic IPs helps the
25 inspector use discretion -- sorry. I just said that.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 I apologize.

2 Next slide. One of the things that we're
3 also proposing is an inspection frequency be added to
4 2602. In the previous versions of 2602, the
5 inspection frequency was not specified. It was pretty
6 much left up to a negotiation between the project
7 manager and the regional inspection staff as to how
8 frequently a site would be inspected.

9 That was based on the fact that there are
10 situations where there is nothing going on at the site
11 because the site has got a decommissioning plan that
12 they're waiting for the NRC to approve or they're in
13 the process of preparing their decommissioning plan.
14 So they're basically on stand by and there's no
15 activities to be inspected.

16 So we decided to address that by
17 establishing a minimum frequency of plus or minus
18 three months. But, as I've said, there are situations
19 where there's no need to inspect because there's not
20 anything going on. So we're allowing the regional
21 staff with the concurrence of the project manager to
22 document the reason for not performing inspections to
23 the docket file so that 5 years down the road, 10
24 years down the road, it's clearly understood why an
25 inspection was not done at the minimum frequency.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 Now this doesn't mean that we can't go
2 more frequently. We can. That's going to be allowed
3 based on the NRC resources, based on site activities
4 like key performance and enforcement history.

5 So we're just trying to establish some
6 kind of minimum, make sure we document and it still
7 allows the inspectors the flexibility to determine the
8 frequency of inspection along with the concurrence of
9 the project manager for that particular site.

10 So I think I'm done talking about the
11 inspection portion, and I'm ready to turn it back over
12 to Rob. Thank you.

13 MR. EVANS: Thank you, Marti. I wanted to
14 briefly mention some various NRC initiatives that will
15 be reviewed and included in the revised inspection
16 program as needed. And I would like to point out that
17 we have developed a project plan that's being used to
18 keep track of all of these various ideas.

19 So if there's some sort of idea or concept
20 that we need to consider or incorporate then it goes
21 into the project plan to help keep track of all of
22 these various moving parts so to speak.

23 So the first one is managing changes in
24 inspection frequencies. So we have to make sure that
25 the guidance that we provide within the manual chapter

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 is consistent with NRC guidance across the different
2 program areas.

3 Benchmarking with other working groups,
4 again, to maintain consistency across these working
5 groups as we revise the procedures. And a good
6 example is the Manual Chapter 2800 Working Group. As
7 we mentioned earlier, we're in close contact with that
8 working group so we can maintain consistency between
9 the groups.

10 So the idea is when a material site is in
11 operation and it goes into decommissioning, there's
12 kind of a seamless transfer because the terminology
13 and concepts are the same when you go across from one
14 manual chapter to another manual chapter.

15 A third bullet is managing issues of low
16 safety significance. This is an emerging issue that
17 we're still taking a look at. But in simple terms, if
18 the issue is likely outside the licensing basis and is
19 of very low safety significance, then the inspector
20 may have the ability to stop pursuing the issue and
21 refocus their resources elsewhere.

22 The next bullet, maintaining consistent
23 terminology across the NRC. This one has come up a
24 couple of times with our working group. So if we come
25 up with a definition or something that kind of needs

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 to be defined, we need to make sure that it is
2 absolutely consistent across the NRC. And as I had
3 mentioned earlier, one example is differentiating
4 between complex and non-complex decommissioning.

5 And then the last bullet is managing
6 changes in technologies over time. And how we plan to
7 address that is still under consideration. An obvious
8 example for some of you who have experienced it is
9 remote inspections using electronic technologies as
10 well as there's been some NRC attempts to consider,
11 like, handheld devices during inspections.

12 So obviously, life changes, the world
13 changes, technology changes. So how are we going to
14 address that in the manual chapter? There's more to
15 come on that.

16 Next slide. I just wanted to reiterate our
17 communications strategy and outreach. So the working
18 group is supported by the Agreement States. Any
19 changes that we make to the program will have to go
20 through the internal and external stakeholder reviews,
21 and external being Agreement States.

22 Both, I'd like to mention, they're
23 representative of oversight groups, and both will
24 provide comments on the draft documents. These
25 procedures will ultimately be used by NRC as well as

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 Agreement State staff, either directly or in some
2 similar form. So we felt that it was important to get
3 the Agreement State support as we develop and revise
4 the Decommissioning Inspection Program.

5 And we also at the very beginning elected
6 to conduct outreach to non-Agreement Streets, Tribes,
7 other federal agencies. We did issue what's called a
8 State and Tribal Communication Notification Letter.
9 It went out May 13. I've got a reference for that in
10 just a moment.

11 This meeting is an attempt to kind of like
12 inform the public and industry of what we're doing.
13 And we've also agreed that we're going to host a
14 second public meeting about the time of rollout of the
15 procedures to let everyone know these are the
16 procedures. This is what they look like. These are
17 the changes that we implemented. You'll be aware, you
18 as the public and industry, are aware of what the
19 procedures look like.

20 Next slide, please. So at this point in
21 time, we plan to have the draft procedures complete
22 for internal and external stakeholder review by August
23 or September. There has been some discussion about we
24 may dry-run test some of the procedures at a few
25 currently licensed sites. That's to be determined.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 We plan to incorporate all NRC and
2 Agreement State comments by the end of the year, and
3 issue the documents by the end of 2021 or early 2022.
4 And as I just mentioned, we plan to host a public
5 meeting and introduce the new program.

6 And the last bullet is with NRC Technical
7 Training Center support, we plan to provide training
8 to inspectors on the new program. Now what we haven't
9 fully decided is whether or not we will provide the
10 training to Agreement States or just simply give them
11 the NRC's training program and let them train
12 themselves. So the training is still to be
13 determined.

14 Next slide, please. I just wanted to give
15 you a quick update of the status of the other working
16 groups and the other inspection programs if you were
17 wondering.

18 So there's a Manual Chapter 2561 Working
19 Group for the Decommissioning Power Reactor Inspection
20 Program. They completed their work, and they re-
21 issued their procedures in January.

22 The Research and Test Reactor Inspection
23 Program, which includes decommissioning of RTRs,
24 research and test reactors, was revised and reissued
25 in May of 2020.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 The uranium recovery and 112.(2) byproduct
2 material facility inspection program, 2801, has been
3 revised. It has not been issued. It's currently
4 undergoing final internal reviews. And it should be
5 issued within the next couple of weeks.

6 And for any of you who happen to be on the
7 line that are in the uranium recovery industry, there
8 is a National Mining Association meeting scheduled for
9 late July. And I have proposed to give a presentation
10 at that meeting to describe 2801 and 2602 as it
11 applies to uranium recovery. So more information is
12 forthcoming on that topic.

13 The next bullet is 2800, the Materials
14 Inspection Program. It was revised in 2020. But the
15 implementing procedures, the inspection procedures,
16 IPs as we call them, are currently being updated. And
17 I would expect that at some later date in the 2022
18 time frame, we may go back and update 2800 based on
19 the revised procedures, implementing procedures.

20 And finally 2600, fuel cycle facility,
21 operational safety and safeguards inspection program
22 was also reissued in January 2021.

23 So long story short is Manual Chapter 2800
24 procedures and 2602 are currently in the revision
25 process. And some of the other sister related

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 programs have just recently been reissued.

2 So the next slide is references. I kind
3 of briefly earlier talked about the charter, the State
4 and Tribal Communications Letter, Be riskSMART and
5 issues of low safety significance. If you have any
6 interest in more information, in learning about these,
7 we provide the ADAMS ML numbers for download for the
8 public.

9 So this is actually the end of the formal
10 presentation. So what I'll do is I'll turn it over to
11 Maurice, who will make a few comments before we open
12 it up for questions and comments. Thank you.

13 MR. HEATH: Thank you, Rob. And thank you
14 for everyone who put on the presentation today. This
15 is the point on the agenda where we're going to open
16 it up to anyone who has comments or questions.

17 I see one comment in the chat. But before
18 I get to that, I just want to mention that today if
19 there is a question that you have or maybe comes to
20 you after the meeting, I'm going to put my email into
21 the chat so all attendees can have a copy of my email
22 and then you can send a comment or question to me.

23 We will have a meeting summary that we
24 will issue in 30 days and if there are questions that
25 come that we can address that will be the place that

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 we can address some of those in our meeting summary.

2 With that, before we go to the line, I'm
3 going to read our first question that has come into
4 the chat. It says, is there a need for financial
5 assurance for decommissioning sites and do the
6 inspectors look at that? And I will turn that over to
7 Rob for response.

8 MR. EVANS: Yes. This is Rob. Let me
9 start and then I may pass it on to one of the other
10 individuals. But the answer is for financial
11 assurance for decommissioning, there are regulatory
12 requirements and license conditions for financial
13 assurance. The actual financial instrument itself is
14 managed more by license reviewers or program managers
15 than the inspectors.

16 But during inspections there will be
17 situations where we may try to verify certain
18 activities. Like for example if the licensee says
19 they need a certain amount of money to do a certain
20 amount of decommissioning, what we would do during
21 inspections is to -- is this correct? For example,
22 have they properly considered subsurface contamination
23 and the cost of excavating and remediating a
24 subsurface activity or maybe an area below the
25 building?

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 This financial assurance is required by
2 regulations in the license. It's usually a license
3 reviewer type of activity, but there are inspection
4 functions that we will review financial assurance on
5 a case-by-case basis.

6 MR. HEATH: All right. Thank you, Rob.
7 Does anyone else on the team have anything else to add
8 to it?

9 MS. DALZELL: Yes. This is Jenni Dalzell.
10 Just to add to that, the requirements for financial
11 assurance are based on the license. And so that does
12 continue throughout the whole decommissioning process.
13 It's not something that just goes away once the
14 licensee is no longer operating. It's maintained
15 until the facility has been decommissioned.

16 MR. HEATH: All right. Thank you,
17 Jennifer. At this time, I think we're going to start
18 to see -- Michelle, are there any questions or anyone
19 in the queue that would like to ask a question?

20 OPERATOR: Thank you. At this time if you
21 have any questions or comments, you may press star 1.
22 Please unmute your phone and state your first and last
23 name when prompted. If you would like to withdraw
24 your question, you may press star 2.

25 Again, that is star 1 if you do have any

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 questions. One moment, please. Once again, that is
2 star 1 if you do have any questions.

3 We do have a few questions. Nima, is it
4 Ashkeboussi? You may go ahead.

5 MR. ASHKEBOUSSI: Hi. Can you hear me?
6 Can you guys hear me?

7 MR. HEATH: Yes. We can hear you.

8 MR. ASHKEBOUSSI: I've got a couple
9 questions. But first I just want to say, you know,
10 kudos to this group for undertaking the effort to risk
11 inform the Inspection Program. I think it's really
12 critical at this time where we focus resources on the
13 activities that matter most to safety. And by the
14 way, I'm with the Nuclear Energy Institute.

15 And my first question, and I think, Rob,
16 you had a slide on benchmarking other activities. So
17 I just want to just check that, you know, NMSS has
18 done some great work in this area with Inspection
19 Manual Chapter 2600 and the associated IPs through the
20 Smarter Fuel Cycle Inspection Program.

21 So I just wanted to check to see if the
22 group had been engaged with that effort or reviewed
23 the insight from that update.

24 MR. EVANS: This is Rob. I can provide
25 you with sort of a broad answer. At the very

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 beginning of the working group, we did take a look at
2 that particular working group's activities and
3 results.

4 And it was kind of a starting point. And
5 it's not just that one. There was, like, four or five
6 other working groups that the information was kind of
7 fed into our project plan and something to get started
8 with.

9 But for that working group, it is -- some
10 of the information is going into our program. But
11 with regards to risk is we're adopting the Be
12 riskSMART approach as kind of an overarching primary
13 mechanism for making decisions, putting the procedures
14 together as well as the inspector making decisions
15 with regards to each individual inspection.

16 So long story short is we did take a look
17 at it. We took what we thought was useful for that
18 working group, but we're going in a slightly different
19 direction. But if you have specific examples or
20 suggestions, I would be more than happy to have you
21 email them to us by way of Maurice, and we will take
22 a look at them in detail.

23 MR. ASHKEBOUSSI: Okay. Great. Thanks.
24 I might do that. So my second question, and I think
25 it was on your next steps forward. There was, I

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 guess, a bullet on seeking external stakeholder
2 comments. I'm assuming that was directed toward
3 Agreement States or state and Tribal entities not the
4 public? Is that correct?

5 MR. EVANS: Rob Evans here. We actually
6 discussed this very concept early in the working
7 group. And we made the decision that we were going to
8 go with Agreement State comments, Agreement State
9 support but notifications to the public.

10 So, again we're always willing to accept
11 comments if you have any. But we decided against
12 having the public and the industry and licensees
13 involved in the procedure revision process.

14 We just kind of felt for various reasons
15 not to do that. And that's fairly consistent with
16 some of the other working groups, not all. Some of
17 the working groups did get the public involved but not
18 all of them did that. So we're kind of in the middle
19 of the groups. So long story short is we considered
20 it, but we chose not to go that route.

21 MR. ASHKEBOUSSI: Okay. So I guess
22 external non-state stakeholders will see the document
23 when it's final then. Is that right?

24 MR. EVANS: They will have an opportunity
25 to -- again, the second -- we will have another public

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 meeting to announce the program and to describe the
2 program. But we decided not to include them in the
3 development of the program since there are NRC
4 procedures that will be used by internal NRC
5 stakeholders as well as Agreement State people.

6 Now some of the other groups may have an
7 interest in how the program is put together, but they
8 would not necessarily be implementing the procedures.

9 MR. ASHKEBOUSSI: Okay. Thank you.

10 OPERATOR: Our next question comes from
11 Scott Murray. You may go ahead, sir.

12 MR. MURRAY: Hi, Rob. This is Scott
13 Murray, GE Hitachi. I guess I have a question for
14 Marti, maybe. I noticed, Marti, on Slide 17 you
15 described core inspection procedures developed for
16 each of four program areas. And one of those areas is
17 a fuel cycle facility.

18 I'm just curious because I thought there
19 already was an inspection procedure. I think it's
20 88104. It's been around for a couple of decades. But
21 I noticed it was not listed in the Inspection Manual
22 Chapter 2602.

23 Has that inspection procedure been idled
24 or is it going to be revised or are you generating a
25 new one for fuel cycle facilities? Can you help me

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 with that?

2 MS. POSTON-BROWN: Hi. This is Marti.

3 MR. EVANS: This is Rob.

4 MS. POSTON-BROWN: Oh, you want to take
5 it, Rob? That's fine.

6 MR. EVANS: No, no. Let me start and then
7 you can jump in. But the bottom line is we plan to
8 take 88104 and basically gut it and rebuild it. So
9 88104, we're going to keep the number. We're going to
10 keep the name. But it will be an all new procedure.
11 But we're not there yet.

12 MR. MURRAY: Yes, Marti, anything else to
13 add about 88104? I was just curious why it wasn't
14 listed on the list for the Inspection Manual Chapter
15 2602. Is that just an oversight do you think?

16 MS. POSTON-BROWN: At the time that we
17 made that list, we were undecided as to whether we
18 were going to re-do that one or just start with a
19 brand new one and a brand new number.

20 So we just kind of left it off semi-
21 deliberately shall we say? But we decided that we're
22 going to take it all the way down to the ground and
23 reuse the number.

24 MR. MURRAY: Okay. That helps. All
25 right. Thank you very much.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 OPERATOR: Thank you. And once again, if
2 you would like to ask a question, you may press star
3 1. Our next caller is Katie Sweeney. You may go
4 ahead.

5 MS. SWEENEY: Hi. This is Katie Sweeney
6 from National Mining Association. I just wanted to
7 say thank you for doing this presentation today. I
8 found it very interesting. I think risk-informed
9 inspections are just as important as risk-informed
10 regulations.

11 And, Rob, I just wanted to say yes, we
12 will accept your offer to present at the NMA Uranium
13 Recovery Workshop on both of inspection documents. So
14 I appreciate that offer, and we're going to take you
15 upon it. Thank you.

16 MR. EVANS: Oh, thank you, thank you.
17 Personally, I kind of wish it was in person so I could
18 take a nice fun trip up to Denver, but I'll still do
19 it virtually.

20 MS. SWEENEY: Well, next year, I promise,
21 we'll be back in person.

22 OPERATOR: Thank you. And once again,
23 that is star 1 if you do have any questions or
24 comments.

25 MR. HEATH: Michelle, this is Maurice. I

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 would like to take one of the written comments that we
2 have in the chat before we go back to the line if
3 that's okay.

4 OPERATOR: Thank you.

5 MR. HEATH: All right. The next question
6 we received in the chat is what defines complex or
7 non-complex materials or is this in the context of the
8 materials and site conditions based on a risk analysis
9 tool?

10 MR. EVANS: Yes. This is Rob. I'll start
11 on that one. And if anyone else wants to chime in,
12 that's great.

13 But this is a topic that we spent a lot of
14 time discussing. And the first thought was the
15 difference between complex and non-complex was presence
16 or absence of groundwater contamination.

17 But we kind of felt that that one really
18 didn't meet our needs. So the current definition or
19 difference between complex and non-complex is based on
20 decommissioning plans and classifications, NUREG 1757
21 classification.

22 So if a site has a decommissioning plan,
23 then it's considered a complex decommissioning
24 project. If it doesn't have a decommissioning plan,
25 then it's considered what we call a Group 2 project.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 And that would considered non-complex. So there's
2 different ways of looking at it.

3 There will be some minor exceptions but
4 public interest or congressional interest or something
5 like that. But in general if there's a
6 decommissioning plan, it's complex, which would
7 include sites with groundwater contamination.

8 MR. HEATH: Thank you, Rob. I want to go
9 to one more question in the chat before we go back to
10 the phone lines.

11 The next question is when or how will the
12 changes in the various IMCs be addressed as part of
13 the IMPEP process? I'll turn that over to Rob.

14 MR. EVANS: That was from Larry Camper.
15 And, Larry, greetings. Nice talking to you again.
16 And I'm afraid I'm honestly a little stumped by the
17 question. And I don't think I have a good solid
18 answer.

19 So we can either -- I can turn it over to
20 my panel if they think they can answer this one. Or
21 what we will do is take this question and then think
22 about it and then come back with an answer eventually.

23 MS. MUESSLE: Rob, I also am happy to jump
24 in here, at least conceptually, and if we need to --
25 if it doesn't answer, then we can look to get more.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 But in terms of part of -- IMPEP process
2 for those on the phone is the way that we work to do
3 a review of the State Program Materials Program or the
4 NRC's Materials Program. We're actually in the middle
5 of an impact review this week here with NRC's Material
6 Program.

7 We look at the date of the changes and so
8 if a new procedure goes into effect, then that would
9 be the timeline that we would be looking at the time
10 it would be in effect. But in my experience with
11 other things, like with IMC 2800, it was clear when we
12 should be following that Inspection Manual Chapter.
13 So during that review period is when, you know, that
14 it would seem reasonable that we would be following
15 it. But I'm not sure if that fully addresses what you
16 were asking.

17 MR. HEATH: All right. Thank you for the
18 response, Mary. And if that did not answer the
19 question fully, I would ask Mr. Camper to just put a
20 follow-up question in the chat. If we have time, we
21 can get back to it.

22 I'm going to read one more question from
23 the chat and then we'll go back to the phone lines.

24 The question is have there been or are
25 there any planned changes in the inspection process

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 for the low level waste disposal facilities?

2 (Simultaneous speaking.)

3 MR. HEATH: I'll turn that one over to Rob.

4 MR. EVANS: Yes. I can partially answer
5 the question. But I don't think I can completely
6 answer it. The Manual Chapter 2801, which is in the
7 final draft about to be issued within a couple of
8 weeks, it does address an 11e.(2) disposal facilities.

9 But if you're talking about, like, low
10 level waste facilities that are managed by the states,
11 like, let's say like the one in Texas and other
12 locations, that's not within our scope of activities.
13 But you're asking are there inspection procedures for
14 low level waste disposal facilities?

15 And I would have to get back to you on
16 that one. That's another one that I would have to do
17 more research on.

18 MS. HOLAHAN: And, Rob, if I can add to
19 that. This is Trish Holahan. I would say we do have
20 inspection procedures for low level waste disposal
21 facilities. But as Rob indicated, most of the --
22 well, all of the disposal facilities are currently in
23 Agreement States. So we would have to look carefully
24 at the Agreement States, whether they feel a need to
25 revise them.

1 MR. HEATH: This is Maurice. Just to
2 follow on with what Trish said that there are
3 inspection procedures. But we also talked earlier in
4 one of the slides about some of the discretionary IP
5 looking at radioactive waste management.

6 And there are some other discretionary IPs
7 that may come into effect. And we haven't gotten to
8 the point where we have identified some areas that may
9 be needed to revise in that area. So it's a little
10 early for us to make a definitive answer if there is
11 something that may touch on some of the low level
12 waste disposal facilities.

13 With that, Michelle, do we have anybody on
14 the line that would like to ask a question or have a
15 comment?

16 OPERATOR: So once again, if there are any
17 comments or questions, you may press star 1. Sir, at
18 this time, I'm showing no further questions.

19 MR. HEATH: All right. We do have two
20 more questions in the chat so I'll start with the
21 first one.

22 A Financial Assurance Working Group
23 provided a number of recommendations in a report last
24 April. Have they or when will they be ultimately
25 addressed within the IMC updates?

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 MS. HOLAHAN: I'll take this question,
2 Rob. The Financial Assurance Working Group Report was
3 specific to power reactors. And we have incorporated
4 the changes that we recommended in IMC 2561 as well as
5 other guidance changes. We're still working on those,
6 but it was specific to financial assurance to power
7 reactors.

8 MR. HEATH: All right. Thank you, Trish.
9 We have one more question in the chat I'd like to go
10 through. And isn't there some advantage for vendors
11 to comment on the procedure for new technologies that
12 can be or are being used for decommissioning
13 activities? And I'll turn that one over to Rob.

14 MR. EVANS: Thank you. Thank you. And
15 I'm afraid I'm sort of stumbling with an answer. My
16 earlier response is that part of the problem with the
17 working group is we don't know what some of these new
18 -- we know what is currently available, like with say,
19 ISOCS, in situ gamma measuring systems. So we can
20 incorporate that into our inspection program.

21 But newer technologies that are coming
22 down the road, we have ideas, but we don't really know
23 how to address them in the procedure. So we're not at
24 the point where those words have been formulated.

25 An example would be is there's some

1 indications that future outdoor surveys may be
2 conducted by drones. So how would we inspect
3 something like that? Well, we haven't really sat down
4 and talked about it or discussed it. So this is kind
5 of a tricky one.

6 My crystal ball is a little fuzzy on what
7 the future is going to hold. But if you have any
8 suggestions of possible technologies, new
9 technologies, being used in decommissioning, please
10 let us know about them to make sure they're on our
11 radar screen. But actual vendors commenting on the
12 procedure is -- again, we had chosen not to do that.
13 But we are quite interested in the information. But
14 I do appreciate the comment.

15 MS. POSTON-BROWN: If I can chime in, Rob,
16 this is Marti. I think that it's hard to address
17 emerging technologies in an inspection procedure. So
18 there are going to be some situations where we're just
19 going to have to leave it up to the discretion of the
20 inspector on how they want to evaluate that emerging
21 technology or new technology to make sure that it
22 appropriately identifies the risk and tries to
23 mitigate the hazards.

24 We can incorporate some language
25 associated with emerging technologies. But I don't

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 personally feel like there's a real advantage to
2 finding out what all the things are coming down the
3 pike because then we might have to do that every two
4 or three years to see what new survey technique or
5 sampling technique is coming down the road.

6 And I'd really like to leave it up to the
7 discretion of the inspectors in the future to address
8 those as those technologies develop. That's just my
9 personal opinion.

10 MS. MUESSLE: So, Rob, I'd like to add on
11 a little here. We've had a couple of questions about
12 going out to stakeholders outside of the Agreement
13 States for actual procedure or guidance comments,
14 which is really contrary to the way that we ran our
15 oversight program here.

16 We do want perspectives. We get
17 perspectives and then we try to put together the
18 correct oversight for those. So I think as Rob had
19 said, if there are specific perspectives that could
20 inform us as we draft and review those with our co-
21 regulators in the agreement states, we are looking to
22 gather that input.

23 So the procedures that we write
24 specifically to oversee those we hold as an in-house
25 function.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 MR. HEATH: Thank you, Mary. I just want
2 to also give an update. If there are, and we just
3 talked about individuals, and if they wanted to
4 provide any additional information, I put my email in
5 the chat, maurice.heath@nrc.gov. That's M-A-U-R-I-C-E
6 dot H-E-A-T-H @nrc.gov. Please feel free to send me
7 if you have additional information or as we discussed
8 earlier if you have a question that we may not get to,
9 please feel free to send me an email.

10 With that, I would like to turn to
11 Michelle to see if there's anybody else on the phone
12 lines that would like to make a comment or have a
13 question.

14 OPERATOR: Thank you. We do. And as a
15 reminder, that is star 1 if you would like to ask a
16 question. Larry Camper, you may go ahead, sir.

17 MR. CAMPER: Can you hear me?

18 MR. HEATH: Yes, we can.

19 MR. CAMPER: Okay, good. Well, thanks for
20 your presentations and thanks for answering my
21 questions.

22 I found the last discussion a bit
23 intriguing in terms of what to do about emerging
24 technologies. And you made some very good points
25 because it's changing so fast. But probably one of

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 the things that I've found most interesting of late is
2 the increasing use of drones mounted with Geiger-
3 Muller detectors for detecting radiation fields and
4 being planned in the use of decommissioning for
5 example.

6 And so I think that's an area where as
7 time marches on you will want to take a look at the
8 calibration processors, how drones moving about are
9 able to measure radiation fields at various distances
10 and changing distances and how that all winds up in
11 with the validity and the accuracy of the resulting
12 inspection performed by drones.

13 It's a very interesting technology, very
14 useful technology. It's happening right now. And
15 it's being used very constructively. But I do think
16 from a regulatory standpoint if I look at Geiger-
17 Muller's changing detection distances, you know, basic
18 physics kinds of things, it is an area that you're
19 probably going to want to take a look at as time
20 marches on down the road. Thank you.

21 MR. HEATH: Thank you, Larry, for your
22 comments. Do we have anybody else on the phone line,
23 Michelle?

24 OPERATOR: At this time, I'm showing no
25 further questions, sir.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 MR. HEATH: Well, just to reiterate, I
2 just put my email in the chat for everybody in case
3 you do have a question or any follow-up information
4 you'd like to provide to our working group. I'll just
5 wait to see if anybody else has a question or anybody
6 else on the panel had anything that they would like to
7 address.

8 OPERATOR: And once again, if you do have
9 any questions or comments, you may press star 1. I am
10 showing no further questions on my end, sir.

11 (Simultaneous speaking.)

12 MR. EVANS: This is Rob. I just wanted to
13 provide a couple of summarizing comments. I
14 appreciate everyone's time and participation today,
15 both the panel as well as those that called in or came
16 into the Webex. I greatly appreciate everything.

17 We're still putting the procedures
18 together. If you have information, we'll take that
19 information and add it to the project plan and
20 consider it as part of the inspection procedures
21 themselves.

22 As I had mentioned earlier our plan is to
23 have the draft procedures that are ready to go to
24 review by the end of August or September time frame.
25 Now we were mulling around the idea of how we're

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 actually going to sort of dry run and test the
2 procedures either through tabletop exercises or maybe
3 even going out to a couple of sites.

4 And I have a few in mind where we can take
5 the procedures and then just sort of use them and kind
6 of debug them during an actual inspection.

7 And then the next step in the whole
8 process is to actually implement all comments and get
9 them out by the end of this year or early next year.

10 And as I had mentioned again is that I do
11 plan to host -- we plan to host another public meeting
12 about that time and then we'll give you all the so-
13 called gory details of what the procedures look like
14 and how they will impact licensees going forward into
15 the future. So long story short, there's more to
16 come.

17 So any other final comments from anyone on
18 the panel?

19 MR. HEATH: I guess, Michelle, is there
20 anybody on the phone lines before we close out the
21 meeting?

22 OPERATOR: At this time --

23 MS. HOLAHAN: I'd just like to reiterate
24 our thanks to the working group who is doing a
25 yeoman's job of risk informing these procedures as

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 well as the members of the public that ask good
2 questions. And I appreciate all the input we've
3 gotten.

4 OPERATOR: And at this time, I'm showing
5 no further questions, sir.

6 MR. HEATH: Okay. Thank you, Michelle.
7 With that, again, thank you for everyone who is
8 participating via Webex or on the phone line. We
9 appreciate your input. And as we go about this
10 process, bear with us.

11 As Rob laid out our timetable, I realized
12 some dates could change. But we will keep you
13 informed.

14 And also, if you have any follow-up or you
15 didn't get your questions or you need answered maybe
16 or you thought of a question later on this afternoon,
17 please feel free. My email is in the chat. And I'd
18 like to thank you for participating today. And with
19 that, we will close the meeting for today. Thank you.

20 OPERATOR: And thank you. This concludes
21 today's conference call. You may go ahead and
22 disconnect at this time.

23 (Whereupon, the above-entitled matter went
24 off the record at 2:16 p.m.)

25