

# PUBLIC SUBMISSION

<b>As of:</b> 7/27/21 3:31 PM
<b>Received:</b> July 21, 2021
<b>Status:</b> Pending_Post
<b>Tracking No.</b> krd-tq5v-8k9v
<b>Comments Due:</b> July 21, 2021
<b>Submission Type:</b> Web

**Docket:** NRC-2018-0300  
Categorical Exclusions from Environmental Review

**Comment On:** NRC-2018-0300-0001  
Categorical Exclusions from Environmental Review

**Document:** NRC-2018-0300-DRAFT-0009  
Comment on FR Doc # 2021-09675

---

## Submitter Information

**Name:** Anonymous Anonymous  
**Email:** mwinters@cabreraservices.com

---

## General Comment

See attached file(s)

---

## Attachments

20210721\_CatExc\_Commt

Commenter requests categorical exclusion for the activities of commercial radiological support/D&D service provider licensees, who receive, store, use, and/or otherwise possess materials at a temporary job sites that are under the customer's license or are not covered by any active license.

The following is a list of specific actions to which categorical exclusion is requested for specific consideration:

- (1) Decontamination, decommissioning, and remediation of facilities and grounds, equipment, and containers;
- (2) Site characterization;
- (3) Solidification and treatment of wastes associated with (1) or (2);
- (4) Packaging for transport associated with (1), (2), or (3);
- (5) Transport in packages or containers approved for use under the provisions of 10 CFR 71, for transport to licensees authorized to receive the materials in accordance with the terms and conditions of licenses issued by the NRC or Agreement States or;
- (6) As calibration and reference standards for operational testing of radiation detection instruments.

The commenter asserts that is likely, and possible demonstrated by NRC experience, that any environmental reviews conducted for the service provider licensee activities noted above would almost certainly result in a FONSI.

If radioactive materials at a temporary job site and the work required the owner-licensee to prepare a decommissioning plan, any environmental reviews/reports would be associated with NRC approval of that plan. The subsequent activities of a services providers to support decommissioning would be conducted in accordance with that Plan (as directed by the owner-licensee) or using service provider licensee procedures provided, those procedures do not include any actions identified in 10 CFR 51.60(b). Refer then to earlier statement regarding NRC experience with environmental reviews associated with service provider licensees.

Service provider licenses typically include minimum 14-day notification requirements prior to the start of licensed activities. The information included with the notification provides sufficient detail for the NRC reviewer to assess the potential for the planned work to be covered by a DP that was previously undisclosed to the service provider licensee and/or to confirm that the planned work are inconsistent with those listed in 10 CFR 51.60(b).