

From: [Snyder, Amy](#)
To: [NMSS DUWP Admin Resource](#)
Subject: FW: RE: NYSERDA RPP Amendment Administrivia
Date: Monday, November 1, 2021 7:12:50 AM

Also, add this email to the package please.

Thank you

A

From: Bembia, Paul J (NYSERDA) <Paul.Bembia@nyserda.ny.gov>
Sent: Monday, September 13, 2021 8:56 AM
To: Longmire, Pamela <Pamela.Longmire@nrc.gov>
Cc: Chapman, Greg <Gregory.Chapman@nrc.gov>; Dean, Janice A (NYSERDA) <Janice.Dean@nyserda.ny.gov>; Mellon, Andrea L (NYSERDA) <Andrea.Mellon@nyserda.ny.gov>; Cray, Daniel M (NYSERDA) <Daniel.Cray@nyserda.ny.gov>; Dueringer, Alita M (NYSERDA) <Alita.Dueringer@nyserda.ny.gov>; Doell, Marlayna <marlayna.doell@nrc.gov>
Subject: [External_Sender] RE: NYSERDA RPP Amendment Administrivia

Pamela,

In response to the proposal from NRC in the September 3, 2021 email (below) to add an additional condition to License CSF-1 through the current License Amendment Request (LAR) process, NYSERDA provides below a slight modification to the language proposed by NRC. The language NRC proposes states that NRC will approve a revised RP-RPP, while under the current approval framework, the RP-RPP is reviewed by NRC as part of the supporting documentation for the LAR, but is approved by the NYSERDA Retained Premises Radiation Safety Committee. The modified language proposed by NYSERDA is consistent with this approval framework and assumes another License Amendment will be required prior to NYSERDA assuming responsibility for any part of the WVDP Premises that is presently under the possession of DOE. NYSERDA proposes the following:

(5) Prior to assuming responsibility of any of the WVDP facilities or site areas (when the U.S. Department of Energy returns oversight of the WVDP to NYSERDA), NYSERDA will submit to NRC a License Amendment Request that will include, as appropriate, an updated Radiation Protection Plan.

Please let me know if the proposed language is acceptable to the NRC.

Thanks,
Paul

From: Doell, Marlayna <marlayna.doell@nrc.gov>
Sent: Friday, September 3, 2021 6:22 PM
To: Bembia, Paul J (NYSERDA) <Paul.Bembia@nyserda.ny.gov>
Cc: Longmire, Pamela <Pamela.Longmire@nrc.gov>
Subject: RE: NYSERDA RPP Amendment Administrivia

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Hi again!

One more query and then I think I am really done: would NYSERDA consider consenting to an additional bullet being added to the proposed license condition for the RPP, as highlighted below? I think even though we all know that you will not take back over the WVDP without updating the NYSERDA site documents appropriately, it seems prudent to make it extra clear if we can.

E. Retained Premises Radiation Protection

- (1) As the sole licensee under provisional operating license CSF-1 for the Retained Premises [i.e., the non-West Valley Demonstration Project (WVDP), non-State Licensed Disposal Area (SDA) portions of the Western New York Nuclear Service Center (WNYNSC)], NYSERDA provides for radiation protection in accordance with NRC regulation 10 CFR Part 20: Standards for Protection Against Radiation and in keeping with the ALARA (As Low As Reasonably Achievable) philosophy.
- (2) NYSERDA will implement a Retained Premises Radiation Protection Plan (RP-RPP500) to keep doses to workers and the public both ALARA, and in compliance with the 10 CFR Part 20 requirements for radiation protection.
- (3) For activities performed within the Retained Premises, the requirements and procedures described in RP-RPP500 supersede and replace radiation protection program requirements described in the Final Safety Analysis Report (FSAR) referenced herein.
- (4) RP-RPP500 and the associated procedures will be maintained in accordance with the requirements in 10 CFR Part 20, Subpart B, Radiation Protection Programs. Changes to RP-RPP500 or associated procedures will be documented, reviewed and approved by the licensee's Radiation Safety Committee prior to implementation.
- (5) NYSERDA will review, revise as appropriate, and submit for NRC approval before implementation, an updated Radiation Protection Plan prior to assuming responsibility of any of the WVDP facilities or site areas (when the U.S. Department of Energy returns oversight of the WVDP to NYSERDA).

Please let me know if this would be acceptable, and if you have any proposed edits that is fine too! Since we have to have confirmation on the docket that the licensee accepts any license conditions being proposed, if you want to just wrap this discussion in with the information requested on 8/27 I (or Pam!) can have everything added to ADAMS and we will be set. Let me know if you have any comments or concerns in the meantime...I am still around until you get my out of office message

Thanks and have a great weekend!
Marlayna

301.415.3178

Marlayna Vaaler Doell

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