

Saxton, John

From: Smith, James
Sent: Monday, November 29, 2021 10:46 AM
To: Lux, Jeff J
Cc: Halliburton, Bill; Saxton, John; Pineda, Christine; Burrows, Ronald; Pinkston, Karen; Von Till, Bill; McKenney, Chris
Subject: RE: RE: Files Uploaded to the NRC Information Response Team
Attachments: James Smith.vcf

Thanks Jeff-

Again this is all voluntary on your part so that we can be sure that there won't be any gaps resulting in a non-acceptance letter.

Jim



From: Lux, Jeff J <jlux@burnsmcd.com>
Sent: Monday, November 29, 2021 10:37 AM
To: Smith, James <James.Smith@nrc.gov>
Cc: Halliburton, Bill <bhalli@burnsmcd.com>
Subject: [External_Sender] RE: Files Uploaded to the NRC Information Response Team

Jim, as we discussed on the phone, it was my understanding that the purpose of this audit was to identify any gaps in our responses to your requests for information that would result in a non-acceptance letter, saying we need to provide yet more information before the NRC can initiate the technical review of the decommissioning plan (DP). Perhaps I has an over-simplified understanding of the process, but I thought the NRC would review our responses to your requests for information.

In some cases, we thought the response to a request for information resulted in numerous changes in the text of the DP, such as removing references to a phased remediation, eliminating treatment for nitrate, etc. For these responses, we simply stated that the changes were present throughout the DP.

In some cases, we thought the response should not be addressed directly in the DP. For instance, it would not be practical to include the comprehensive analytical data set and the soil boring logs and monitor well installation diagrams for the hundreds of well that are or had been present at the site. That information was provided to the NRC separately. Some of the information was summarized in tabular form in new tables in the DP.

Requests for information related to radiation protection were addressed in the radiation protection plan, which is Appendix M to the DP.

Changes to many of the figures and tables provided for the audit were made not to respond to the NRC's request for information, but because the revisions to the DP were so significant that the DP received a new revision number.

It was my understanding that if NRC reviewers believed that we had not adequately responded to a request for information, we would be able to fill in any gap before formally submitting the DP. The result of adequately responding to all those requests for information would then mean that the NRC would complete the acceptance review of the DP and the next set of requests for information would be RAIs based on the technical review of the DP.

I do not understand why a reviewer would need a list of changes to determine if we provided the information the NRC requested. Nevertheless, I will provide a list of figures and tables that represent changes "of substance" if that would help. I will not include figures or tables for which the changes were "editorial", like changing the rev number, correcting spelling errors, fixing borders on tables for which the information in the table didn't change, etc.

I also did not include in the files on the Microsoft TEAMS site those appendices that were not changed, as there were no requests for information related to those appendices. I will be happy to upload any appendices that the NRC requests to the Microsoft TEAMS site at your request.

Jeff Lux
405-642-5152

From: Smith, James <James.Smith@nrc.gov>
Sent: Monday, November 29, 2021 8:47 AM
To: Lux, Jeff J <jlux@burnsmcd.com>
Subject: FW: Files Uploaded to the NRC Information Response Team

Jeff

I got a request from one of the reviewers.

"I am not sure what has changed on some of the figures – e.g. Figure 3.6. I could spend hours trying to identify. Jeff should provide a list of the changes, similar to most engineering firm's change blocks for their drawings.
I didn't see Appendix I, appendix J or the DP text."

I responded

"As far as the changes to some of the figures – e.g. Figure 3.6. I'll ask Jeff if he is willing provide a list of the changes, similar to most engineering firm's change blocks for their drawings. However, it's my understanding with the audit process is voluntary and they can provide whatever they want audited and that we can't officially request anything, except during a public meeting."

I.e., you don't have to provide a list of changes, or any Appendices or the DP Text, unless you want to have it included in the audit.

Thanks

Jim



From: Lux, Jeff J <jlux@burnsmcd.com>

Sent: Monday, November 22, 2021 9:43 PM

To: Smith, James <James.Smith@nrc.gov>; Burrows, Ronald <Ronald.Burrows@nrc.gov>; Pineda, Christine <Christine.Pineda@nrc.gov>; Pinkston, Karen <Karen.Pinkston@nrc.gov>; Saxton, John <John.Saxton@nrc.gov>; J. Paul Davis <j.paul.davis@deq.ok.gov>; mike.broderick <mike.broderick@deq.ok.gov>

Cc: Halliburton, Bill <bhalli@burnsmcd.com>; Hesemann, John <hesemann@burnsmcd.com>; Jay Maisler <jmaisler@enercon.com>; Earl Lloyd <earl.lloyd@vnsfs.com>

Subject: [External_Sender] Files Uploaded to the NRC Information Response Team

This evening I uploaded all the files needed for the NRC to review our response to the NRC's August 11, 2021 request for information. Responding to the requests for information involved a complete revision of the text, figures, and tables of the decommissioning plan, as well as Appendix I, "Remediation Infrastructure Design Drawings", Appendix J, "Groundwater Treatment System Design Drawings", and Appendix M, "Radiation Protection Plan".

There were far too many drawings or figures to compile into single files, so Appendices I and J, and the figures were all placed in folders in the NRC Information Response Team site. The decommissioning plan text and tables, as well as Appendix M, could all be uploaded as single files.

Note: Section 16, "Financial Assurance" and Tables 16-1 through 16-4 (which present cost estimates) will undergo continuing revision as the costs for calendar year 2022 will be revised to conform to the budget for 2022 which is still being prepared.

The decommissioning plan and the radiation protection plan are being submitted informally on this site as draft documents. Rev 3 of the decommissioning plan may be further revised based on NRC's review of our response to their request for information, but I believe they will not be so significant as to require another "revision". It is our intent to further revise Rev 3 as needed based on the NRC's detailed technical review of the decommissioning plan, and the "final" Rev 3 will be the revision that is eventually referenced in the license amendment that authorizes us to proceed to construction and operation of groundwater remediation facilities.

*Jeff Lux, P.E.
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