

RAI Response	Clarification Requested	Response
Proposed Action – 1	Clarify the process used in determining the final disposal site for processed wastes.	<p>Based on the waste generator origin location (i.e. state) the waste will follow the Waste Compact Attribution process to determine what site the waste will be designated to.</p> <p>For DOE waste it will be limited to facilities that can accept DOE waste. When there is more than one disposal facility option the generator will communicate their preference which the MVF management may or may not honor based on case-by-case determination. In the end the waste must meet the receiving facilities waste acceptance criteria.</p>
Proposed Action – 3	Clarify where the water wastes would be received from, and how processed at the MVF and where transported to for final disposition.	<p>Expected water wastes would be received from nuclear power plant decommissioning projects. USEI has received lightly contaminated waters from the Vermont Yankee decommissioning project as a result of the plant losing its ability to discharge waters being stored in its torus and in other plant equipment. We expect situations like this to continue to occur in the future. Waters received at USEI are brought into the treatment basins, solidified with clay and disposed in the landfill as soil-like materials.</p>
Proposed Action – 4	<p>Provide examples of the hand tools that would be used.</p> <p>Clarify if the heavy equipment (forklift, excavator, crane) would be kept at the MVF site or leased as needed.</p>	<p>Bulk gondola rail shipments received at the RTF/MVF are primarily unloaded with an excavator. Residual materials left in the railcars that are unable to be retrieved by the excavator bucket are removed by the technician's using shovels and brooms.</p> <p>Heavy equipment used at the USEI RTF include excavators, fork trucks, a large intermodal picker, and occasionally a crane for heavy or large debris. All equipment except the crane are</p>

		owned by US Ecology. Cranes are rented on an as-needed basis.
Alternative – 2	Clarify if USEI would continue to use the site for its needs, and if so, clarify the expected level of USEI's use.	It is desired that the MVF retain a portion of its non-radiological capabilities for USEI use on an as needed basis. For example, offload of rail tankers containing hazardous and non-hazardous liquids into tanker trucks. These operations would only occur after the MVF had been appropriately released by Qal-Tek from being a radiation control area (RCA). Temporarily approved for unrestricted use.
Land Use – 1	Provide a legend for the map or provide additional information to clarify the land use shown in the map.	Local county planning and zoning information to augment the original response to the NRC RAI on "Historical and Cultural Resources." The local land use and zoning information for Ada County, Idaho can be found at https://gis.adacounty.id.gov/apps/whereami/ , which is an on-line, interactive GIS database of planning and zoning information. A screenshot of the website is provided below along with a marker for the MVF location.
Transportation – 1	Provide the reason(s) for the same volume of drum waste in the table for the five years shown.	The volumes of waste in the Table were derived from market analysis and expected customer shipments that the MVF is expected to receive. The number of 55-gal drum shipments was conservatively estimated at 100 per month from all generators.
Water Resources – 1 Ecological Resources – 1	Clarify the changes to be made to the site to accommodate the planned MVF activities (i.e., for administrative needs, redeployment of existing structures).	Use of the term "redeployment" in the original RAI response meant the original East RTF building structure would be kept and utilized as part of the new 'MVF.' The modular office trailers outside the steel structure of the RTF east building are all being replaced with new units. These will be used as the MVF administrative offices and the transition point between the RCA and "clean areas" of the site.

		Chain link fencing will also be replaced as needed.
Historical & Cultural – 1	Clarify if Qal-Tek’s planned activities would fall under the Elmore County conditional use permit granted to USE-I or if Qal-Tek would need to seek a new conditional use permit for its activities.	The planned licensed activities at the MVF do qualify under the currently approved uses as defined in the USEI Conditional Use Permit with Elmore County, Idaho.
Socioeconomics – 1	Clarify number of full-time employees expected at MVF (text and organizational chart don’t match).	The number of full-time employees at the MVF will be 6-8, not the 4-6 as noted in the original RAI response. The organizational chart is correct.
Public & Occupational Health – 1	Clarify if Qal-Tek’s planned use of active and passive air sampling would be in lieu of USEI’s air permitting exemption from the State of Idaho.	The planned active and passive air monitoring at the MVF is not “in lieu” of the air permitting exemption from the State of Idaho. The air permitting exemption confirms that the modeled scenarios for fugitive dust emissions of airborne radioactive materials from the MVF do not meet the minimum criteria for engineered or administrative atmospheric controls. The mention of the air permitting exemption was intended to clarify that an installed air handling and filtration system is unnecessary at a facility like the MVF. Qal-Tek will perform active and passive air monitoring regardless of this point. Data collected from the air sampling will be used for personnel dosimetry and environmental program monitoring and reporting purposes.
Public & Occupational Health – 2	Clarify definition for “Controlled Storage Area” as application currently only has “Controlled Area” definition.	The “controlled area” in the application is meant to be general in accordance with the NRC delineations of the different security terms in 20.1003. So whether it’s stated as controlled storage area or radiation controlled area (RCA) they mean the same thing and will be administered in the same fashion to comply with the security measures in 20.1801 and 20.1802.

Waste Management – 1	Clarify the process to be used in determining the final disposal location for residual wastes at the MVF.	Based on the waste generator origin location (i.e. state) the waste will follow the Waste Compact Attribution process to determine what site the waste will be designated to. For DOE waste it will be limited to facilities that can accept DOE waste. When there is more than one disposal facility option the generator will communicate their preference which the MVF management may or may not honor based on case-by-case determination. In the end the waste must meet the receiving facilities waste acceptance criteria.
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Land Use 1 Map with Legend

