



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
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September 20, 2023

MEMORANDUM TO: Jared Heck, Director
Division of Radiological Safety and Security

THRU: David Hills, Chief *David E. Hills* Signed by Hills, David
Decommissioning, Reactor, and ISFSI HP Branch on 09/20/23

FROM: Bill Lin, Health Physicist *Bill Lin* Signed by Lin, Bill
Decommissioning, Reactor, and ISFSI HP Branch on 09/20/23

SUBJECT: QUALITY REVIEW OF DECOMMISSIONING LICENSING ACTIONS

A. Executive Summary

On August 07, 2023, the Decommissioning, Reactor, and ISFSI HP Branch (DRIHP) completed a self-assessment of decommissioning licensing actions to verify that members of the DRIHP staff were classifying licensing actions, and amending or terminating materials licenses according to the guidance in NUREG-1757 "Consolidated Decommissioning Guidance", completing environmental reviews in accordance with NUREG-1748 "Environmental Review Guidance for Licensing Actions Associated with NMSS Programs", and the regulatory requirements.

Although there were several decommissioning activities under branch oversight including license amendment requests under review, no license amendments were issued during the assessment period. Hence, there were no instances in which a location had been inappropriately removed from the license. The self-assessment concluded that the materials decommissioning licensing process was being implemented very well in that DRIHP staff were performing licensing activities appropriately and in accordance with the guidance in NUREG-1757, NUREG-1748 and the regulatory requirements. In particular, for each of the outstanding license amendment requests, the Region III license reviewers had begun implementing lessons learned from the 2022 materials decommissioning licensing assessment. Considerable staff efforts and interaction aimed at providing additional structure to processes and transparency in decision making, as well as to provide better coordination of decommissioning licensing actions among the branches, culminated in a draft divisional instruction to solidify associated expectations. That divisional instruction was in the concurrence process. Additional activities to support that roll-out including training for staff were being planned.

During the conduct of the assessment, the staff proved very helpful, being objective, non-defensive, and self-critical. They all were very receptive to the interviews and actively participated in discussions to accurately characterize activities. Overall, the involved DRIHP staff demonstrated tremendous receptivity to change and actively drove that effort.

Background

A planned self-assessment was conducted to evaluate the decommissioning licensing process as implemented by DRIHP. This is an annual review that is performed to determine if staff licensing reviews are being conducted in accordance with the appropriate guidance documents and regulations and whether the documentation of these reviews is adequate. This is a required assessment in the Region III Performance Plan.

B. Assessor

Bill Lin, Health Physicist, DRIHP

C. Scope of Review

This assessment reviewed the decommissioning licensing actions completed by DRIHP staff between October 1, 2022, and August 07, 2023. Over the review period, there were seven licensing actions outstanding, and no licensing actions had been completed. The reviewer discussed the status of each licensing action with the assigned reviewers and several of the outstanding licensing actions requests had been docketed at different times during the assessment period. All records that could be retrieved from the Agencywide Documents Access and Management System (ADAMS) related to the licensing actions were reviewed.

D. Findings and Recommendations

The assessor determined that DRIHP Materials Decommissioning Licensing Project Managers (PM) performed decommissioning licensing actions in a timely manner using current regulatory guidance including NUREG-1757, NUREG-1748 and DRIHP's Project Manager Procedure (PMP). The PMs documented their preliminary technical basis and conclusions using the DRIHP licensing review checklist and the assessor found their technical reviews to be thorough, complete, and of high quality with health and safety issues properly addressed.

The assessor also reviewed the implementation of the recommendations from last year's assessment. A new divisional instruction had been developed and was in the concurrence process that addressed Recommendations 2, 4, 5, 6, and 7. Recommendation 1 was partially addressed by that divisional instruction, although the Materials Decommissioning Program Lead (MDPL) was still working on revising and transforming the branch's PMP into an additional divisional instruction. Recommendation 3 was completed as an independent effort. Further, the assessor determined that staff had already begun to reflect related lessons learned into their licensing activities. For example, the assessor found that the materials license reviewers had started to use the new updated licensing checklists during the 2023 assessment period. The checklists were more readily available and easier to locate.

Further, the PM, focusing on transparency in decision making, benchmarked acceptance review practices through discussion with NMSS license reviewers and against NMSS procedures while performing the University of Missouri Pickard Hall decommissioning plan acceptance review. The PM also opted to complete an optional, but rather extensive acceptance review checklist, and walk the branch chief through that to provide assurance that the licensee had appropriately addressed all the pertinent areas. For the upcoming 2024 assessment, the assessor determined that a broader review of the licensing actions can be performed because several outstanding licensing actions were completed just after the 2023 assessment period.

There are no new findings or recommendations for this self-assessment.

E. Conclusion

The self-assessment concluded that DRIHP staff were implementing decommissioning licensing activities in accordance with NRC guidance and regulatory requirements. The Branch is in the process of implementing several recommendations for improved DRIHP performance related to the decommissioning licensing activities performed by DRIHP staff.

F. Performance Standards Considered

1. Regional Procedure RP-4.8, "Self-Assessing Process," dated March 22, 2018
2. Quality Review of Decommissioning Licensing Actions, September 22, 2021, ML21264A033
3. Quality Review of Decommissioning Licensing Actions, September 27, 2022, ML22269A559
4. NUREG-1757, Vol. 1, Rev. 2, "Consolidated Decommissioning Guidance - Decommissioning Process for Materials Licensees - Final Report," September 2006
5. NUREG-1748, "Environmental Review Guidance for Licensing Actions Associated with NMSS Programs," August 2003
6. MCID Branch, "Review Checklist and Certification Document," dated September 30, 2020, maintained by MCID Senior Health Physicist

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ADAMS Accession Number: ML23263B084

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