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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

OCT 22 1999

Advanced Technologies and Laboratories International, Inc.  
Attn: Ms. Ray-way Hwang  
20521 Century Blvd., Suite 200  
Germantown, MD 20874

SUBJECT: TASK ORDER NO. 3 UNDER CONTRACT NO. NRC-02-98-009  
UPDATE REG GUIDE 3.13

Dear Ms. Hwang:

In accordance with Section G.5, Task Order Procedures, of the subject contract, this letter definitizes Task Order No. 3. This effort shall be performed in accordance with the enclosed Statement of Work.

Task Order No. 3 shall be in effect from October 20, 1999 to June 30, 2000. The total cost plus fixed fee for this task order is \$21,207, in which the amount of \$20,007 represents the reimbursable costs, and the amount of \$1,200 represents the fixed fee. Funds in the amount of \$21,207 are obligated to fully fund this task order.

Accounting data for this task order is as follows:

B&R No.: 05015201105  
BOC: 252A  
FIN No.: J5248  
APPN No.: 31X0200  
FFS: 5000R010  
OBLIGATED AMOUNT THIS ACTION: \$21,207

The following individual(s) are considered to be essential to the successful performance of the work hereunder:

Jou Hwang

The Contractor agrees that such personnel shall not be removed from the effort under the task order without compliance with Contract Clause H.2, Key Personnel.

Your contacts during the course of this task order are:

Technical Matters: Donna Umbel - Project Officer  
301/415-7819  
Sean Soong - Task Order Technical Monitor  
301/415-8155

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Any contractual matters should be referred to me on 301/415-8168. The issuance of this task order does not amend any terms or conditions of the subject contract. Please indicate your acceptance of this task order by having an official who is authorized to bind your organization, execute three copies of this document in the spaces provided below and return two fully executed copies to me. You should retain the third copy for your records.

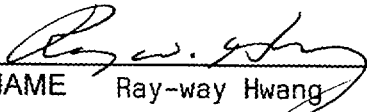
Sincerely,

  
Stephen M. Pool, Contracting Officer  
Division of Contracts and  
Property Management

Enclosure:

As stated

ACCEPTED T.O. #3 NRC-02-98-009

  
\_\_\_\_\_  
NAME Ray-way Hwang  
\_\_\_\_\_  
TITLE Chief Financial Officer  
\_\_\_\_\_  
DATE 10/25/99  
\_\_\_\_\_  
DATE

## TASK ORDER STATEMENT OF WORK

TO# 3<sup>4R</sup>

**PROJECT TITLE:** Update and Develop Guidance for Fuel Cycle Facility Licensing --  
Criticality and Radiation Safety  
**TASK TITLE:** Update Regulatory Guide 3.13, Guide for Acceptable Waste  
Storage Methods at UF<sub>6</sub> Production Plants  
**JOB CODE:** J5248  
**NRC OFFICE/DIVISION:** Nuclear Material Safety and Safeguards (NMSS)/FCSS  
**NRC PROJECT OFFICER:** Donna Umbel (301) 415-7819  
**NRC TECHNICAL PROJECT  
MANAGER:** ~~Michael Adjodha~~ (301) 415-8147 SP  
Sean Soong 8155

### 1.0 BACKGROUND

10 CFR Part 40 states that an application for a specific license to possess and use source material will be approved if the applicant's proposed equipment, facilities, and procedures are adequate to protect health and minimize danger to life or property. 10 CFR Parts 70-- Domestic Licensing of Special Nuclear Material, and 76-- Certification of Gaseous Diffusion Plants, contain similar requirements for the issuance of licenses. These regulations also require applicants to comply with 10 CFR Parts 20-- Standards for Protection against Radiation, 73-- Physical Protection of Plants and Materials, 74-- Material Control and Accounting of Special Nuclear Material, and other parts as applicable.

Regulatory Guide 3.13 describes acceptable waste storage methods at UF<sub>6</sub> production plants. It is necessary to develop a similar guide for waste storage at fuel fabrication and uranium enrichment facilities, and NRC has determined that Regulatory Guide 3.13 should be updated and expanded to reflect current regulations and to include waste storage at these other facilities in addition to UF<sub>6</sub> production plants.

### 2.0 OBJECTIVE

The objective of this task order is to provide the NRC with recommendations to expand the scope of and update Regulatory Guide 3.13.

The update should account for changes in 10 CFR Part 20 and other regulations since the guide was last revised, as well as incorporating waste storage guidance issued in other forms since the guide was published. It should also expand the scope of the guide to cover enrichment and other NRC-regulated facilities, and storage of other forms of licensed special nuclear material waste at these facilities.

### 3.0 TECHNICAL QUALIFICATIONS REQUIRED

The key personnel shall have in-depth knowledge of radiation protection and criticality safety regulations, analytical methods, and waste storage methods and regulations.

#### 4.0 SCOPE OF WORK AND DELIVERABLES

The contractor shall provide technical assistance to the NRC by recommending replacement text for Regulatory Guide 3.13. The scope of this effort includes:

- a) Expand the title and scope of the Guide to include fuel fabrication and enrichment plants, in addition to UF<sub>6</sub> production plants.
- b) Expand the title and scope of the Guide to include other forms of SNM waste at fuel fabrication and enrichment plants.
- c) Update regulatory references in the Guide to current regulations, particularly 10 CFR Parts 20 and 76; and change references to the regulatory agency from the Regulatory Division of the Atomic Energy Commission to the Nuclear Regulatory Commission.
- d) Prepare a Regulatory Analysis paragraph for inclusion with the Guide revision.

The contractor shall prepare all deliverables in the word processor format in use at the NRC (currently WordPerfect 8.0), unless directed otherwise, and submit this to NRC with a paper and disk copy as detailed in the schedule below. Letter reports, draft reports and final technical reports must be edited and reviewed by the contractor and checked in accordance with good document quality assurance practices prior to delivery to the NRC. Draft products will be noted as such. Final technical reports must be presented to NRC in "camera-ready" form and ready for NRC publication.

- a) Within 8 weeks after the task is executed, the contractor shall provide NRC an initial draft of the Regulatory Guide revision.
- b) Within 4 weeks after receipt of (a) above, NRC will review and provide comments to the contractor.
- c) Within 8 weeks after receipt of NRC comments in (b) above, contractor shall provide a draft final Regulatory Guide revision to NRC, including detailed suggested text.
- d) Within 4 weeks after receipt of (c) above, NRC will review and provide comments to the contractor.
- e) Within 4 weeks after receipt of NRC comments in (d) above, contractor shall provide a final report to NRC that includes the changes requested in (d).

#### 5.0 PROJECT MANAGEMENT

The contractor shall maintain effective communication with NRC staff. For the duration of this task, the contractor shall participate in at least a bi-weekly telephone call with the NRC's TPM to discuss the progress of the work. The Contractor's Task Leader and NRC TPM shall participate in quarterly progress meetings to be held in Rockville, Maryland. Other meetings to address task planning and NRC comments will be scheduled on an ad hoc basis consistent with the availability of pertinent staff.

The contractor shall coordinate all necessary communication with entities other than the NRC's TPM and PO through the NRC TPM. The contractor shall resolve all NRC comments through the NRC TPM when making revisions to any deliverable under this task.

The contractor shall implement and maintain quality assurance requirements for the project in accordance with Section 14 of this SOW.

#### **7.0 LEVEL OF EFFORT**

NRC estimates that this project will take approximately 200 hours to complete.

#### **8.0 MEETINGS AND TRAVEL**

All travel must result in trip reports, which may be issued separately or as part of the next Monthly Letter Status Report. Copies of separately issued trip reports must be submitted within 15 days of the completion of travel. It is estimated that a minimum of 3 trips to NRC Headquarters will be needed for the purpose of: (1) discussions with NRC on work requirements of each task order, prior to commencing work; and (2) discussions with NRC on development of contractor products as circumstances warrant. When practical, telephonic or video conference calls will be in lieu of meetings at NRC Headquarters.

It is estimated that this task order will require contractor travel for attendance at the following meetings, as needed.

- a) One-day kick off meeting at NRC Headquarters to discuss the contractor's technical approach and milestones, and for contractor discussions with knowledgeable NRC licensing and inspection staff.
- b) One-day meeting at NRC Headquarters for information gathering and discussions with knowledgeable NRC licensing and inspection staff.
- c) One-day meeting at NRC Headquarters to discuss NRC comments on each draft report.

#### **9.0 NRC FURNISHED MATERIAL**

NRC will provide the contractor with a copy of Regulatory Guide 3.13 and an initial draft of a revision, along with NRC staff comments on that revision. NRC will also provide a copy of a February 23, 1996, memorandum from David L. Morrison titled "RES Office Letter No. 3A -- Regulatory Guide Development Process." In addition, NRC will provide guidance on its policy regarding use of Plain English in reports prepared by its staff or contractors.

#### **10.0 PERIOD OF PERFORMANCE**

The period of performance for the work specified in this task order will start on the effective date of this task order and will continue for no longer than 8 months.

## **11.0 CONTRACTOR ACQUIRED MATERIAL**

No materials are expected to be acquired under this task.

## **12.0 REPORTS**

All deliverables shall be submitted in hard copy and in an editable electronic text file consistent with the word processor format in use at the NRC.

## **13.0 TECHNICAL DIRECTION**

The NRC Technical Project Manager (TPM) for this task order is Mr. Michael Adjodha. The Project Officer (PO) for this contract and associated task work orders is Ms. Donna Umbel. Technical instructions may be provided to the contractor during the duration of the project. Technical instructions shall not constitute a new assignment of work or changes of such nature as to justify an adjustment in cost or period of performance. Directions, if any, for changes in scope of work, cost, or period of performance will be issued by the NRC Contracting Officer.

## **14.0 QUALITY ASSURANCE**

All deliverable reports must be reviewed by the contractor's management and approved with two signatures. One signature must be from the contractor's Task Leader, and one signature must be from a manager at a higher level than the contractor's Task Leader.

When report revisions are issued, a section must be included in the revised report to document dates of, reasons for, and scope of all changes made since the issuance of the first contractor's report.

NRC has the option of appointing a Peer Group to review, comment, and recommend changes to the draft and final reports. The contractor may recommend candidates for the Peer Group for approval by the NRC's TPM or PO.

In the event of dissent in the content of the final reports, the dissenting party shall have the option of stating its viewpoints and findings in a section of the report.

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