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Lessons Learned – New Facility Applications

Lessons Learned

- **Review process**
 - **Application Content**
 - **RAI/Open Issues Responses**
 - **Unusual Site Conditions**
 - **Waste disposal**
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- **Role of Models**

Review Process

- **Acceptance reviews – major issues/preponderance of evidence**
- **Technical review**
 - **Request for Additional information (RAI)**
 - **Draft Safety Evaluation Report (SER)**
- **Review RAI responses – 30 days**
- **Review open issue responses**
- **License issued 30 days after FSEIS is published**

Review Process – End Game

- **After open issues responses, no other documents will be reviewed**
 - **Draft license**
 - **Public meeting to discuss proposed conditions**
 - **Final draft license**
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- **Applicant consents to conditions in writing**
 - **Licensing decision completed**

Review Process – Keys to Responses

- **Understand the request**
 - **Request accompanied by explanation**
 - **Conversations with staff**
 - **Public Meetings**
 - **Provide complete responses**
 - **Conversations with staff**
 - **Public Meetings**
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- **RAIs/open issues supported by staff analysis –
SER Text**

Review Process – Ways to Improve

- **Pre-submission audit**
 - **Requested by applicant**
 - **Public meeting**
 - **Tour site and audit application**
 - **Debrief after audit; audit summary report**
 - **Application organization**
 - **Frequent communications with the staff**
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Unique Site Conditions

- **Biggest Lesson – every site is unique**
- **Site conditions must be described thoroughly**
 - **High water table – unconfined aquifer**
 - **Faults and other discontinuities**
 - **Absent or thinning confining layers**
- **Adjacent or proximal facilities**
 - **Hydraulic interference**
 - **Affects of public doses**
- **Plant locations**

Previous Site Activities

- **Pilot Tests – R&D Programs**
 - **Applications should discuss previous pilot tests or R&D programs at site**
 - **Include descriptions of activities, type of lixiviant, groundwater restoration details**
- **Previous exploration and aquifer testing**

Decommissioning Plans/Surety

- **10 CFR Part 40, Appendix A, Criterion 9**
 - **Based on Commission-approved cost estimates in a Commission-approved plan**
 - **Submit this plan in conjunction with an environmental report**
 - **Commission Decision CLI-00-08**
 - **Decontamination, decommissioning, reclamation plan prior to licensing**
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Waste Disposal

- **Fundamental aspect of UR operations**
- **Waste disposal option must be clearly identified**
- **Application must discuss contingencies to address disposal system failures**
- **If options presented, each option must be thoroughly discussed:**
 - **Disposal wells**
 - **Evaporation ponds/Impoundments**
 - **Land application**

Role of Models

- **Models suggested but not required**
 - **Demonstrates detailed understanding of site**
 - **Demonstrates knowledge of impact of operations on site and surrounding areas**
 - **Facilitates staff review by providing platform in which to conduct independent calculations**
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- **Staff may run scenarios and statistically compare**

Miscellaneous – License Conditions

- **License Conditions**
 - **Standard**
 - **Facility-Specific**
- **Facility-specific conditions**
 - **Supported by analysis in SER**
 - **Differ depending on nature of application and RAI/open issues responses**
- **Applicant should consider license conditions when developing responses and can propose license condition language**

Miscellaneous

- **Applications are licensing documents – avoid imprecise, descriptive language**
- **Internal consistency**
- **Consistency between ER and TR**



Thank You

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