

TABLE 1 - INSPECTION PROCEDURES APPLICABLE TO INSPECTION OF
A LOW-LEVEL RADIOACTIVE WASTE DISPOSAL FACILITY DURING OPERATIONS AND CLOSURE

Procedures Number	Procedure Title	OPERATIONS PHASE			CLOSURE PHASE		
		Inspection Frequency		Applicability of Procedure to Inspection of LLW Disposal Facility	Inspect. Frequen.		Applicability of Procedure to Inspection of a LLW Disposal Facility
		Min.	Normal		Min.	Normal	
30703	Management Entrance/Exit Interview	Each Inspection	Each Inspection	LLW Inspectors should subscribe to the general principles established in this procedure.	Each Inspection	Each Inspection	LLW Inspectors should subscribe to the general principles established in this procedure.
36100	10 CFR Part 21 Inspection at Nuclear Power Reactors	As Necessary	As Necessary	Inspectors should be sensitive to the underlying principle driving this procedure as it may pertain to some LLW disposal facilities. Future guidance is appropriate related to specific types of disposal facilities.	As Necessary	As Necessary	Inspectors should be sensitive to the underlying principle driving this procedure as it may pertain to some LLW disposal facilities. Future guidance is appropriate related to specific types of disposal facilities.
83822	Radiation Protection	Annually	Twice per Year	This procedure is applicable in its entirety to inspections of LLW disposal facilities during facility operations. Some discretion should be exercised in using the guidance in section 3.07.	Each Inspection (Frequency may reduce as closure progresses.)	Each Inspection	The inspection staff should initially follow the entire procedure to determine that the approved program is being implemented and to establish the degree of potential for exposures. Subsequent inspections can be tailored to concentrate on identified areas of risk.
83890	Closeout Inspection and Survey	N/A	N/A	N/A	As Necessary during implementation of Closure Plan		This procedure is generally applicable toward the end of the closure phase of LLW facility life. Specific guidance should be developed in order to use the procedure as a "closure" procedure rather than a "decommissioning" procedure. The guidance will address the facts that 1) most if not all of the RAM will be disposed of on site and 2) the facility is not being returned to unrestricted use.

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84850	Inspection of Waste Generator Requirements	Every other Year	Annually	This procedure has minimal applicability at a LLW disposal facility. It may be useful as a cross check of the means by which the facility operator verifies compliance by clients. It would also be applicable for inspecting the disposition of on-site generated waste.	N/A	N/A	N/A
84100	SNM Inspection at LLW Disposal Facilities	Annual	Annual	This procedure is specifically applicable to SNM inspections at LLW disposal facilities during operations.	N/A	N/A	N/A
84XXX	Operations Review of a LLW disposal facility (in development)	Annual	Twice per year	This procedure is specifically applicable to inspections of operating LLW disposal facilities.	N/A	N/A	N/A
84XXX	Facility Engineering (in development)	Annual	Twice per year	This procedure is applicable to inspection of engineering and construction aspects of a LLW disposal facility being implemented during operations.	N/A	N/A	N/A
86750	Solid Waste Management & Transportation of RAM	Annually	Twice per year	This procedure has applicability during the inspection of operations at a LLW disposal facility. The inspector should verify that the facility operator confirms compliance with transportation requirements by customers. The procedure should also be employed if the operator ships RAM offsite for any reason (e.g., shipment of RAM to a lab for analysis).	As needed	As needed	Use procedure only if closure results in RAM to be transported off site. The specifics of the licensee's packaging and transportation activities should be reviewed to determine which elements of Procedure 86750 will be inspected. It would be prudent to discuss the regulations and the inspection procedure early with the licensee.

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88005	Management Organization and Controls	Annual	Twice per year	This procedure is applicable in its entirety to inspections of LLW disposal facilities. Section 3.05, Q/A Programs, should be supplemented with specific guidance applicable to LLW facilities.	Annually	Annually
						<p>Procedure Control. In most cases, the closure license application and license conditions will specify the procedures for cleanup operations, implementation of disposal of residual radioactive material, and radiation protection and administrative controls. Inspections should determine whether or not the approved procedure controls are being implemented, and if NMSS and the safety committee are properly involved with any changes made to the procedure.</p> <p>Records Control & Storage. The focus of this inspection is to determine that records of exposures, surveys, and the nature and quantity of removed contamination are properly managed. This independent assessment should be implemented even if not required by license condition.</p>

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88005	Management Organization & Controls	See Previous Page		See Previous Page	Annually	Annually	<p>Internal Review & Audit. The first consideration is whether or not the process for independent internal reviews and audits is being implemented in accordance with license conditions. The inspection staff should assure itself that the licensee is independently controlling the safety of all operations even if a program or system is not explicitly defined or required by license condition.</p> <p>Safety Committee. During closure operations, the safety committee may consist of one or two people. Even so, all cleanup and safety activities should be tracked, recorded and evaluated, and reviewed periodically by the Safety Committee.</p> <p>Quality Assurance Program Annual Review. The licensee's closure plan will include managerial and administrative controls to be used to ensure safe implementation. Although an inspection frequency other than annual may be appropriate, the controls should be inspected often enough to ensure that they are being implemented consistent with license conditions.</p>
88010	Operator Training/ Retraining	Every Other Year	Annual	This procedure is applicable in its entirety to a LLW disposal facility.	N/A	N/A	N/A

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88025	Surveillance Testing	Annual	Twice per year	The concepts presented in this procedure are applicable to LLW disposal facility operations. Specific guidance is required to address the different systems encountered at a LLW disposal facility.	Annually	Twice per year	These procedures are directed to operations, but the underlying concerns may be present during closure operations. Equipment that is being used to remove residual radioactive material could have limitations that if exceeded could result in dispersal of radioactive material. Such systems should be monitored and periodically tested. Instruments should be checked to ensure that established calibration frequencies have been met. The inspection should include both process and health physics instrumentation.
88035	Radioactive Waste Management	Annual	Twice per year	Sections 2.01-2.06 are generally applicable to inspections of LLW disposal facilities. Section 2.07 needs to be expanded to provide specific details related to the inspection of waste disposal at a facility whose purpose is waste disposal. Section 2.08 does not apply.	Annually	Twice per year	Sections 2.01-2.07 are generally applicable to inspections of LLW disposal facilities in the closure phase.
88045	Environmental Programs	Annual	Twice per year	This procedure is applicable in its entirety to the inspection of LLW disposal facilities. Furthermore, specific guidance regarding its implementation at such facilities is needed.	Annually	Twice per year	This procedure is applicable in its entirety to the inspection of LLW disposal facilities. Furthermore, specific guidance regarding its implementation at such facilities is needed.

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88045	Environmental Programs	See Previous Page		License conditions will specify offsite monitoring and sampling locations, frequencies, and applicable limits on levels and concentrations of radioactivity.	See Previous Page		The potential for offsite release will be less during closure than during operations, but environmental impact is still a concern and must be inspected.
88050	Emergency Planning	Annual	Twice per year	This procedure is generally applicable to the inspection of LLW disposal facilities during facility operations. Inspector discretion is required regarding the degree to which all requirements are inspected against. The inspector should keep in mind that the nature and severity of an emergency at an operating LLW disposal facility is likely to differ from that at a fuel facility. The number of drills, number of trained individuals and the nature and amount of onsite emergency equipment is likely to differ from that expected at a Fuel Facility. Therefore, the inspector is cautioned to use existing guidance in this procedure advisedly.	Every two years	Annually	Because of the potential for dispersing radioactive materials, and of sustaining exposures and injuries during a fire, the fire prevention and protection program must be inspected. The frequency and depth of inspection are at the inspection staff's discretion and are dependent on the type of facility and the methods of closure.

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90712	In Office Review of Written Reports of Non- routine Events at Power Reactor Facilities	As Necessary	As Necessary	This procedure should be used conceptually and sparingly at LLW disposal facilities until an alternate procedure is developed. The concept of followup both by licensee and inspector on non-routine events is valid for LLW disposal facilities. However, nature and severity of non-routine events needs to be established specifically for LLW disposal facilities.	As Necessary	As Necessary	See guidance for Operations Phase
92701	Followup	As Necessary	As Necessary	Generic Procedure applicable to LLW Disposal.	As Necessary	As Necess	Generic Procedure applicable to LLW Disposal.
92702	Followup on Violations/Deviations	As Necessary	As Necessary	Generic Procedure applicable to LLW Disposal.	As Necessary	As Necessary	Generic Procedure applicable to LLW Disposal.
92703	Confirmatory Action Letters	As Necessary	As Necessary	Generic Procedure applicable to LLW Disposal.	As Necessary	As Necessary	Generic Procedure applicable to LLW Disposal.
93007	OSHA Interface Activities	As Necessary	As Necessary	Generic Procedure applicable to LLW Disposal.	As Necessary	As Necessary	Generic Procedure applicable to LLW Disposal.
94702	Participation in Licensee Meetings	As Necessary	As Necessary	Generic Procedure applicable to LLW Disposal.	As Necessary	As Necessary	Generic Procedure applicable to LLW Disposal.