

# NRC INSPECTION MANUAL

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## INSPECTION PROCEDURE 86750

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### DECOMMISSIONING SOLID RADIOACTIVE WASTE MANAGEMENT, DEMOLITION AND TRANSPORTATION OF RADIOACTIVE MATERIALS

Effective Date: 07/01/2025

PROGRAM APPLICABILITY: IMC 2561 A

#### 86750-01 INSPECTION OBJECTIVES

- 01.01 To verify the effectiveness of the licensee's programs for processing, handling, and storage and transportation of radioactive material.
- 01.02 To verify that demolition of radiologically impacted buildings is conducted in accordance with regulatory requirements.

#### 86750-02 GENERAL GUIDANCE

NRC and DOT share responsibility for regulating the transportation of radioactive materials within the United States. NRC regulations for the transportation of radioactive materials are codified in 10 *Code of Federal Regulations* (CFR) Part 71, "Packaging and Transportation of Radioactive Materials." DOT's hazardous materials regulations, which include radioactive material, are codified in 49 CFR Parts 100-199. A provision in the NRC regulations, 10 CFR 71.5, requires that NRC licensees comply with DOT's hazardous material regulations and lists many of the requirements and where to find them in the regulations. Applicable definitions can be found in 49 CFR 173.403. Further applicable regulations include 49 CFR Subpart I – Class 7 (Radioactive Materials).

Due to variance in decommissioning strategies and timelines, inspection effort is expected to vary based on the amount of radioactive material on-site and the number of radioactive material shipments since the last inspection.

Inspectors should select inspection items using a performance based, risk-informed approach, while also considering variety. Inspectors should review a sampling of past inspection reports to inform their selection.

#### 86750-03 INSPECTION REQUIREMENTS AND GUIDANCE

##### 03.01 Radioactive Material Storage, Control, and Processing

**Verify radioactive materials are processed consistent with the Process Control Program (PCP), controlled, labelled, and secured against unauthorized removal.**

### Specific Guidance

The level of effort for this requirement is expected to vary significantly dependent on the inspection category of decommissioning as described in IMC 2561, Appendix A, the level and type of site activities, licensee performance, considerations on whether the site is co-located, and the use of a risk-informed approach. The below guidance is grouped by topical area for convenience, not all are required. Note that an annual review of implementation of the 10 CFR Part 37 materials security program is not required.

#### a. Radioactive Waste Storage

Inspectors should consider conducting walkdowns of a sampling of radioactive waste storage areas, if available to determine whether radioactive materials are controlled, labelled, posted, and secured against unauthorized removal and that the areas meet requirements of their licensing basis and are appropriately described in the site licensing basis. The inspector should risk-inform their selections of walkdowns, while also varying the selections to, over the course of time, observe all accessible areas of the plant. Labelling should be in accordance with 10 CFR 20.1904, "Labeling Containers," or material should be controlled in accordance with 10 CFR 20.1905, "Exemptions to Labeling Requirements," as appropriate.

Inspectors should consider a sampling of containers of stored radioactive materials, as available, to evaluate the material condition of the containers, including whether there are signs of swelling, leakage, or deformation. Determine whether the licensee is performing periodic container inventories and inspections sufficient to meet 10 CFR 20.1406(c) and 10 CFR 20.1501(a)(2) requirements and is monitoring the impact of low-level radioactive waste storage sufficient to identify potential unmonitored releases, unplanned releases, or nonconformances with waste disposal facility requirements. Inspectors should consider buildup of any gases produced by waste decomposition, chemical reactions, buildup of water, i.e., from the freeze/thaw cycle, container deformation, or loss of container integrity. Additional guidance on LLW storage is provided in Regulatory Issue Summary 08-32, "Interim Low-Level Radioactive Waste Storage at Reactor Sites," Additionally, see Information Notice 90-50, "Minimization of Methane Gas in Plant Systems and Radwaste Shipping Containers," August 8, 1990.

#### b. Materials Security

For materials stored or used in the controlled or unrestricted areas, determine whether they are secured against unauthorized removal and controlled in accordance with 10 CFR 20.1801, "Security of Stored Material," and 10 CFR 20.1802, "Control of Material Not in Storage," as appropriate. The inspector should exercise caution in that some storage containers may exhibit elevated dose rates, and some containers may not be accessible. Container conditions should be verified by direct observation as the preferred method. However, a review of licensee programs consistent with as low as reasonably achievable (ALARA) principles can be considered acceptable. The inspector should focus on radioactive material storage areas that have been moved, modified, or created during decommissioning. The inspector should review requirements and descriptions of these areas found in the site licensing basis and compare them to onsite conditions.

Determine whether the licensee is adequately implementing the 10 CFR Part 37 security plan. Prior to all spent fuel being moved to an ISFSI, the inspectors focus on material

that is located outside of the protected area (PA), as described in the 10 CFR Part 73 security plan, or that has the potential to be moved outside the PA. Once all spent fuel is moved to an ISFSI and the 10 CFR Part 73 security plan only covers the area around the ISFSI, the inspectors should perform a focused inspection of the changes to the 10 CFR Part 37 program.

Once the 10 CFR Part 37 security program has been reviewed after shutdown and after any major changes, such as when all spent fuel is moved to an ISFSI, the inspection should focus on any changes to the program. Consider if the licensee has adequately evaluated radioactive material to determine if the material contains aggregated quantities of Category 1 or Category 2 material as defined by 10 CFR Part 37. Inspectors should note that radioactive material will likely be moved around the site numerous times during decommissioning. Inspectors should determine whether any radioactive material movement challenged the aggregated quantities and corresponding characterization, and security, as well as 10 CFR Part 20 requirements, including posting requirements.

Inspectors could consider a focused or expanded inspection using guidance in IP 87137, "10 CFR Part 37 Materials Security Programs," if program deficiencies are identified or suspected. Consult regional security inspection staff or other appropriate staff to determine how to disposition any identified issues involving radioactive material protection that reveal potential violations of 10 CFR Part 73 requirements. NRC Regulatory Information Summary 2015-15, "Information Regarding a Specific Exemption in the Requirements for the Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material," provides information on the relationship between the 10 CFR Part 73 security plan and 10 CFR Part 37 requirements.

Issues within the scope of Enforcement Guidance Memorandum (EGM) 2014-001 (i.e., involving Category 1 or Category 2 radioactive material in large components or robust structures, as defined in the EGM, where the underlying violation qualifies for enforcement discretion) are to be dispositioned as minor violations. However, these minor violations shall be documented in inspection reports in accordance with IMC 0610 and—for tracking purposes—issued a new enforcement action (EA) number each time enforcement discretion is granted. In these cases, the justification for the issue being dispositioned as a minor violation is the extremely low risk associated with theft or diversion of radioactive material contained in large components and robust structures as described in EGM-2014-001.

#### c. Radioactive Sources

The inspector should consider selecting a sampling of sealed sources, as available, from the licensee's inventory that present the greatest radiological risk and evaluate if the sources are accounted for and have been verified to be intact (i.e., they are not leaking their radioactive content) and if any transactions since the last inspection involving nationally tracked sources were reported in accordance with 10 CFR 20.2207. Licensees are required under 10 CFR 20.1501(a)(2) to conduct surveys that may be necessary to comply with Part 20 and that are reasonable under the circumstances to evaluate the magnitude and extent of radiation levels; evaluate quantities of radioactivity; and evaluate potential radiological hazards.

Some plants have technical specification (TS) requirements to inventory and leak test sources greater than a certain activity (e.g., > 100 microcurie beta/gamma, and

5 microcurie alpha activity). Other plants may have moved this requirement to a licensee-controlled document. In cases where the specific requirements, as stated in a plant's license, are different than the applicable regulations, licensees are obligated to meet the specific requirements as stated in their license. Therefore, it is possible that a licensee would be obligated to leak test sources that are otherwise exempt from leak testing per NRC regulations, if, for example, that licensee's TS contains a provision that generically states that sources above a certain level require leak testing. Routine maintenance can be performed by licensee personnel, but non-routine maintenance must be performed by the device manufacturer (or distributor) or a person specifically authorized by NRC or an Agreement State.

The focus of this specific inspection item should be on sealed sources that present the greatest radiological risk in the event their leakage is not adequately monitored. The inspector should note that many sources may have been segregated and staged for eventual disposal or may have already been disposed of. Inspection effort in this area should reflect the current site conditions. Devices that only contain exempt concentrations (10 CFR 30.14) or exempt quantities (10 CFR 30.18); or certain devices that are exempt from NRC materials licensing requirements under 10 CFR 30.15, 10 CFR 30.19, 10 CFR 30.20 or 10 CFR 30.22; or devices that contain generally licensed by-product materials that are exempt from leak testing as described in 10 CFR 31.5(c)(2)(i) or (ii), do not require leak testing per NRC regulations and do not fall within the scope of this inspection item. Issues that result from licensees failing to leak test sources that require leak testing by a TS or a procedure but are exempt per NRC regulations specifically listed in this paragraph should be dispositioned as minor violations.

High activity irradiators/calibrators are required to be registered in the NRC Sealed Source and Device Registry (SSDR). The SSDR lists which sources can be used in a particular device, the frequency for leak tests, the ANSI Category (ANSI CAT I is a self-shielded irradiator, whereas a CAT II would fall under 10 CFR Part 36, "Licenses and Radiation Safety Requirements for Irradiators"), conditions of normal use, and other information related to the use of the device.

#### d. Solid Radwaste Processing

The inspector should consider sampling waste processing systems, as available, and walk down the accessible portions of the system to verify that the current system configuration and operation agree with the descriptions in the Decommissioning Safety Analysis Report (DSAR), Offsite Dose Calculation Manual (ODCM), and PCP. Observe work activities, as available. Consider if solid radioactive waste is processed consistent with the PCP and licensee procedures and evaluate if the licensee's PCP correctly describes the current methods and procedures for dewatering and waste stabilization. Consider the process the licensee uses for the removal of freestanding liquid; particularly prior to shipment. If the licensee uses an on-site vendor to perform dewatering or waste stabilization, inspect the methods and procedures to assure compliance with vendor manuals, diagrams and procedures.

As available, select work activities to observe. The inspector should review greater than class C (GTCC) waste generation and packaging to determine if the waste is appropriately packaged, transported, and stored. Inspectors should consider soliciting assistance from ISFSI qualified inspectors for this evolution to review and observe heavy

loads, canister processing, and transportation. Decommissioning inspectors should review and observe occupational radiological controls, waste characterization, and waste handling. Inspectors should review the certificate of compliance and related documentation and site procedures to determine whether the packaging and on-site transportation meet licensing requirements.

Decommissioning inspectors should focus on the characterization of the waste and radiological impacts of the work. The inspector should consider unusual activities such as spent fuel pool rack removal, large component processing, class B/C waste processing, and general demolition as activities for review. The inspector should review the licensee's radiation protection controls, heavy load controls, and any mixed waste, environmental, and Part 61 considerations.

Determine whether the licensee has adequately implemented any new or temporary waste processing systems on-site, including portable systems, as available. Consider portable, temporary, and new radioactive waste processing equipment and systems and evaluate licensee controls to ensure that the systems and equipment have been properly evaluated, including determining that equipment will not contribute to an unmonitored release path. Review any changes made to the radioactive waste processing system. If the system is described in the ODCM, then the change should be evaluated against requirements contained in Technical Specifications or the Quality Assurance Program Document as applicable. Consider if changes from what is described in the DSAR were reviewed and documented as required. Changes to the DSAR must consider whether prior NRC approval is required consistent with 10 CFR 50.59. If the licensee uses a vendor to perform on-site waste handling or processing, consider if any changes in the system configuration were made in accordance with vendor manuals, diagrams and procedures.

### 03.02 Transportation of Radioactive Materials

**Verify that shipments containing radioactive material are prepared and shipped in accordance with regulatory and site requirements.**

#### Specific Guidance

For any new qualified shippers or as a periodic review of site personnel, review the applicable education, experience, qualifications, and training to determine if they meet the training requirements found in the Administrative Controls section of the plant TSs, 10 CFR 71.5 and DOT requirements contained in 49 CFR Part 172, Subpart H.

The inspector should consider reviewing any major changes since the last inspection in facilities, equipment, programs, and procedures that may affect waste management and transportation of radioactive materials, including new shipping containers and scaling factors via the licensee's 10 CFR Part 61 "Licensing Requirements for Land Disposal of Radioactive Waste" analyses. Consider if the waste stream mixing, sampling procedures and methodology for waste concentration averaging are consistent with the NRC branch technical positions on concentration averaging and encapsulation and waste classification, or if the licensee's approach is acceptable. The inspector should consider reviewing shipping containers that are new, unique, or homemade to determine if they provide reasonable assurance of being able to perform their intended function.

The inspector should observe at least one shipment of radioactive material, as available, and verify the adequacy of shipment preparation, including surveys. Determine if the shipment marking, labeling, and placarding is consistent with the information in the shipping documentation. Inspectors may choose to observe multiple shipments over the course of an inspection year dependent on licensee activities and risk significance of the shipments. Inspectors should review the adequacy of shipment preparation (e.g., shipment packaging, surveying, labeling, marking, placarding, vehicle checks, emergency response information, disposal manifests, shipping papers provided to the driver, and licensee verification of shipment and receipt readiness), as applicable. Waste generators shipping material intended for ultimate disposal (even through a waste processor) are required to document information on the Uniform Low-Level Radioactive Waste Manifest (NRC Forms 540 and 541) in accordance with 10 CFR 20.2006, which will require some characterization of the shipment. However, the waste classification section on NRC Form 541 is only required if the waste is consigned to a disposal facility. Instructions on filling out these forms (and what is/isn't required based on destination) can be found in 10 CFR Part 20, Appendix G and NUREG/BR-0204.

Inspectors should make an effort to observe Type B and Category 1 shipment activities, as available. Further inspection of these and other shipment activities in the calendar year should be based, in part, on licensee performance and risk-significance of such shipments. For Type B shipments, consider if the requirements of the transport package Certificate of Compliance (CoC) have been met; that the user is a registered package user and has an NRC approved QA program; and that the licensee followed procedures for cask loading and closure procedures consistent with the vendor's current approved procedures.

For shipments of Category 1 or Category 2 material, consider if the licensee met the requirements for recipient's license verification. For shipments of Category 1 material, consider if adequate movement control centers are established; if communications are adequate; if the driver is provided with an accompanying individual (if applicable); and if the driver is provided with written normal and contingency procedures. For shipments of Category 2 material, consider if the shipment is in constant control and surveillance of the licensee (or carrier); if the licensee (or carrier) has the capability to immediately establish communications; and, for situations when a licensee uses a carrier, if the carrier requires an authorized signature prior to release of the material for delivery. Inspectors should review if the licensee satisfied the advanced notification requirements applicable to Category 1 material shipments.

Consider how the licensee meets requirements in accordance with applicable regulations, including 49 CFR 397.101, for highway route control quantities (HRCQs) of materials in transport as defined in 49 CFR 173.403.

For shipments of LLRW or other low-level radioactive materials using NRC-certified packages, and which are not exempted by § 71.10 from the 10 CFR Part 71 requirements, verify that the licensee has implemented the requirements, as applicable, of 10 CFR 71, Subparts C, G and H. Applicable regulations can be found in 10 CFR 20 Appendix G, "Requirements for Transfers of Low-Level Radioactive Waste Intended for Disposal at Licensed Land Disposal Facilities and Manifests," 10 CFR 61.56, "Waste Characteristics," and 10 CFR 71, "Packaging and Transportation of Radioactive Material."

Based on direct observation of packaging and shipping activities in progress (if possible), review of appropriate records, and from discussions held with responsible licensee staff, determine if the following transportation program activities are adequate:

- a. Radiation and contamination surveys of packages and vehicles (10 CFR 173.441 and 173.443).
- b. Shipping paper documentation (49 CFR Part 172, Subpart C).
- c. Package marking and labeling (49 CFR Part 172, Subpart D; and § 172.400-407 and 172.436-440)
- d. Loading and storage, blocking and bracing of packages.
- e. Vehicle placarding and driver's instructions, when required.
- f. Notifications to state agencies, when required.
- g. Emergency response information (49 CFR 172, subpart G).
- h. Compliance, as applicable, with the shipper/carrier registration requirements of 49 CFR Part 107 Subpart G (see Information Notice 92-72, dated October 28, 1992).
- i. Consider calling the licensee's emergency response number listed on the shipping paper during the backshift while a licensee's radioactive material shipment is in transit to determine whether the licensee can provide, in a timely manner, the emergency response information, required by DOT requirements specified in 49 CFR 172.600 through 172.604. The specific contents of the emergency response information that must be provided are described in 49 CFR 172.602. Requirements for the 24-hour emergency response telephone number are described in 49 CFR 172.604 and include the following:
  1. The number must be monitored at all times while the hazardous material is in transit.
  2. The number must be the number of a person who is either knowledgeable of the hazardous material being shipped, and has comprehensive emergency response and incident mitigation information, or who has immediate access to such a person.
  3. The number must be entered on the shipping paper.

All emergency response information required by DOT regulations must be accurately provided on shipping papers or other documents, and the licensee must be prepared to respond promptly with the information needed, when called. Emergency responders will expect the licensee to remain on the line until the information needed has been provided. As general guidance, emergency responders will also expect this information to be provided within 15 minutes. For additional background information on this requirement, see NRC Information Notice 92-62, dated August 24, 1992.

The inspector should consider sampling shipping packages, as available, to determine whether they have been appropriately characterized, classified, and prepared in accordance with procedures. At a minimum, consider if the shipping documents indicate the proper shipping name; emergency response information and a 24-hour contact telephone number; accurate curie content and volume of material; and appropriate waste classification, transport index, and United Nations (UN) identification number.

Consider if the licensee correctly uses radiochemical analysis results to support radioactive waste characterization and if the licensee's use of scaling factors and calculations to account for hard to detect radionuclides is technically sound. Refer to 10 CFR 61.55 Waste Classification for applicable regulations on classification.

Inspectors should consider reviewing licensee guidance used to determine the licensee's waste form and classification for a sampling of shipments made since the last inspection. Determine if the scaling factors used for these shipments were appropriately based on actual waste stream analysis. Based on the licensee's records of one or two shipments of waste requiring processing prior to shipment for disposal, determine whether the processed waste meets the waste form stability requirements of 10 CFR Part 61.56. Determine whether this was waste processed using a quality control program as required by 10 CFR 20.2006(d). Guidance for implementing this inspection requirement can be found in the branch technical position (BTP) on Waste Form. Radioactive material must be properly packaged based on the hazard that the material represents. Proper packaging ensures that the material will be contained based on normal conditions that the package will encounter during transport, and, for higher activity material, accident conditions for which the package was designed. If the material is not properly packaged, the desired level of safety will not be achieved and hence the material cannot be safely shipped.

### 03.03 Demolition and Disposition Radiologically Impacted Structures

**Verify that demolition and disposition of radiologically impacted structures is conducted in accordance with applicable regulations and site procedures.**

#### Specific Guidance

The below guidance applies to radiologically impacted structures, both above and below ground, that the licensee plans to demolish prior to license termination. A radiologically impacted area is an area where radiological contamination is known, suspected, or cannot be ruled out without further investigation. Inspectors should note that 10 CFR 50.82(a)(9) requires power reactor licensees to submit an application for termination of license, which must be accompanied or preceded by a License Termination Plan (LTP) for approval by the NRC. The LTP must be submitted at least 2 years before termination of the license date. The LTP applies to structures and soils that are to remain as part of the site upon license termination. If material from demolished structures is planned to be reused instead of shipped offsite, the inspectors should notify the NRC project manager.

During the process of decontamination and dismantlement, many impacted tanks, buildings, and other structures will be assessed and demolished. Some may be surveyed with the intent to free release the structure prior to open air demolition while others may be demolished without being free released. The inspector should determine whether the licensee developed and executed adequate survey and demolition plans which provide a technically defensible approach to demonstrate that the facility can be demolished, and rubble can be appropriately dispositioned. For a timely, efficient review, the inspector should consider reviewing approved documents as they become available.

Inspectors should consider reviewing documentation at the beginning of the decommissioning process and determine future inspection effort based on licensee performance. Inspectors can risk inform the inspection by further considering the previous use of the structure and expected radiological source term. The inspector



should note that the NRC does not approve survey plans, survey reports, and demolition plans, and prior review is not required for the licensee to begin work. Consider 10 CFR 20.1406(c) during review of these activities to determine whether licensees conducted operations to minimize the introduction of residual radioactivity into the site, including the subsurface, and consider 10 CFR 20.1501(a) to determine whether the licensee conducted adequate surveys that may be necessary to comply with the regulations of 10 CFR Part 20 and were reasonable under the circumstances.

For structures intended to be free released prior to open air demolition, determine whether the survey report provides adequate evidence that the survey plan requirements and the release criterion were met. The inspector should consider:

- a. Whether the survey strategy is commensurate with the structure history of use and spills and any initial surveys i.e., reconnaissance, scoping, and/or characterization surveys.
- b. Whether the plan addresses the handling and/or release of any building contents i.e., desks, lockers, chairs, laboratory equipment, etc. or whether they will be included in the demolition.
- c. Whether a description of each distinct survey area (or survey unit), instructions of the type, amount, and coverage of surveys and sampling required in each area. Consider reviewing any maps provided.
- d. Whether the licensee considered any special focus areas i.e., stacks, roofs, gutters, downspouts, potential backflow from contaminated systems to clean systems, embedded pipes or ducts, floor drains, etc.
- e. Whether the free release criteria are adequate. See IE Circular 81-07 for further guidance.
- f. Whether the survey instruments selected are appropriate for the expected radiological source term, the method for determining an acceptable background and how that will be documented, and the method proposed to verify that the instrument minimum detectable activities will be below the release criterion.
- g. Whether procedural guidance is adequate. Consider the order of survey techniques, the process to be followed should anomalous results be identified, and quality controls to be used, including daily performance checks of each survey instrument.
- h. Whether the licensee identified the process to be followed for results that exceed the release criterion. This could include increasing the survey sample size or frequency to account for the unexpected result and/or consideration of re-classification of the survey area.

The inspector should consider reviewing the results of the surveys to determine whether the survey plan was adequately followed and whether the results indicate that the survey objectives were met.

For impacted structures that the licensee plans to demolish without free releasing, the inspectors should consider whether the licensee has a technically justifiable demolition plan to ensure that the radiological source term and associated effluent are appropriately addressed. The inspector should consider whether the licensee performed adequate

historical review and surveys. Surveys may be similar to those described above, but the goal may differ to either gain information of the residual radioactivity or to determine whether the contamination is less than a pre-established level. Inspectors can use the applicable guidance above during review of these survey plans and results. Consider whether the licensee adequately determined the material at risk (MAR) (the total quantity of radioactive material that could be affected by the demolition process) and the airborne release fraction (ARF) (the fraction of MAR that becomes airborne due to demolition activities). Considerations in determining the ARF include the demolition method, properties of the contaminated material, and use of dust suppression methods. Inspectors should determine whether the licensee included adequate air sampling, radiological and contamination survey requirements, water infiltration considerations, weather considerations, contamination control methods i.e., wet suppression techniques such as misting, and segregation of radiologically impacted and non-impacted material in the demolition plan commensurate with the MAR and ARF.

For demolition of structures regardless of radiological source term remaining, determine whether the licensee considered potential structural and radiological impacts on surrounding structures, systems, and components in their demolition plan. The rubble may be sent to a clean industrial landfill, a metal recycling facility, a radiological waste disposal site, or a combination. Occupational exposure considerations during survey and demolition activities should be reviewed under IP 83750. Inspectors should consider the respirable fraction of the airborne particles released by demolition and determine whether respiratory protection is adequate for the hazard. Additionally, the inspector should consider observing and reviewing any aggressive remediation such as scabbling.

#### 03.04 Problem Identification and Resolution

**Verify that the licensee is identifying problems related to radioactive waste storage, processing, and transportation activities at an appropriate threshold and entering them into the corrective action program. If applicable, for a sample of problems documented in the corrective action program, verify that the licensee has identified and implemented appropriate corrective actions.**

##### Specific Guidance

In determining risk-significance of corrective action program entries for review, consider reviewing deficiencies identified in the Part 37 program, potential or actual mischaracterizations of waste, issues identified during risk-significant shipments, and missing sources.

#### 86750-04 RESOURCE ESTIMATE

Note that for all decommissioning inspection activities, the frequency of performance, level of effort needed, and specific inspection requirements to be evaluated and verified vary based on the stage of decommissioning at the facility, the scope of licensee activities, and the overall decommissioning strategy chosen for the plant (i.e., SAFSTOR or DECON). IMC 2561 contains a discussion of the expected inspection frequency and resource estimates during each phase of decommissioning and should be used when planning resources to conduct this inspection.

## 86750-05 PROCEDURE COMPLETION

Inspection procedure completion is based on completion of the inspection procedure requirements at the frequency specified in IMC 2561, Appendix A. The inspector is not required to complete all of the inspection requirements listed in this IP, nor is the inspector limited to those inspection requirements listed if additional safety concerns are identified. However, the objective of this IP shall be met. Inspection findings, open items, follow-up items, and conclusions shall be documented in accordance with IMC 0610 and other relevant regional or headquarters instructions. Inspections resulting from allegations will be documented and dispositioned in accordance with Management Directive 8.8.

## 86570-06 REFERENCES

- NRC Bulletin 1979-19, "Packaging of Low-Level Radioactive Waste for Transport and Burial," dated August 10, 1979,
- NRC Information Notice 1986-20, "Low-Level Radioactive Waste Scaling Factors, 10 CFR Part 61," March 28, 1986
- NRC Information Notice 1990-50, "Minimization of Methane Gas in Plant Systems and Radwaste Shipping Containers," August 8, 1990
- NRC Regulatory Issue Summary 2008-32, "Interim Low Level Radioactive Waste Storage at Reactor Sites"
- NRC Regulatory Issue Summary 2015-02, "Reporting Of H-3, C-14, Tc-99, and I-129 On the Uniform Waste Manifest"
- NRC Regulatory Issue Summary 2015-15, "Information Regarding a Specific Exemption in the Requirements for the Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material"
- NRC, "Changes to the Radioactive Material Packaging and Transportation Regulations," NRC Presentation, 2015 (ML16004A174)
- NRC, "Concentration Averaging and Encapsulation Branch Technical Position, Rev. 1, Vol. 1" February 2015, (ML12254B065)
- NRC, "Concentration Averaging and Encapsulation Branch Technical Position, Rev. 1, Vol. 2, Response to Stakeholder Comments and Technical Basis," February 2015, (ML12326A611)
- NRC, "Revised Staff Technical Position on Waste Form (SP-91-13)," dated January 30, 1991, (ML033630746)
- NUREG/BR-0204, "Instructions for Completing NRC's Uniform Low-Level Radioactive Waste Manifest"
- NUREG-1556, "Consolidated Guidance About Materials Licenses," Volume 18, "Program-Specific Guidance About Service Provider Licenses," August 2017

NUREG-1608, "Categorizing and Transporting Low Specific Activity Materials and Surface Contaminated Objects"

NUREG-1660, "U.S.-Specific Schedules for Transport of Specified Types of Radioactive Material Consignments"

NUREG-2155, "Implementation Guidance for 10 CFR Part 37, 'Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material'"

NUREG-2166, "Physical Security Best Practices for the Protection of Risk-Significant Radioactive Material"

RG 1.21, "Measuring, Evaluating, and Reporting Radioactive Material in Liquid and Gaseous Effluents and Solid Waste"

RG 7.10, "Establishing Quality Assurance Programs for Packaging Used In Transport Of Radioactive Material," Revision 3

RG 7.7, "Administrative Guide for Verifying Compliance with Packaging Requirements for Shipping and Receiving of Radioactive Material"

END

Attachment 1: Revision History for IP 86750

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
N/A	03/15/1994	Initial issuance.	N/A	N/A
N/A	ML20274A024 10/27/20 CN 20-056	Major revision. Revised to include feedback from inspectors and also for format and editorial changes. The content of this procedure was updated to focus on the inspector's efforts on risk informing the inspection.	N/A	ML20274A025
N/A	ML25139A100 06/27/25 CN 25-022	Major revision. Updated to include inspection experience since the last revision and add an inspection requirement to review demolition of radiologically impacted structures. IMC 0040 exception granted to bold inspection requirements.	N/A	N/A