

UNITED STATES NUCLEAR REGULATORY COMMISSION

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November 7, 2023

ALL AGREEMENT STATES CONNECTICUT, INDIANA, W EST VIRGINIA

NOTIFICATION OF ISSUANCE OF DRAFT INTERIM STAFF GUIDANCE, DUWP-ISG-02, "RADIOLOGICAL SURVEY AND DOSE MODELING OF SUBSURFACE TO SUPPORT LICENSE TERMINATION" (STC-23-074)

Purpose: To inform all Agreement States that U.S. Nuclear Regulatory Commission (NRC) staff in the Office of Nuclear Material Safety and Safeguards (NMSS), Division of Decommissioning, Uranium Recovery and Waste Programs (DUWP), issued draft Interim Staff Guidance (ISG), DUWP-ISG-02, "Radiological Survey and Dose Modeling of the Subsurface to Support License Termination," for public comment.

Background: On July 19, 2022, NRC staff published NUREG-1757, Volume 2, Revision 2, "Consolidated Decommissioning Guidance, Characterization, Survey, and Determination of Radiological Criteria" (Agencywide Documents Access and Management System at Accession No. ML22194A859). The document provides updated guidance on radiological surveys and dose modeling to support license termination under the NRC's License Termination Rule (LTR) in Title 10 of the *Code of Federal Regulations* (10 CFR) Part 20, "Standards for Protection against Radiation," Subpart E, "Radiological Criteria for License Termination." The updates were based on lessons learned and experience from review of decommissioning documents since the last revision in 2006. Following issuance of NUREG-1757, Volume 2, Rev. 2, additional guidance related to radiological survey of the subsurface was developed.

Discussion: On October 19, 2023, the NRC staff issued DUWP-ISG-02, "Radiological Survey and Dose Modeling of the Subsurface to Support License Termination," (ML23177A008) for public comment. The document is available for a 60-day public comment period ending on December 18, 2023. Comments submitted after December 18, 2023, will be considered if practical to do so. You can access the *Federal Register* notice and the draft ISG using the following link: https://www.federalregister.gov/documents/2023/10/19/2023-23114/draft-interim-staff-guidance-radiological-survey-and-dose-modeling-of-the-subsurface-to-support.

The draft ISG supplements guidance in Revision 2 to NUREG-1757, Volume 2, related to surveys of open surfaces in the subsurface, including open excavations, substructures, and materials planned for reuse. The draft ISG also provides guidance on the use of commonly used decommissioning dose modeling codes to develop clean-up levels for submerged and partially submerged substructures and on methods to evaluate risk from existing groundwater contamination.

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The NRC staff held two subsurface investigations workshops on July 14-15, 2021, and May 11, 2022, to help support development of this draft ISG, and contracted with Oak Ridge Associated Universities to assist with development of a portion of the guidance on acceptable survey methods.

Please provide responses or questions about this communication to:

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Sincerely,

Author Signed by Giantelli, Adelaide on 11/07/23

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