

NRC/Agreement States Working Group  
on Termination of Uranium Mill Licenses in Agreement States

MEETING SUMMARY  
June 12, 2001  
8:00 am - 3:00 pm  
Executive Tower Hotel, Denver, Colorado

Participants

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\* Co-Chair

1. General Discussions

- Ž Meeting participants as signed in the attendance sheet are listed above.
- Ž Kevin Hsueh reported that for each session there will be at least 10 minutes reserved for all meeting participants to provide their comments. The rest of the time will be reserved for the working group (WG). In addition to that, as indicated in the agenda, there is a period of time between approximately 2:30 and 3:00 pm reserved for all the meeting participants.

2. Status of Specific Tasks

Task 1 Draft revised STP SA-900 Procedure

- Ž Kevin Hsueh presented WG background information including the status of the WG, an overview of the NRC license termination process, and the WG charter. He briefly reviewed the draft revised procedure and its five appendices, and indicated areas where major changes had been made so far. He emphasized that the review of Long Term Surveillance Plan (LTSP) is not within the scope of the WG charter.

It was mentioned that WG has a new web site under the Office of State and Tribal Programs (STP) homepage posting all the WG related documents such as meeting agenda, meeting summaries, draft revised procedures and reference documents used by WG.

- Ž WG discussed a proposal to review completion review reports (CRRs) in two phases: (1) AS submit draft CRRs for NRC review; (2) after revising the draft CRR based on NRC comments, AS submit final CRRs. WG agrees on the two phase approach and it should be applied to both conventional and non-conventional CRRs. Several paragraphs will be added to the procedure to address this approach.

- Ž There was a concern raised by meeting participants regarding NRC concurrence process. Specifically, it was indicated that without reviewing the detailed analyses conducted by AS staff, NRC reviewers would not have sufficient information needed to concur on AS conclusions that all applicable standards have been met. Unless NRC involves in every step of major licensing actions, such as AS review and approval of reclamation plans, decommissioning plans, NRC staff would not have all the information needed to make its determination. Given NRC review of AS CRRs is different from review of licensee reports, it was suggested that the procedure should clearly state the scope of review that should be conducted by NRC reviewers.

WG indicated that AS can make its licensing actions without NRC concurrence except for license termination. In the past, NRC has not involved in AS licensing actions unless NRC received requests from AS for technical assistance in specific areas. WG also recognized that most of the uranium milling sites in AS are in the final phase of license termination, i.e., reclamation and decommissioning plans may have been reviewed and approved by AS. It would not affect most of the sites if NRC decides to

start early involvement in AS's licencing actions. NRC resources to conduct such activities were also discussed and it was noted that resources concern is one of the reasons that NRC decided not to involve in every step of AS licensing actions.

WG agreed that the procedure should include a statement to clarify the scope of review conducted by NRC reviewers.

## Task 2            Sample CRR for Conventional Uranium Mill

- Ž     WG's discussed the level of detailed information needed in the CRRs. It was suggested that the threshold for that would be whether NRC has sufficient information to understand the State's basis for its conclusion that all applicable standards and requirements have been met. Any detailed information beyond that would not be necessary.
- Ž     WG agreed that the summary Table for a list of standards and requirements should have three columns: (1) criterion column includes a list of criteria starting from criterion 1 in 10 CFR Appendix A; (2) CRR section column identifies which section of the CRR would address the corresponding criterion; (3) Technical Evaluation Report (TER) section column identifies which section of the TER (or equivalent documents) would address the corresponding criterion. After review of AS CRRs, if the CRR does not contain sufficient information for NRC to understand State's basis, NRC may request specific additional information in TER or equivalent as identified in column (3) of the summary Table.
- Ž     Phil Egidi and Dorothy Stoffel will add additional background information to the section 1 of the sample CRR regarding licensee's closeout activities.
- Ž     Dan Rom, Phil Egidi and Dorothy Stoffel will work on revising the seismic evaluation section under Geotechnical Stability (example 1: Sherwood CRR).
- Ž     Dan Rom will work on revising the settlement potential and de-watering of tailings sections.
- Ž     Dan Rom will take the lead on revising the Geotechnical Stability (example 2:Atlas TER) portion of the CRR and also examining if examples 1 and 2 can be combined into one example.
- Ž     Ted Johnson will take the lead on revising the Surface Water Hydrology and Erosion Protection portion of the CRR including adding a subsection to deal with vegetation cover.
- Ž     Phil Egidi and Kevin Hsueh will work on revising the Radiation Cleanup an Control section.
- Ž     Rob Herbert will provide language to be included in the Ground Water Remediation section regarding LTSP costs for the permeable reactive walls after closure.

- Ž There is a question raised by meeting participants regarding the second groundwater standards. Specifically, would the secondary groundwater standards related to non-hazardous constituents be included in the CRR as part of the applicable standards and requirements? WG will respond to this question at a later time.

#### Task 3. Sample CRR for Non-conventional Uranium Mill

- Ž WG reviewed the sample CRR and identified several areas that may need to be expanded or revised for completeness. Since TX has all the in-situ sites, Gary Smith will take the lead to update the CRR.

#### Task 4. WG recommendations

- Ž As discussed in May 30 conference call, WG recommends that NRC continue to have site visits as part of the early interactions with AS prior to license termination. The site visit activities should be captured in writing as part of the revised SA-900 Procedure.
- Ž During the May 30 conference call, WG recommended that NRC consider having a special team to review AS uranium recovery program in addition to the IMPEP on site review if the IMPEP team recommends that such a follow-up review is necessary. Since WG agreed to have a two phase review of CRRs as discussed under Task1, WG decided to remove this item from its list of recommendations.

#### Discussions/Comments from Participants

- Ž It was suggested that a copy of sample NRC evaluation report be included in the procedure as part of the Appendices. WG decided to include a sample evaluation report in the procedure.
- Ž It was noted that the current version of the procedure has not incorporated some of the suggestions that WG has received to date. WG is still in the process of considering these suggestions and plans to document how each suggestion is handled by WG.
- Ž Kevin Hsueh summarized major items discussed during the meeting.