

NRC INSPECTION MANUAL

NMSS/DWM

MANUAL CHAPTER 0111

REGION I MONITORING ACTIVITIES FOR THE DOE WEST VALLEY DEMONSTRATION PROJECT

0111-01 PURPOSE

To establish responsibilities and to provide guidance for Region I's monitoring program at the Department of Energy's (DOE) West Valley Demonstration Project (WVDP) at West Valley, New York.

0111-02 POLICY AND OBJECTIVES

Region I will monitor and document the results of monitoring activities at the WVDP related to design, construction, equipment installation, operational and decommissioning activities that may radiologically affect public health and safety. The technical monitoring program is conducted to help fulfill NRC's responsibility for monitoring the WVDP as mandated by Public Law 96-368, the "West Valley Demonstration Project Act of 1980" and formally implemented by a Memorandum of Understanding (MOU) between the DOE and the NRC (Federal Register Notice, Vol. 46, No. 223, page 56960, November 19, 1981). In this MOU the Director, NMSS, is assigned responsibility for ensuring the implementation of the agreement. The Project Manager, NMSS, is designated as the NRC point of contact for all communications relating to carrying out the provisions of the Agreement.

The objective of the monitoring activities is to help provide the bases for NMSS to advise the DOE of the adequacy or inadequacy of the WVDP facilities and their operation to protect the public health and safety from radiological danger. Protection of all people on the site is the sole responsibility of the DOE and its contractors. The focus of Region I monitoring activities should be on facility construction, testing, operations, and decommissioning that could impact public health and safety. Region I will use the descriptions, operating limits, minimum conditions and technical specifications in the Safety Analysis Report and its updates, and DOE orders as the criteria for monitoring the program.

0111-03 DEFINITIONS

03.01 Monitoring Activities. Review, evaluation, testing, and engineering and scientific measurement related to components, systems operations, and decommissioning at the WVDP that could radiologically impact public health and safety. The activities may include

review of documents and drawings. Technical expertise in engineering, construction, health physics, environmental protection, and quality assurance may be involved.

0111-04 RESPONSIBILITIES AND AUTHORITIES

04.01 Director, Office of Nuclear Materials Safety and Safeguards. Approves the monitoring program.

04.02 Regional Administrator, Region I

- a. Ensures that the program is conducted and documented in accordance with this instruction.
- b. Ensures that Region I staff having the proper technical discipline and expertise are made available and perform monitoring activities, as required.

04.03 Director, Division of Nuclear Materials Safety, Region I

- a. Develops and assesses the effectiveness of the conduct of the program.
- b. Prepares budget requests for the program.
- c. Ensures that the Decommissioning and Laboratory Branch conducts and documents the program in accordance with this instruction.

04.04 Chief, Decommissioning and Laboratory Branch, Region I

- a. Plans and implements monitoring activities in coordination with NMSS's designated Project Manager for the WVDP.
- b. Requests technical expertise from other Region I branches as needed.
- c. Provides timely documentation of monitoring activities and results.
- d. Advises the NMSS Project Manager of activities and areas at the WVDP that should be monitored.
- e. Requests contracted technical assistance from NMSS as required.

04.05 Director, Division of Waste Management.

- a. Plans and implements NRC activities for the West Valley Program.
- b. Ensures that the NMSS monitoring program is utilized for appropriate monitoring activities at the WVDP.
- c. Provides applicable contracted technical assistance.
- d. Coordinates preparation of the West Valley monitoring program.

e. Integrates West Valley monitoring programs with other West Valley activities. |

04.06 NMSS Project Manager. Ensures that Region I's Nuclear Materials Safety Division receives necessary project documents related to its responsibilities; provides guidance and coordinates with Region I on scheduling monitoring visits to the site; and coordinates all communication with DOE regarding NRC concerns. |

0111-05 BASIC REQUIREMENTS

05.01 Monitoring activities are technical evaluations instead of inspections, because the WVDP is not licensed by the NRC and there are no NRC license conditions or NRC acceptance criteria. The uniqueness of the WVDP and NRC's role makes the use of specific inspection procedures inappropriate. Thus monitoring activities during construction, testing, operations, and decommissioning will have to be planned on an ad hoc basis and in coordination with the NMSS Project Manager. |

05.02 Region I staff will communicate or discuss the results of technical evaluations with DOE through distribution typical of routine inspections, including the NMSS Project Manager and the State of New York. The DOE-NRC MOU indicates that the NMSS Project Manager is NRC's point of contact with the DOE for the WVDP. |

05.03 The monitoring results, and conclusions of technical evaluations are to be documented as reports from the Chief of Region I's Decommissioning and Laboratory Branch to the DOE West Valley Project Manager, with a copy to the NMSS Project Manager. The report will detail the activities covered to enable subsequent review of the activities to assure that proper evaluations have been completed. All reports or memoranda are official NRC records and must be retained in accordance with the approved schedule of records retention and disposal (Office of Administration). |

05.04 Monitoring visits should be conducted as needed in coordination with the NMSS Project Manager, but at a minimum frequency of twice a year. |

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