

APPENDIX A

GUIDANCE FOR REVIEWING HISTORICAL ASPECTS OF SITE PERFORMANCE FOR LICENSE RENEWALS AND AMENDMENTS

For license renewals and amendments, the historical record of site operations, including air and ground-water quality monitoring, provides valuable information for evaluating the licensing actions. Following are specific areas where a compliance history or record of site operations and changes should be provided for review:

- For license renewals, U.S. Nuclear Regulatory Commission (NRC) inspection reports and license performance reports
- Amendments and changes to operating practices or procedures
- License violations identified during NRC or Agreement State site inspections
- Excursions, incident investigations or root cause analyses, and resultant cleanup histories or status
- Exceedences of any regulatory standard or license condition pertaining to radiation exposure, contamination, or release limits
- Exceedences of any non-radiation contaminant exposure or release limits
- Updates and changes to any site characterization information important to the evaluation of exposure pathways and doses including site location and layout; uses of adjacent lands and waters; population distributions; meteorology; the geologic or hydrologic setting; ecology; background radiological or non-radiological characteristics; and other environmental features
- Environmental effects of site operations including data on radiological and non-radiological effects, accidents, and the economic and social effects of operations
- Updates and changes to factors that may cause reconsideration of alternatives to the proposed action
- For license renewals, updates and changes to the economic costs and benefits for the facility since the last application
- For license renewals, the results and effectiveness of any mitigation proposed and implemented in the original license

If, after a review of these historical aspects of site operations, the staff concludes that the site has been operated so as to protect health and safety and the environment and that no unreviewed safety-related concerns have been identified, then only those changes proposed by the license renewal or amendment application should be reviewed using the appropriate sections of this standard review plan. Aspects of the facility and its operations that have not changed since the last license renewal or amendment should not be reexamined.