



Westinghouse Electric Company
Hematite Facility
3300 State Road P
Festus, MO 63028

June 15, 2004

Post: 70-36
Docket:

Mr. Amir Kouhestani
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Mail Stop T7 F27
Rockville, MD 20852-2738

Subject: Submittal of Modification Procedure

Reference: SNM-33, Docket No. 70-36

Dear Mr. Kouhestani:

Attached for your information is procedure PR-GM-004, Modifications to Programs and Procedures. This is the implementing procedure for compliance with the Westinghouse commitments noted in license amendment 45. Mr. Chris Miller of Region III requested an informational copy for review prior to a site visit. It is Westinghouse's understanding that successful implementation of this procedure will enable the NRC to release Hematite to resume radioactive waste shipments.

If you have any additional questions concerning this submittal, please feel free to contact me at (314)810-3306.

Regards,

A handwritten signature in cursive script that reads 'Karen Ann Craig'.

Karen Ann Craig
Manager, Regulatory and Licensing

Attachment: PR-GM-003, *Modifications to Decommissioning Programs and Procedures*

cc: Dan Gillen

AKC
6.21.04



Westinghouse

Hematite Former Fuel Cycle Facility Decommissioning

PROCEDURE

TITLE: Modifications to Decommissioning Programs and Procedures

USERS: Hematite Decommissioning Staff

REVISION: 0

Owner : Official Record Electronically Approved in EDMS 2000 Date: see EDMS
Karen Ann Craig

Reviewer: Official Record Electronically Approved in EDMS 2000 Date: see EDMS
A. Joseph Nardi

QA: Official Record Electronically Approved in EDMS 2000 Date: see EDMS
Gordon M. Vytlačil

Director: Official Record Electronically Approved in EDMS 2000 Date: see EDMS
H. A. Sepp

Official Record Electronically Approved in EDMS 2000

Approvals printed on 06-15-2004 15:49:40 esbuapp

Document Number: PR-GM-004

Revision: 0

Sheet:

Document Date: 6/4/2004 12:00:00 AM

Subject: Modifications to Decommissioning Programs and Procedures

Proprietary Class: 2 (R)

Name: Craig

Document Type: Policies & Procedures

DMD Alpha: NFD-PRJ

DMD Record No.: 010

Plant: (NONE)


ESBU Approvals:

| | | |
|---------------------------|-------------------|-------------------|
| Document Control | No name specified | nulldate |
| Project Director Approval | Sepp Hank | 06/06/04 23:26:53 |
| QA Approval | Vytlačil Gordon | 06/04/04 15:16:24 |
| Archive | No name specified | nulldate |
| Reviewer Approval | Nardi Joseph | 06/04/04 15:09:44 |
| Owner Approval | Craig Karen | 06/04/04 14:23:07 |

Modification Procedure

- PR-GM-004, *Modifications to Decommissioning Programs and Procedures*, Revision 0, 6/6/2004

This is to acknowledge that the above procedure(s) have been reviewed and approved for use at the Hematite facility with the above referenced effective date.



H.A. Sepp
Site Manager

6/16/04

Date



1.0 PURPOSE

The purpose of this document is to establish the process for revising the Hematite decommissioning program in accordance with the requirements of NUREG-1757, *Consolidated NMSS Decommissioning Guidance* (Reference 4.1). This will assure the impact of proposed changes can be fully assessed prior to implementation.

2.0 APPLICABILITY

This procedure is applicable to the Westinghouse decommissioning program, policies and procedures. Contractor programs are to be compliant with the Westinghouse policies and SNM-33 and shall be reviewed for compliance. Westinghouse should use this procedure in order to perform review of both Westinghouse and contractor modifications.

3.0 DEFINITIONS/ACRONYMS

| | |
|------|-----------------------------|
| CAPs | Corrective Action Process |
| POC | Project Oversight Committee |
| PSC | Project Safety Committee |
| RSO | Radiation Safety Officer |

4.0 REFERENCES

- 4.1 NUREG-1757, *Consolidated NMSS Decommissioning Guidance*, September 2002.
- 4.2 SNM-33, Hematite Special Nuclear Material License

5.0 RESPONSIBILITIES

Whenever change to existing policies and procedures is considered, the modification should be evaluated to address the potential impact on project requirements. The following responsibilities are assigned for the evaluation:

5.1 Project Director

The Project Director has overall responsibility to ensure that project controls are in place and effectively assess changes.

5.2 Manager, Regulatory and Licensing

The Manager, Regulatory and Licensing is responsible completion of the Modification Review Form in accordance with this procedure.

5.3 Plant Safety Committee/Project Oversight Committee

The Plant Safety Committee/Project Oversight Committee (PSC/POC) is responsible for reviewing modifications determined to be significant by the Manager, Regulatory and Licensing. This shall be performed during the quarterly meetings or as needed.

5.4 Radiation Safety Officer

The Radiation Safety Officer (RSO) is responsible for reviewing modifications that affect radiological conditions.

5.5 Project Personnel

Project personnel are responsible for ensuring that modifications are reviewed in accordance with this procedure.

6.0 REQUIREMENTS**6.1 Changes to Policies and Procedures**

Changes to policies and procedures shall be documented. Prior to implementing a change, a Modification Evaluation Form should be completed by the Manager, Regulatory and Licensing. This form is provided in Appendix A. The cognizant manager shall document the desired change such that the appropriate radiological and regulatory evaluations can be performed. The reason for the change shall be clearly stated along with the any support documentation. Administrative modifications can be described simply as administrative. The change description and any support documentation should be verified by the Manager, Regulatory and Licensing in order to complete the modification evaluation.

General project oversight by way of operations, health physics, environmental, safety and health and quality assurance should verify that project personnel are following the revised policies and procedures. This oversight can be documented by the standard oversight forms.

Changes to policies or procedures that require NRC notification shall be reported to the NRC by the Manager, Regulatory and Licensing within 30 days of the change. If the proposed change requires a license amendment, the change will not be effective until after the amendment is approved by the NRC.

6.2 Licensing Evaluation

Modifications to the decommissioning program shall be evaluated to ensure that changes do not conflict with requirements specifically stated in the license or impair the ability to meet applicable NRC regulations. The licensing evaluation shall be documented by the Manager, Regulatory and Licensing on the form in Appendix A. The Manager, Regulatory and Licensing shall ensure that:

- License commitments are met
- There is no degradation in safety or environmental commitments that would need NRC approval
- The modification does not result in a significant adverse effect on the quality of work, the remediation objectives or health and safety
- The modification is consistent with the conclusions of actions analyzed in the Environmental Assessment, Environmental Impact Statement and Safety Evaluation Report, when applicable.

Evaluation of the modification will vary based on the type of modification. It is the Manager, Regulatory and Licensing's responsibility to ensure verification as needed to meet these evaluation standards.

6.3 Radiological Evaluation

Modifications to the decommissioning program shall be evaluated for radiological conditions such as surface and soil contamination to determine the potential doses to workers performing decommissioning activities. Verification of this evaluation shall be documented by the Manager, Regulatory and Licensing on the Modification Form in Appendix A. If the modification increases the potential dose to the worker justification needs to be provided to support the need for the change.

Modifications that affect radiological conditions shall require review from the RSO. As determined by the RSO, health physics personnel shall monitor the modification to ensure that radiological conditions do not exceed expected levels.

6.4 Records

Records generated by this procedure shall be numbered. The numbering system shall be sequential and tied to the document number the records support. These change numbers shall indicate the year and month of the change in addition to a sequential identifier. The format for the record number for Hematite policies and procedures shall be M-yy-mm-XX-XX-XX-R where,

M represents the record is a modification record
yy the two-digit year identifier
mm the two-digit month identifier



- X the document number of the policy or procedure
- R the revision number of the policy or procedure

For example, a change to the Project Management Plan, PO-DO-001 would be numbered M-0404-PO-DO-001-1

Modifications that are not specifically tied to a Hematite policy or procedure shall be numbered indicating the year and month of the change in addition to a sequential identifier as M-yymm-XXX where XXX is a sequential number for modifications that can be obtained from document control. If the modification documentation has a number associated with it, such as for a contractor document, than the modification number can use this number in combination with the numbering described above.

Modifications shall be documented on the form in Appendix A. This form shall be approved and maintained in the Westinghouse Electronic Document Management System (EDMS).

7.0 FORMS

Appendix A Modification Evaluation Form

8.0 APPENDICES

Appendix A Modification Evaluation Form

APPENDIX A

| MODIFICATION EVALUATION FORM | | |
|---|-----|--------------------|
| MODIFICATION NUMBER: | | COGNIZANT MANAGER: |
| DESCRIPTION OF CHANGE (attach additional pages as required): | | |
| PURPOSE/REASON FOR CHANGE (attach additional pages as required): | | |
| DESCRIPTION OF AFFECTED DOCUMENTS: | | |
| LIST OF GROUPS AFFECTED BY THE CHANGE: | | |
| ADDITIONAL QUESTIONS: | | |
| Does the modification impact the license requirements? | Yes | No |
| Are there any degradations to safety or environmental commitments that would need NRC approval? | Yes | No |
| Does the modification result in a significant adverse effect on the quality of work, the remediation objectives or health and safety? | Yes | No |
| Is the modification inconsistent with the conclusions of actions analyzed in the Environmental Assessment, Environmental Impact Statement and Safety Evaluation Report? | Yes | No |
| Does the modification have a potential to change radiological conditions? | Yes | No |

Manager, Regulatory and Licensing_____
Date