

DISCUSSION OF SIGNIFICANT STAKEHOLDER COMMENTS AND STAFF PATH FORWARD ON REMOVAL OF MATERIAL AFTER LICENSE TERMINATION

SUMMARY OF DRAFT GUIDANCE

In NUREG-1757, Draft Supplement 1, "Consolidated NMSS Decommissioning Guidance: Updates to Implement the License Termination Rule Analysis," the U.S. Nuclear Regulatory Commission (NRC) staff proposed a substantial revision of NUREG-1757, Vol. 2, Appendix G, Section G.1.1, "Structures Versus Equipment," to provide additional guidance on what building structure materials may be left onsite at license termination, and what radiological criteria should apply to this material. This subject is a follow-up to the License Termination Rule (LTR) Analysis issue of removal of residual contamination from an unrestricted use site after license termination. This guidance is important because once the site is released for unrestricted use under the LTR (10 CFR Part 20, Subpart E), there are no regulatory controls on the site.

In addition to revising Appendix G, Section G.1.1, the staff revised Section G.3, "References," to reflect the new references in Section G.1.1, and added a new subsection, "Current NRC Approach to Releases of Solid Material," to Section 15.11 of Vol. 1, Rev. 1, to provide information about the current approaches to releases of solid materials during facility operations.

SUMMARY OF STAKEHOLDER COMMENTS ON DRAFT GUIDANCE AND STAFF CONSIDERATIONS

Two States provided comments. Both comments dealt with clarification of the three acceptable approaches provided to determine what materials may be left in buildings at license termination. Neither commenter expressed opposition to the proposed draft guidance.

The staff plans to evaluate whether any changes are warranted to alleviate confusion, but does not plan significant changes to the guidance.