

NRR-PMDAPEm Resource

From: Mozafari, Brenda
Sent: Monday, April 20, 2015 8:52 AM
To: Mitchel.Mathews@exeloncorp.com; Simpson, Patrick R.:(GenCo-Nuc)
(patrick.simpson@exeloncorp.com)
Subject: FW: Draft-Dresden_RAIs_20 2002 request
Attachments: Dresden_RAIs_20 2002 request.docx

Also, during the call with Dresden, as I explain our regulations, environmental review, and process I will reference Office Instruction LIC-203. This OI is publicly available ([ML12234A708](#)) and just wanted to mention this to you so that you can forward on the ML No. to Dresden so that they can have the document in front of them during the call and it may also help explain our process.

800-857-6177 Participant passcode: 63027 #

From: Mozafari, Brenda
Sent: Wednesday, April 15, 2015 6:15 PM
To: Mitchel.Mathews@exeloncorp.com
Subject: Draft-Dresden_RAIs_20 2002 request

Mitch,

We are hoping to get a time for a call to discuss the attached points as Draft Potential RAI questions. I am sending the attachment for the telecom to take place as soon as you have the right personnel available. Suggesting Thursday afternoon.

Thanks
Brenda 415-2020

Hearing Identifier: NRR_PMDA
Email Number: 2011

Mail Envelope Properties (Brenda.Mozafari@nrc.gov20150420085200)

Subject: FW: Draft-Dresden_RAls_20 2002 request
Sent Date: 4/20/2015 8:52:17 AM
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From: Mozafari, Brenda

Created By: Brenda.Mozafari@nrc.gov

Recipients:

"Mitchel.Mathews@exeloncorp.com" <Mitchel.Mathews@exeloncorp.com>
Tracking Status: None
"Simpson, Patrick R.:(GenCo-Nuc) (patrick.simpson@exeloncorp.com)"
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Tracking Status: None

Post Office:

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MESSAGE	914	4/20/2015 8:52:00 AM
Dresden_RAls_20 2002 request.docx		37592

Options

Priority: Standard
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Reply Requested: No
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In accordance with 10 CFR 20.2002(b) and 10 CFR 51.41, provide the following information in order to allow for a thorough review and evaluation of the impacts associated with the request to dispose of contaminated soil in accordance with 10 CFR 20.2002.

Requests for Additional Information

General

GEN-1: Describe any alternatives considered to the proposed LAR, including treatment alternatives (if any), and alternative disposal sites considered (on-site and off-site).

GEN-2: Please clarify how the contaminated soil will be emplaced at the proposed disposal site to include the average and maximum thickness of the contaminated soil that will be managed at the site and the maximum dimensions of the controlled disposal area.

GEN-3: Clarify whether the soil will be mounded or placed in stockpiles (with dimensions and estimated volume by pile); placed uniformly on the land surface (provide areal extent and thickness of disposal layer); and/or placed in an excavated disposal cell(s) (provide dimensions of cell(s), number of cells, and thickness of disposal layer in cells).

GEN-4: Provide a summary (including mean and maximum concentration) of any other constituents (e.g., soluble salts and non-radiological contaminants, pH, metals, conductivity, etc.) for which sample results are available for the current soil inventory.

GEN-5: Describe whether there will be any engineered barriers in place at the proposed location to restrict access/prevent migration of soil (e.g. linings or coverings)?

GEN-6: How will the contaminated soil be transferred from its current location to the proposed disposal location onsite? Identify the equipment that will be used to transfer the soil, expected hours of use, and duration.

GEN-7: Provide a description of the current location and conditions of the soil. Is the soil currently monitored for radioactivity/leaching? Are there any engineered barriers in place to restrict access/prevent migration of soil (e.g. linings or coverings)?

GEN-8: Identify any State and local permits needed, or already obtained, in connection with the proposed action.

GEN-9: Provide a recent figure of the proposed disposal site that identifies the footprint dimensions of disposal.

GEN-10: Is the current location of the contaminated soil capable of storing future contaminated soil generated?

Water Resources

WTR-1: Provide a description of the best management practices that will be employed during disposal site operations to manage runoff, including any dust abatement runoff, from the

disposal area(s). Identify and describe the nature of any changes that would be made to the site's Storm Water Pollution Plan per Special Condition 10 of NPDES Permit No. IL0002224.

WTR-2: Please indicate and describe the nearest up-gradient and down-gradient groundwater monitoring wells (i.e., REMP or groundwater protection program wells) relative to the proposed disposal site, to include information on the constituents routinely monitored. Indicate whether the site's groundwater monitoring plan for these wells would need to be modified to detect any possible migration of the identified radiological constituents of concern in the material proposed for disposal. If proposed monitoring is planned, please provide information. If no additional monitoring is planned, please provide technical basis.

WTR-3: Identify whether the surficial (glacial) aquifer beneath the site is a current or potential future use of potable groundwater and provide a summary of available groundwater quality data including depth to groundwater and direction of groundwater flow.

WTR-4: Identify and provide a description (i.e., water use, depth, aquifer) of the nearest offsite supply wells proximal to the site owner-controlled area and disposal site.

WTR-5: Were pathways to surface water and groundwater considered in selection of the proposed disposal location? If so, please describe what factors were considered.

Terrestrial and Ecological Resources

ECO-1: Provide a description of any ground disturbing activities that would occur, including tree cutting, or land clearing, excavation, or grading. Describe any procedures Exelon follows prior to engaging in ground disturbing activities that may minimize impacts to ecological resources.

ECO-2: Provide a description of the ecological resources on or within the vicinity of the proposed disposal site, including prominent vegetation (e.g., tree, shrub, and grass species), wildlife (e.g., birds, mammals, and amphibians), aquatic resources (e.g., fish and shellfish), and protected resources (e.g., bald and golden eagles, migratory birds, State-listed species).

ECO-3: Fish and Wildlife Service describe four Federally-listed or proposed species that may occur in Grundy County, including the following:

- Indiana bat (*Myotis sodalis*), endangered
- Northern long-eared bat (*Myotis septentrionalis*), threatened
- Rattlesnake-master borer moth (*Papaipema eryngii*), candidate
- Eastern prairie fringed orchid (*Platanthera leucophaea*), threatened

Describe any known occurrences of these species on the Dresden site and near the proposed disposal site. Describe whether the proposed disposal site, or the area surrounding the proposed disposal site, provides potential habitat for any of these species. In addition, provide a brief summary of any studies that have been conducted that would have assessed the potential occurrence of these species or potential habitat for these species on the Dresden site.

In the Supplemental Environmental Impact Statement (SEIS) for the license renewal of Dresden, the NRC staff concluded that although no populations of the Indiana bat or eastern prairie fringed orchid are known to occur within the Dresden site, it is possible that undeveloped portions of the Dresden site could support these species. Further, the NRC staff concluded that continued operations would not impact these species because license renewal would not involve ground disturbing activities. Please provide an assessment of the potential impacts to the Indiana bat, northern long-eared bat, and the eastern prairie fringed orchid if the proposed action includes any ground disturbing activities.

ECO-4: Describe any restoration activities that would occur after the soil is disposed.

ECO-5: Describe any management activities or procedures that would minimize impacts to ecological resources from soil disposal. In addition, describe any monitoring or maintenance activities that currently occur at the location(s) where the soil is currently stored and describe any monitoring or maintenance activities that would occur on or near the proposed soil disposal site.

Air Quality and Noise

AIRN-1: Provide a description of the best management practices, if any, that will be employed during soil disposal/transfer and after the soil is disposed to manage fugitive dust emissions.

AIRN-1: Identify the distance of the nearest resident to the proposed disposal location.

Human Health

HH-1: Describe the worker protection measures that will be implemented for the transport of the soil to the disposal site? What controls will be in place to prevent migration of the soil during transport/transfer of the soil from its current location to the disposal site?

HH-2: Will monitoring of the onsite soil disposal be added to the radiological environmental monitoring program (REMP)?

HH-3: For the 6000 m³ of soil that is being proposed to dispose of onsite, the application provides methodology and calculations indicating that its average concentration will be kept to ≤ 20% of the DCGLs. However, a total waste disposal site of 20000 m³ is requested, to allow for future disposal of contaminated soils. What controls will be used to maintain the same average concentration of ≤ 20% of the DCGLs of any future soil added to the disposal site?

HH-4: The source term for this request is described as “soils and sewage treatment drying bed wastes.” What is the radiological makeup of the sewage treatment drying bed wastes, as they are not described in the LRA? If the sewage drying bed wastes radiological makeup is different from the soil, what controls will be used to ensure that the concentrations do not exceed the decommissioning disposal criteria? What controls will be used to maintain the same average

concentration of $\leq 20\%$ of the DCGLs with the addition of future soils and sewage treatment drying bed wastes to the initial 6000 m³ of soils at the proposed disposal site?

HH-5: Will your 20.2002 disposal criteria be added to your Offsite Dose Calculation Manual (ODCM)?