

RAI 13:

Description of Deficiency: Staff cannot complete its evaluation of NUREG-1569, Acceptance Criterion 2.9.3(2).

Basis for Request: 10 CFR Part 40, Appendix A, Criterion 7, requires: “At least one full year prior to any major site construction, a preoperational monitoring program must be conducted to provide complete baseline data on a milling site and its environs. Throughout the construction and operating phases of the mill, an operational monitoring program must be conducted to measure or evaluate compliance with applicable standards and regulations; to evaluate performance of control systems and procedures; to evaluate environmental impacts of operation; and to detect potential long-term effects.” RG 4.14 provides guidance on the preoperational and operational aspects of effluent and environmental monitoring at uranium mills. NUREG-1569, Acceptance Criterion 2.9.3(2), states: “Soil sampling is conducted at both a 5-cm [2-inch] depth as described in Regulatory Guide 4.14, Section 1.1.4 (NRC, 1980) and 15 cm [6 in] for background decommissioning data.” During its review, NRC staff found no 15-cm soil samples proposed in the TR.

Request for Additional Information: Please provide justification for not performing soil samples at 15-cm depths, or indicate where this can be found in the TR.

RAI 13 Response (05/21/15):

Section 2.9.6 has been revised and the sampling results are presented in their entirety in Appendix BB, Tetra Tech (2015) Report; Section 4.1.1.3.