



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001**

October 17, 2016

MEMORANDUM TO: Bruce A. Watson, CHP, Chief  
Reactor Decommissioning Branch  
Division of Decommissioning, Uranium Recovery  
and Waste Programs  
Office of Nuclear Material Safety  
and Safeguards

FROM: Marlayna Vaaler, Project Manager  
Reactor Decommissioning Branch  
Division of Decommissioning, Uranium Recovery  
and Waste Programs  
Office of Nuclear Material Safety  
and Safeguards

LICENSEE: Dairyland Power Cooperative

FACILITY: La Crosse Boiling Water Reactor

SUBJECT: SUMMARY OF THE SEPTEMBER 20, 2016, PUBLIC MEETING WITH  
DAIRYLAND POWER COOPERATIVE AND LA CROSSE SOLUTIONS  
REGARDING THE LICENSE TERMINATION PLAN AND PARTIAL SITE  
RELEASE FOR THE LA CROSSE BOILING WATER REACTOR

Background

On September 20, 2016, a Category 3 public meeting was held between U.S. Nuclear Regulatory Commission (NRC) staff, representatives of Dairyland Power Cooperative (DPC) and LaCrosseSolutions (LS, the licensee), members of the public and interested stakeholders at the Courtyard La Crosse Downtown / Mississippi Riverfront, 500 Front Street South, La Crosse, Wisconsin. The purpose of the meeting was to discuss DPC and LS's plans and schedule regarding the recently submitted License Termination Plan (LTP) and Partial Site Release Request for the La Crosse Boiling Water Reactor (LACBWR) in Genoa, Wisconsin, as well as the NRC's ongoing review and overall process for approving the submittals.

The meeting notice dated August 28, 2016, can be found in the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML16241A005. A list of attendees is provided in Enclosure 1 (note that the names of some participants were not captured).

Meeting

On September 20, 2016, the NRC staff held a public meeting with DPC and LS to discuss the plans and schedule regarding the License Termination Plan for LACBWR that would allow for the completion of decommissioning activities and termination of Facility Operating License

DPR-45 for the LACBWR facility. The LACBWR LTP was submitted on June 27, 2016, and is available at ADAMS Accession No. ML16200A095. The September 20<sup>th</sup> meeting was also held to discuss the plans and schedule regarding a Partial Site Release for LACBWR that would allow for the portions of the site which have been classified as radiologically non-impacted from La Crosse's previous operation to be released from the NRC license before the license is terminated. The LACBWR Partial Site Release request was submitted on June 27, 2016, and is available at ADAMS Accession No. ML16181A068.

Representatives from DPC and LS gave a presentation on the LTP and the overall LACBWR decommissioning strategy and timeline. This presentation is provided as Enclosure 2 and can be found in ADAMS at Accession No. ML16286A059. The NRC staff also gave a presentation to provide an overview of the regulatory process for decommissioning, the NRC's review and acceptance standards for the LTP and Partial Site Release, and the ongoing oversight activities that LACBWR will be subject to until the license is terminated. This presentation is provided as Enclosure 3 and can be found in ADAMS at Accession No. ML16286A056. At the end of the meeting, members of the public and interested stakeholders were invited to ask questions, provide feedback, and make comments on the LACBWR LTP and Partial Site Release. Many of these comments were able to be addressed by the NRC, DPC, and LS staff members present at the meeting, and the major comments are summarized in Enclosure 4.

During the meeting, LS discussed the history of the LACBWR site, the decommissioning activities completed to date, and the current LACBWR decommissioning process and remaining activities and how they will be addressed during implementation of the LTP. LS also provided a summary of the overall decommissioning approach being used to conduct activities at the site, gave an overview of the schedule of upcoming milestones for both DPC and LS, and discussed the contents of each chapter of the LTP. As of the meeting, DPC / LS estimates that all component removal, building demolition, transportation and disposal of radiological waste, and site remediation would be completed by early 2018. Final status surveys would be completed by mid-2018 and the license would be terminated in 2019.

DPC and LS also discussed some of the technical approaches used in the LTP, including the site characterization summary, the survey unit classifications for the site, the groundwater evaluations conducted to date, the identified radionuclides present at the site, the radiological dose modeling assumptions used as the basis for creating LACBWR's derived concentration guideline levels (DCGLs), and the final radiation survey plan. Depictions and descriptions of what would remain at the site at the end of the remediation efforts were also provided.

Because DPC recently transferred the LACBWR operating license to LS, the benefits of this transfer were also discussed by LS and DPC, including leveraging the technical experience of EnergySolutions in the fields of decommissioning and waste management and disposal, accelerating the overall decommissioning schedule for LACBWR, thereby reducing the radiological source term, and providing additional assurances beyond the LACBWR decommissioning trust fund that all decommissioning activities will be completed in a timely fashion. Finally, LS discussed the additional environmental impact information that will be provided in the LTP and stated it will be bounded by NUREG-0586, "Final Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities."

During the meeting, the NRC staff discussed the review process and timeline for the LACBWR LTP, which will include an acceptance review, a detailed technical review, requests for

additional information as needed, in-process inspections by the NRC's independent contractor to confirm the results of the remediation activities, and final approval of the LTP via a license amendment, which will provide the opportunity for the public to make comments or request a hearing before the LTP is finalized. The NRC staff also provided an overview of the ongoing inspection activities at LACBWR, and how these oversight activities will be adjusted commensurate with the increased level of activity at the site during the license termination phase. Specifically, comprehensive inspections will continue in the areas of operations and maintenance, radiation protection, security, and spent fuel safety.

Finally, the NRC staff discussed the LACBWR partial site release, which would remove approximately 88 of the 165 acres of the site from the NRC license, including components of the Genoa Generating Station coal-fired power plant, which remains operational. The areas to be removed and released are those which have been classified as radiologically non-impacted from La Crosse's previous operation; this classification will be confirmed by an independent NRC confirmatory survey of these areas before the partial site release is approved. LS requested approval of the partial site release by March 2017 in order to simplify and streamline the remaining license termination activities within a smaller licensed site.

Before the close of the meeting, the NRC staff and representatives from DPC and LS received feedback and answered questions from members of the public and other stakeholders on the LACBWR LTP and Partial Site Release request. The comments and questions received are summarized in Enclosure 4, and focused primarily on the continued safe storage of the spent nuclear fuel at the LACBWR site and concerns over the environmental impacts of the ongoing license termination activities. No Public Meeting Feedback forms were received.

Please direct any inquiries to me at 301-415-3178 or by e-mail at [marlayna.vaaler@nrc.gov](mailto:marlayna.vaaler@nrc.gov).

Sincerely,

*/RA/*

Marlayna Vaaler, Project Manager  
Reactor Decommissioning Branch  
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Office of Nuclear Material Safety  
and Safeguards

Docket Nos. 50-409 and 72-046  
License No. DPR-45

Enclosures:

1. List of Attendees
2. DPC / LS Presentation Slides
3. NRC Presentation Slides
4. Summary of Public Comments

cc w/enclosures: La Crosse Boiling Water Reactor Service List

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Sincerely,  
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cc w/enclosures: La Crosse Boiling Water Reactor Service List

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**ADAMS Accession No. ML16286A050**

OFFICE	NMSS/RDB/PM	NMSS/RDB/LA	NMSS/RDB/BC	NMSS/RDB/PM
NAME	MVaaler	CHolston	BWatson	MVaaler
DATE				

**OFFICIAL RECORD COPY**

LIST OF ATTENDEES  
SEPTEMBER 20, 2016, PUBLIC MEETING WITH  
DAIRYLAND POWER COOPERATIVE AND LACROSSE SOLUTIONS  
LICENSE TERMINATION PLAN AND PARTIAL SITE RELEASE FOR  
THE LA CROSSE BOILING WATER REACTOR

U.S. Nuclear Regulatory Commission

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George Nygard  
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\*note that name spelling is approximate

**Enclosure 2**

**Dairyland Power Cooperative  
and LaCrosseSolutions  
Presentation Slides**

**ML16286A059**

**Enclosure 3**

**U.S. Nuclear Regulatory Commission  
Presentation Slides**

**ML16286A056**

Enclosure 3

SUMMARY OF COMMENTS FROM THE  
SEPTEMBER 20, 2016, PUBLIC MEETING WITH  
DAIRYLAND POWER COOPERATIVE AND LACROSSE SOLUTIONS  
TO DISCUSS THE LICENSE TERMINATION PLAN AND PARTIAL SITE RELEASE  
FOR THE LA CROSSE BOILING WATER REACTOR

During the public comment portion of the LACBWR LTP public meeting, the NRC staff and representatives from DPC and LS received feedback and answered questions from members of the public and other stakeholders on the LACBWR LTP and Partial Site Release request. Questions and feedback were received on the following topics:

- Process for addressing the discovery of additional residual radioactivity beyond what was accounted for during site characterization activities. LS noted that the residual radioactivity at the LACBWR site will be remediated to a level that ensures the site may be released for unrestricted use, and that a contingency fund is in place in the event that residual radioactivity is identified that exceeds the current plans and cost for site remediation.
- The process for the open air demolition of buildings at the LACBWR site that will be removed as low level radiological waste. The NRC staff noted that open air demolition will use a water mist to control dust, and that this water will be collected and processed as low level waste, thereby ensuring that no additional contamination is introduced at the site.
- Which below grade and other structures will remain at the time of license termination. LS provided an overview of what the final site status would be after license termination, including the remaining buildings and basements at the LACBWR site; the basements will be filled with radiologically "clean" dirt to three feet above grade and left in place.
- The impacts of dismantlement and decontamination activities on the groundwater and Mississippi River, specifically in regard to potential releases of tritium to the river and how rainfall and river water levels could affect or be affected by decommissioning activities. The NRC staff noted that all water collected during the decommissioning process will be processed as low level waste, ensuring that no additional contamination is introduced.
- Groundwater monitoring requirements after the NRC license is terminated. The NRC staff noted that while the NRC requirements will no longer be in effect, the State of Wisconsin could require additional monitoring to continue if they choose to do so.
- Long term consequences and planning for waste storage. DPC noted that all low level waste will be removed from the site and they will continue to operate and fund the LACBWR Independent Spent Fuel Storage Installation until such time as the fuel is permanently removed from the site and possession is transferred to the U.S. Department of Energy.



- The requirements and procedures for the shipment of low level radioactive waste, including the provisions for addressing accidental releases in transit or other unexpected occurrences, as well as who maintains overall liability during the waste shipments. The NRC staff noted that federal requirements are imposed by the U.S. Department of Transportation for the shipping of radiological wastes, and that oversight responsibilities, as well as liability for any accidental releases, remain with the licensee during the shipment process.
- Many members of the public noted that there have been some instances of the railways around the La Crosse area not being properly maintained, which has led to derailments or other accidents. LS noted that the current plan for the rail shipment of the low level radiological waste is on a different rail system than the one that has recently experienced issues, the containers used to ship the waste are enclosed and robust enough to withstand most derailments, and plans are in place for addressing any accidents.
- The use of the decommissioning trust funds by LS now that the NRC license has been transferred from DPC. DPC explained the process for LS requesting funds from the LACBWR decommissioning trust and noted that the costs must be associated with legitimate decommissioning expenses, as outlined in the agreement between the two parties and in accordance with the NRC requirements for decommissioning funding.
- The use of decommissioning trust funds for other purposes than radiological decommissioning. The NRC staff noted that the LACBWR decommissioning trust fund contains enough funding to ensure that radiological decommissioning at the site can be completed; any remaining funds will be used at the licensee's discretion (e.g., for site restoration), typically with the input of the State and other stakeholders.
- Long term funding needs for the Independent Spent Fuel Storage Installation and how those funds will be collected under the DPC power cooperative structure. DPC noted that the LACBWR Independent Spent Fuel Storage Installation (including eventual decommissioning) will continue to be funded throughout its service lifetime using the same mechanisms currently in place to collect revenue.
- The utilization of the LACBWR community advisory committee during the license termination process. DPC and LS noted that the level of engagement with the committee will likely increase as the decommissioning activities increase at the LACBWR site.

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