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MAY 31 1985

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Docket No. 40-1341  
04001341270E

MEMORANDUM FOR: Docket File No. 40-1341

FROM: Randall F. Brich, Project Manager  
Licensing Branch 1  
Uranium Recovery Field Office, Region IV

SUBJECT: REVIEW OF QUALITY CONTROL PROGRAM - TVA  
EDGEMONT DECOMMISSIONING PROJECT

## BACKGROUND

By letter dated May 13, 1985, TVA submitted a description of the operational, radiological safety and environmental quality control programs for NRC review and approval. The letter stated that TVA, in conjunction with Silver King Mines, Inc. (SKM), is currently preparing a detailed construction quality control program which would be available on-site to reaffirm TVA's and SKM's commitment to construction using best management practices.

## DISCUSSION

The following discussion presents the TVA operational, radiological safety and environmental quality control programs as they relate to the Edgemont decommissioning project.

Operational Quality Control

TVA's Office of Nuclear Power (ONP) and its Uranium Operations Branch (UOB), Division of Nuclear Services, maintains an office in Casper, Wyoming. The UOB ensures that the Edgemont decommissioning plan is properly implemented by having a full-time TVA representative on-site during key decommissioning activities at both the existing mill site and

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disposal site. Key decommissioning activities include, but are not limited to, clay perimeter liner, the clay cap, the containment dam foundation core and drains, the riprapped drainage channels and the riprapped downstream slope of the dam, the evaporation pond, placement of building rubble and radiological site cleanup activities. Thus, UOB is responsible for the project operational quality control program.

TVA, the licensee, has the responsibility for guaranteeing that prudent construction practices are followed and that the operator, SKM, diligently and effectively performs all required testing and inspection during the construction. TVA project representatives visit the site on a frequent, irregular and sometimes unannounced basis to observe on-site material handling and construction operations. The project representative examines operations, observes inspection personnel and documents his findings. Also, a decommissioning project representative observes on-site soils tests in progress and other activities of geotechnical personnel. TVA management is apprised of the written and documented observations of decommissioning project activities, and these become a part of the project records. Should substandard operator, inspector, or technician performance be observed, immediate corrective action is initiated with SKM. These actions are appropriately documented, and SKM is required to submit weekly reports documenting the frequency and type of in-situ and laboratory tests and analyses performed during each week. All project records defined as contractual or quality assurance records, pursuant to Titles 10 and 41 of the Code of Federal Regulations, are maintained as U.S. Federal records.

#### NRC Review Comments

Based on my review of the TVA operational quality control program, it is apparent that TVA is committed to an active oversight role that ensures construction will be in accordance with all respective NRC requirements. However, it is the staff's understanding that included among the key activities which will be supervised by a full-time TVA representative are the construction of the clay liner on the upstream face of the containment dam and backfilling around the building debris. Also, the staff understands that a qualified TVA radiological representative will oversee all radiological site cleanup activities.

In addition the staff will require that TVA guarantee the independence of the SKM construction inspector and his freedom from employer reprisal should he report inadequate construction practices.

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Radiological Safety Quality Control

TVA's ONP and its Radiological Health Staff (RHS) plan, develop and interpret policy for radiation protection and control programs for TVA activities where radiation and radioactive materials are used, such as the Edgemont Decommissioning Project.

The RHS evaluates the adequacy of the implementation of the radiation protection program as well as providing radiological analyses of environmental samples, personnel dosimetry and health physics services for the decommissioning project.

In this regard, TVA states that the project Health Physics Manual (HPM) defines radiation protection requirements and requires SKM to implement the program as defined. RHS tracks all SKM radiological work activities, provides assistance as necessary, reviews procedural, operational and radiological aspects of SKM activities to assure adherence to the HPM. The RHS Policy and Technical Staff performs routine annual independent oversight reviews and evaluations of the radiological protection program.

NRC Review Comment

Staff review indicates that the radiological safety quality control program covers all aspects of NRC concern and is, therefore, adequate.

Environmental Quality Control

TVA's Environmental Quality Staff (EQS) and Office of Natural Resources (ONR) maintain an office in Casper, Wyoming, to ensure that the TVA objectives in Code IX Environmental Quality are achieved and to provide technical expertise to the Division of Nuclear Services (DNS). On a real-time basis, the EQS is cognizant of and realizes a thorough understanding of the plans and activities of the project. The EQS conducts technical and corporate office and field reviews and inspections of DNS and its contractor activities to ensure and document the level of compliance with license requirements.

Findings of the interdisciplinary inspection and audit team are documented to DNS after each visit and contain specific issues of concern and recommendations of corrective actions, as necessary. These corrective action items are maintained on file until satisfactorily addressed and documented by subsequent audits or written correspondence from DNS.

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NRC Review Comment

The staff has reviewed the environmental quality control program and has determined it to be adequate.

## CONCLUSIONS AND RECOMMENDATIONS

Based on my review, I conclude that the project quality control program sufficiently addresses NRC concerns. However, certain areas require additional clarification. These areas are as follows:

- 1) Key activities, which require the presence of a TVA representative, shall include construction of the clay liner on the upstream face of the containment dam and backfilling around building rubble.
- 2) A qualified TVA representative shall oversee all radiological cleanup activities.
- 3) TVA shall provide written assurance that the SKM construction inspector is independent and free from reprisals should he report any inadequacies in the construction program.

Therefore, I recommend that TVA be notified of the staff findings.

/s/

Randall F. Brich, Project Manager  
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/s/

Approved by:

Edward F. Hawkins, Chief  
Licensing Branch 1  
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