

Docket File 40-1341  
 LFMB/DCS/PDR  
 DBangart, RIV  
 RBrich  
 URFO r/f  
 SDDWNR  
 JRobertson, RCPD, SD

40-1341/RFB/85/01/14/0

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Enclosure 2

URFO:RFB  
 Docket No. 40-1341  
 SUA-816, Amendment No. 16  
 04001341316E

MEMORANDUM FOR: Docket File No. 40-1341

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

SUBJECT: ADDITION OF STANDARD LICENSE CONDITIONS - TVA  
 EDGEMONT DECOMMISSIONING PROJECT

Background

The existing Source Material License (SUA-816) has been recently revised (see memorandum to Docket File No. 40-1341, dated July 15, 1985). License review during the revision process identified several deficient areas. The following additional license conditions address those deficient areas.

Discussion

The Uranium Mill Radiation Control Act of 1978 amended the Atomic Energy Act of 1954, as amended, by the addition of Section 83(a)(2) which requires that the license specifically provide for transfer of ownership of the disposal site, where byproduct material is disposed, to the U.S. Government or the State, at the State's option. Since the existing license (SUA-816) does not provide for the transfer of ownership of the disposal site to the U.S. Government or the State. The license should be amended to allow for this transfer. Therefore, License Condition No. 26 should be added to read as follows:

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26. Prior to termination of this license, the licensee shall provide for transfer of title to byproduct material and land, including any interests therein (other than land owned by the United States or the State of South Dakota), which is used for the disposal of such byproduct material or is essential to ensure the long term stability of such disposal site to the United States or the State of South Dakota, at the State's option.

By letter dated April 10, 1985, TVA provided revision 3 of the project Health Physics Manual (HPM). The HPM specifies the basic radiation protection program applicable to the project. Section 2.3 of the HPM states the licensee's commitment to an ALARA program, however, no specific discussion is provided for implementation of such a program. One mechanism for assuring that an effective ALARA program is administered is through annual ALARA audits as recommended by Section 2.3.3 of Regulatory Guide 8.31 entitled, "Information Relevant to Ensuring that Occupational Radiation Exposures At Uranium Mills Will Be As Low As Is Reasonably Achievable." Since the existing license (SUA-816) does not require annual ALARA audits, the license should be amended to require ALARA audits and report submittal to URFO. Therefore, License Condition No. 27 should be added to read as follows:

27. The licensee shall conduct an annual ALARA audit of the radiation safety program and shall submit a written report to the corporate management. The ALARA audit report shall summarize at least the following data:
- A. Employee exposure records (external and internal time weighted calculations).
  - B. Bioassay results.
  - C. Inspection log entries and summary reports of daily, weekly and semi-monthly inspections.
  - D. Documented training program activities.
  - E. Radiation safety meeting reports.
  - F. Radiological survey and sampling data.

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- G. Reports on overexposure of workers submitted to USNRC or State.
- H. Operating procedures that were reviewed during this time period.

The report should specifically discuss the following:

- 1. Trends in personnel exposures for identifiable categories of workers and types of operational activities.
- 2. Whether equipment for exposure control is being properly used, maintained, and inspected.
- 3. Recommendations on ways to further reduce personnel exposures from uranium and its daughters.

A copy of the ALARA audit report shall be sent to the USNRC, Uranium Recovery Field Office, within one (1) month of issuance to the licensee's senior management.

The licensee has committed to specific lower limits of detection (LLD) for environmental sample analysis in their February 5, 1985 submittal. Since the existing license (SUA-816) does not explicitly state the required lower limits of detection for environmental sample analysis, the license should be amended to require adherence to the referenced LLDs. Therefore, License Condition No. 14 should be revised, by the addition of Section F, to read as follows:

- 14. The licensee shall implement the monitoring programs described in Section 4.2 of the FES; the licensee's December 29, 1982 submittals, and Enclosure B of the licensee's November 2, 1982 submittal.
  - A. The licensee shall relocate the nonradiological surface water quality monitoring samplers identified as Cheyenne River Control and Cottonwood Creek Control stations as stated in Section C.1 of the monitoring report referenced in their letter dated June 28, 1983.
  - B. The licensee shall relocate the disposal site spoil pile sediment sampling location as stated in their letter dated October 27, 1983.

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- C. The licensee shall modify the modification of the fish and benthic organism monitoring program as stated in their submittal dated December 21, 1983.
- D. The licensee shall perform either radon or radon progeny monitoring at the five offsite radiological air monitoring stations utilizing either the alpha track or active radon progeny sampling detectors, respectively, as stated in their submittal dated February 5, 1985.
- E. The licensee shall perform nonradiological surface water quality sampling for turbidity and the required parameters, if necessary, as stated in their submittal dated February 5, 1985.
- F. The licensee shall comply with the lower limits of detection as per the HASL-300 method as specified in their submittal dated February 5, 1985, for the analysis of samples collected pursuant to the environmental monitoring program.

All results of the effluent and environmental monitoring program shall be reported within ninety (90) days following the close of the associated monitoring period with copies of the report sent to the USNRC, Uranium Recovery Field Office. This data shall be reported in a format similar to that contained in Attachment A of this license entitled, "Sample Format for Reporting Monitoring Data." The data shall be evaluated for trends, and any significant deviations will be noted and discussed in the associated report.

#### Conclusion

My review of the subject source material license (SUA-816) indicates the need for additional license conditions that are directly related to the decommissioning activities. These additional license conditions will not cause any undue hardship to the licensee. These license conditions are necessary to clarify NRC's original intent and to provide a quantifiable mechanism to evaluate the efficacy of the decommissioning project.

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Therefore, I conclude that SUA-816 should be amended and revised as discussed above.

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

Original Signed by  
Edward F. Hawkins

Approved by:

Edward F. Hawkins, Chief  
Licensing Branch 1  
Uranium Recovery Field Office, Region IV

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