



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

JAN 02 1997

Wesley C. Patrick, President
Center for Nuclear Waste
Regulatory Analyses
6220 Culebra Road
PO Drawer 28510
San Antonio, TX 78228-0510

Dear Mr. Patrick:

Subject: Task Order No. 8(H) Entitled, "Revise the Standard
Review Plan for Uranium-Recovery Reclamation
Plans", Under Contract NRC-02-96-004

This confirms verbal authorization provided to Pat Mackin, of your staff, from Deborah Neff, of my staff, on December 17, 1996, to commence work under the subject task order on December 18, 1996, with a temporary ceiling of \$20,000.

In accordance with the task order procedures of the subject contract, this letter definitizes Task Order No. 8(H). This effort shall be performed in accordance with the enclosed Statement of Work and the Contractor's technical proposal dated November 12, 1996 and as revised on December 16, 1996, which are hereby incorporated by reference and made a part of this task order. The effective date of this task order shall be December 18, 1996.

Task Order No. 8(H) shall be in effect from December 16, 1996 through September 26, 1997 with a cost ceiling of \$82,767. The amount of \$75,973 represents the total estimated reimbursable costs, the amount of \$2,236 represents the cost of facility capital, and the amount of \$4,558 represents the fixed fee for this task order.

The amount currently obligated is \$82,767.

The obligated amount shall, at no time, exceed the task order ceiling. When and if the amount(s) paid and payable to the Contractor hereunder shall equal the obligated amount, the Contractor shall not be obligated to continue performance of the work unless and until the Contracting Officer shall increase the amount obligated with respect to this task order. Any work undertaken by the Contractor in excess of the obligated amount specified above is done so at the Contractor's sole risk.

Accounting Data for Task Order No. 8(H) is as follows:

B&R No.: 75015233000
JC No.: J5158
BOC: 252A
Appn. No.: 31X0200
Obligated: \$82,767

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NRC-02-96-004 PDR

The following individuals are considered to be essential to the successful performance of the work hereunder: Dr. Amitava Ghosh, Dr. Goodluck Ofoegbu, Dr. Mark Jarzemba, and Dr. Asadul Chowdhury.

The Contractor agrees that such personnel shall not be removed from the effort under the task order without compliance with Contract Clause H.1 Key Personnel. Further, any consultants that the Contractor plans to utilize under this task order must be approved by the NRC Contracting Officer before that consultant may begin work under this task order.

Your contacts during the course of this task order are:

Technical Matters: Deborah DeMarco
Project Officer
(301) 415-7796

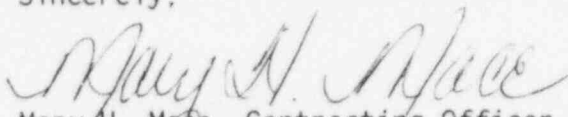
Contractual Matters: Deborah Neff
Contract Specialist
(301) 415-8160

The issuance of Task Order No. 8(H) does not change any terms and conditions of the subject contract.

Please indicate your acceptance of Task Order No. 8(H) by having an official authorized to bind your organization, execute three (3) copies of this document in the space provided and return two (2) copies to the U.S. Nuclear Regulatory Commission, Attn: Ms. Deborah Neff, ADM/DC/TAB1, Mail Stop T-712, Washington, DC 20555. You should retain the third copy for your records.

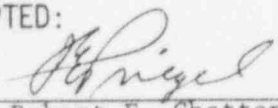
If you have any questions regarding this matter, please contact Ms. Neff on (301) 415-8160.

Sincerely,


Mary H. Mace, Contracting Officer
Technical Acquisition Branch No. 1
Division of Contracts
Office of Administration

Enclosure: As stated

ACCEPTED:


Name Robert E. Chatten

Director, Contracts
Title

January 22, 1997
Date

3.8 TASK ORDER 08: REVISE THE STANDARD REVIEW PLAN FOR URANIUM RECOVERY RECLAMATION PLANS

3.8.1 Objective

The objective of this task order is to update the geotechnical engineering, radon barrier design, and soil cleanup chapters of the standard review plan for Uranium Recovery (UR) Title I reclamation review plan and to provide similar chapters for a Title II review plan. It will include preparation of storyboards, as defined through the Nuclear Regulatory Commission (NRC) Business Process Redesign (BPR) initiative. These storyboards will subsequently be expanded into the review plan chapters. This task order will also refine the Center for Nuclear Waste Regulatory Analyses (CNWRA) familiarity with the specific regulatory and technical requirements related to these aspects of the regulation of uranium mill tailings sites by providing direct experience in preparing review procedures and acceptance criteria. This experience will be directly conveyed to fee-recoverable work.

3.8.2 Scope

This task order will include all activities necessary to support preparation and revision as appropriate of the geotechnical engineering, radon barrier design, and soil cleanup chapters of standard review plans for UR Title I and Title II reclamation plans. These activities will include: (i) reviewing NRC files and those of other regulatory agencies [e.g., individual states and the Environmental Protection Agency (EPA)]; (ii) consulting with NRC staff (at CNWRA, by teleconference, and through travel to NRC headquarters); (iii) a visit to an active uranium mill tailings site in Texas; (iv) preparing storyboards for each review plan section and revising them, as necessary, based on interactions with NRC staff; (v) preparing drafts of the review plan chapters; and (vi) submitting final review plan chapters that incorporate NRC staff comments on the drafts. This task order will specifically not include items that should be charged to licensees or applicants as fee-recoverable work.

3.8.3 Technical Approach

An orientation visit, including a trip to a uranium mill tailings site, was conducted in association with other task orders under this contract. Since CNWRA will be directly involved with the regulatory process, it will be essential that contact with NRC counterparts be established early for the purpose of developing a refined understanding of the regulatory framework. In preparation for these initial contacts, CNWRA staff selected for this work will be directed to conduct an initial reading of appropriate sections of 10 CFR Part 40.

In coordination with the NRC technical manager (TM) and project officer (PO), the CNWRA project manager (PM) will obtain appropriate reference materials (regulatory guides, technical papers, examples of licensing documents and reviews) from the NRC. These materials will be sorted based upon their technical content and will be provided to the appropriate member(s) of the CNWRA technical staff for review. These reviews will focus on the materials of the greatest regulatory and technical relevance as determined in consultation with the NRC TM.

As these activities are carried out, CNWRA staff will interface with NRC counterparts by telephone and by travel to NRC headquarters. Some background and reference documents are available only at NRC offices, and searches of these records may be required. CNWRA Washington Office staff may be utilized to investigate documents that are available only at NRC headquarters facilities. When possible, the NUDOS electronic access capabilities and microfiche files at CNWRA will also be used to support records searches.

As the first step in the review plan development process, storyboards will be developed using techniques developed through the NRC BPR initiative. The storyboards will be prepared to match the structure provided by the NRC document "Final Standard Review Plan for the Review and Remedial Action of Inactive Mill Tailings Sites Under Title I of the Uranium Mill Tailings Radiation Control Act." A review of a range of NRC, State, EPA, and public documents for the purpose of identifying the regulatory and environmental concerns associated with geotechnical and radon barrier aspects of reclamation will be conducted to support storyboard development. NRC staff will also be interviewed as a source for identifying these concerns. Each storyboard will document applicable regulations and guidance documents, licensing precedent, Agreement State experience, and technical/regulatory concerns and problem areas. Storyboards will be submitted to the NRC TM for review and comment as they are completed. NRC and CNWRA staff will maintain a continuing communication on the refinement of the storyboards via FAX, E-mail, or telephone conversation. Any conflict among NRC comments will be addressed to the TM by the CNWRA PM. The CNWRA staff will continue to work on review plan chapter development while awaiting any NRC comments.

The storyboards will then be used to prepare the review plan chapters. The NRC document "Final Standard Review Plan for the Review and Remedial Action of Inactive Mill Tailings Sites Under Title I of the Uranium Mill Tailings Radiation Control Act" will be used as guidance. First, CNWRA will prepare draft review plan chapters for the geotechnical engineering, radon barrier design, and soil cleanup sections of Title I and Title II review plans by expanding the storyboards. These drafts of the complete review plan chapters will be prepared in accordance with established format. They will contain options for review procedures and their associated acceptance criteria, incorporating both qualitative and quantitative methods. The review plan chapters must also identify technical and regulatory concerns likely to be contained in applications, and any scenarios or limitations applicable to specific methods or review procedures. The review procedure and acceptance criteria options must draw upon previous NRC review precedent, NRC staff operational experience, inspection results from various sites, and the results from the literature review. Review procedures and acceptance criteria must be directly related to the associated regulatory requirements and must lead to and be compatible with the "conclusions" sections of the review plan. The draft review plan chapters will be submitted to the NRC as a formal deliverable for review and comment.

After incorporating any staff comments, CNWRA will submit the final review plan chapters. These review plan chapters will be prepared using standard NRC format and style and must be camera ready for publication as a NUREG.

3.8.4 Staffing and Management

The CNWRA will provide the services of geotechnical engineers and health physicists who have an understanding of uranium mining operations and disposal cells. All participants must have an understanding of the NRC regulatory process.

Dr. Amitava Ghosh (Senior Geotechnical Engineer) will serve as principal investigator (PI) for this task order. He will be responsible for accomplishing the task order scope on schedule and within cost. The PI will have frequent contacts with the NRC TM and PO either by telephone or in person through visits to the NRC. The PI will coordinate input and supporting reviews by CNWRA staff as required. Specifically, Dr. Goodluck Ofoegbu (Senior Geological Engineer), Dr. Mark Jarzempa (Nuclear Engineer and Health Physicist), and Dr. Asadul Chowdhury (Civil Engineer) will assist Dr. Ghosh in the execution of this task order. Mr. Pat LaPlante (Environmental Research Scientist) who resides in CNWRA Rockville office will maintain frequent contact with the NRC TM and PO to assure that activities requiring immediate action receive proper response. Mr. Pat Mackin will be the CNWRA PM for the entire UR project including geotechnical work. He will be responsible for coordinating all UR task orders and will also assure integration of the work. Management oversight will be provided by Dr. Budhi Sagar (CNWRA Technical Director) and Dr. Wesley Patrick (CNWRA President).

The total resources allocated to this task order are 624 staff-hours. These hours are allocated approximately as: geotechnical engineering (500), health physics (70), and the remaining for additional support, internal reviews of CNWRA input, and management oversight. The following other CNWRA staff members have the skills necessary to complete this task order and will be utilized by the PI as necessary: S. Hsiung, R. Chen, W. Patrick, and M. Ahola.

The task order will be executed under the NRC approved CNWRA quality assurance program currently in effect for all NRC work. The PI and other participating staff will be available for teleconferences or face-to-face meetings to meet the needs of the project.

3.8.5 Deliverables and Schedule

Table 3-13 presents the deliverables associated with this task order. These dates are based on the assumption of a contract award date of December 2, 1996, and timely submission of additional information by the licensee. In case of delay, the NRC PO will be consulted for establishing new delivery dates.

Table 3-13. Deliverables for Task Order 08

Delivery Number	Deliverable Description	Completion Date
8265-008-710	Prepare Outline of Regulatory Concerns on Needed Revisions	TBD FY97
8265-008-715	Prepare Draft of Proposed Changes to Title I SRP	TBD FY97
8265-008-720	Prepare Draft of Proposed Changes to Title II SRP	TBD FY97
8265-008-720	Prepare Final Revised Title I SRP	TBD FY97
8265-008-730	Prepare Final Revised Title II SRP	TBD FY97

Figure 3-8 presents the schedule for this task order. In actual execution, it is expected that this schedule will need to be modified due to conflicting UR program demands. Modifications will be made in consultation with the NRC TM and PO.

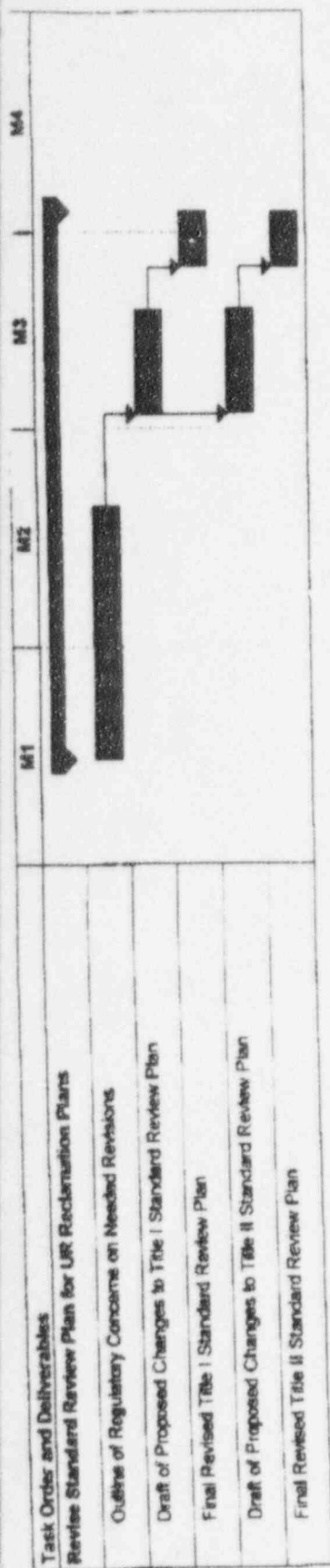


Figure 3-8. Schedule for Task Order 08

3.8.6 Travel

Table 3-14 presents the approved travel for this task order. Travel will be decided in consultation with the NRC TM.

Table 3-14. Travel requirements for Task Order 08

Fiscal Year	No. of Travelers	Trip Duration, Days	Purpose
1997	1	5	PM and PI meeting with NRC PM in Rockville to discuss review procedures and identified shortcomings of the current SRP and search NRC records for documents relevant to this review
1997	4	1	Site visit at Texas