JUN 4 1991

MEMORANDUM FOR: Ramon E. Hall, Director
Uranium Recovery Field Office

FROM: John J. Surmeier, Chief
Uranium Recovery Branch
Division of Low-Level Waste Management
and Decommissioning, NMSS

SUBJECT: STANDARD FORMAT FOR COMPLETION REVIEW REPORT (CRR)

Enclosed is a shell of a CRR based upon the recently completed "Final Completion Review Report for the Remedial Action at the Shiprock Uranium Mill Tailings Site at Shiprock, New Mexico," and a summary of this standardized format. This standard format should be used as guidance for preparation of the Lakeview and Tuba City CRRs (URFO in-house casework) and all future CRRs. Use of this format, with the boilerplate, should ensure a consistent, time-effective product for CRRs produced by both Uranium Recovery Field Office and Headquarters.

An IBM 5520 document entitled, "Shell Completion Review Report," has been developed to further reduce secretarial time as well as ensure consistency. This IBM document will be transmitted to URFO this week. A brief discussion on using the Shell Completion Review Report document is presented in Enclosure 3.

The Shiprock CRR, dated May 9, 1991, should be of assistance in providing a perspective in those areas not covered in the shell CRR. If you have any questions please call either Dan Gillen (492-0517) or Allan Mullins (492-0578) of my staff.

ORIGINAL SIGNED BY

John J. Surmeier, Chief
Uranium Recovery Branch
Division of Low-Level Waste Management
and Decommissioning, NMSS

Enclosures:
1. Standard Format for NRC's Completion Review Report
2. IBM 5520 Shell Completion Review Report
3. Procedures for Using IBM 5520 Shell

cc: R.L. Bangart, LLWD
A.W. Beach, Region IV

Distribution: Central File# NMSS r/f LLUR r/f AMullins
DGillen JSurmeier JAustin PLohaus JGreeves
RBangart

PDR YES ___ NO X Category: Proprietary ___ or CF Only X
ACNW YES ___ NO X J.S.

SUBJECT ABSTRACT: STANDARD FORMAT FOR COMPLETION REVIEW REPORT (CRR)

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DATE	:6/4/91	:6/4/91	:6/4/91

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STANDARD FORMAT FOR COMPLETION REVIEW REPORT

The Completion Review Report (CRR) is divided into an introduction, four sections, and three appendices. This format should be closely followed with only the changes noted.

Introduction- Change site name and references, otherwise, use as written.

Section 1.1- UMTRCA- Use as written.

Section 1.2- Concurrence Process for the Selection, etc.- Change site name and references, otherwise, use as written.

Section 1.3- Concurrence Process for the Performance, etc.- Use as written.

Section 1.4- The _____ Site- Use the general format but alter as appropriate for the specific site.

Section 1.5- CRR Organization- Change site names, otherwise, use as written.

Section 2.0- Analysis of DOE Remedial Action Performance- Follow the preferred format and alter for specific site characteristics and assessments.

Section 3.0- Summary- Change site name, and use as written if concurrence is given. Otherwise (open issues exist) present a summary of the issues needing resolution.

Section 4.0- References- References listed should be those used in the review process and those cited in the document.

Appendix A- NRC Site Visits- All site visits and inspections should be listed following the format in the example.

Appendix B- Detailed comparison- This is very site specific. All of the RAP features shown may not be applicable for every site and some RAP features may not be identified which would be needed in addition to those shown. The categories shown under each RAP feature should be addressed as needed and appropriate for the site being discussed. Additional site-specific categories may be added as needed to complete the detailed comparison and verification of the remedial activities.

Appendix C- UMTRCA, the EPA standards and the Phased UMTRA Project- Use as written.

The intent of this standard format is to reduce the amount of time and effort spent in producing a CRR and to make them relatively consistent.

FINAL COMPLETION REVIEW REPORT

FOR THE

REMEDIAL ACTION

AT THE

[**NAME OF SITE**] URANIUM MILL TAILINGS SITE

[**LOCATION OF SITE**]

[**Date of Issue**]

Division of Low-Level Waste Management
and Decommissioning
U.S. Nuclear Regulatory Commission

ENCLOSURE 2

TABLE OF CONTENTS

[**NAME OF SITE**] Completion Review Report

[**CAP NAME OF SITE**] COMPLETION REVIEW REPORT

INTRODUCTION

The [**NAME OF SITE**] site is one of the 24 abandoned uranium mill tailings sites to be remediated by the Department of Energy (DOE) under the Uranium Mill Tailings Radiation Control Act of 1978 (UMTRCA). UMTRCA requires, pursuant to Section 104(f)(1), that the Nuclear Regulatory Commission (NRC) concur with the DOE's determination that the remedial action has been properly completed. This Completion Review Report (CRR) documents the NRC staff's basis for its concurrence decision with respect to DOE's Certification Report for the completion of the [**NAME OF SITE**] site [**(CITE OF DOE COMPLETION REPORTS)**].

1.0 BACKGROUND

1.1 UMTRCA

Title I of UMTRCA provides for remedial action at abandoned uranium mill tailings sites and associated vicinity properties. The purpose of this legislation is to protect the public health and safety and the environment from radiological and non-radiological hazards associated with the radioactive materials at these sites.

UMTRCA directs DOE to select and perform remedial actions at 24 abandoned uranium mill tailings sites to ensure compliance with the general environmental standards promulgated by the Environmental Protection Agency (EPA) under Section 275(a) of the Atomic Energy Act of 1954, as amended by UMTRCA. UMTRCA also requires DOE to obtain NRC's concurrence with DOE's selection and performance of the remedial actions. Following completion of the remedial actions, UMTRCA authorizes NRC to license the long-term custody, maintenance, and monitoring of the disposal sites to ensure continued protection of the public health and safety and the environment. Appendix C includes a more detailed discussion of this legislation.

1.2 Concurrence Process for the Selection of DOE's Remedial Actions

To document its selection of the remedial action to be implemented at a particular site, DOE develops and issues a Remedial Action Plan (RAP). The RAP describes the series of activities and presents the design proposed by DOE to stabilize the residual radioactive materials at the disposal site and to provide for the long-term protection of the public and the environment. In accordance with UMTRCA Section 108(a)(1), the NRC staff reviews and concurs with the RAP, and any subsequent modifications. By its review and concurrence in the remedial action selection, the NRC staff concludes that the planned remedial actions will comply with EPA's applicable standards in 40 CFR 192, Subparts A, B, and C. The basis for the NRC staff's concurrence in DOE's selection of remedial action at the [**NAME OF SITE**] site is documented in a Technical Evaluation Report (TER) issued in [**DATE OF TER AND CITATION**].

1.3 Concurrence Process for the Performance of DOE's Remedial Actions

The remedial action work is performed by DOE contractors under Federal procurement regulations. During construction, DOE inspects and documents activities in accordance with the UMTRA Project Quality Assurance Plan, the Remedial Action Inspection Plan (RAIP), and the RAP. In addition, the NRC staff conducts independent inspections during construction.

Upon the completion of the remedial action, DOE compiles construction records and prepares a completion report to document that remedial actions were performed in accordance with the RAP or RAP modifications, and the RAIP. Based on this information, DOE certifies that all provisions of the RAP have been satisfied and, therefore, that the remedial actions comply with the applicable EPA standards in 40 CFR 192. Based on its review of DOE's documentation, and on its site visits and observations, NRC makes a concurrence decision with regard to DOE's remedial action completion determination for the sites, and then documents the basis for this concurrence decision in the CRR. By its review and concurrence in the remedial action performance, the NRC staff concludes that the remedial action has been completed in accordance with the concurred-in design. NRC's concurrence with DOE's completion determination fulfills the Commission's responsibility under UMTRCA Section 104(f)(1) to concur with DOE's determination of completion of remedial action.

1.4 [**CAP NAME OF SITE**] [** SITE

The [**NAME OF SITE**] uranium mill tailings site is located ... The site consists of about ___ acres, __ of which were covered by the ___ million tons of uranium mill tailings prior to remedial action. The site ...

The remedial action performed by DOE consisted of the following major activities:

1. xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx xxxx;

2. xxxxxxxxxxxx; and

x. ...

The NRC was not involved with the actual remedial action activities, which were performed by the DOE contractors. However, DOE obtained NRC concurrence with the site construction design and significant modifications thereof. NRC also

performed site inspections to monitor the progress of the construction activity (see Appendix A).

1.5 Completion Review Report (CRR) Organization

The purpose of this CRR is to document the NRC staff review of DOE's [**NAME OF SITE**] Certication Report. Section 2 of this report presents the analysis of remedial action construction. This section is organized by technical discipline and addresses geotechnical engineering, surface water hydrology, and radiation protection aspects of the remedial action. Appendix A provides a listing of all NRC staff visits to and inspections of the [**NAME OF SITE**] site. Appendix B provides a table that cross-checks the requirements of the RAP/RAIP as concurred in by the NRC staff with DOE's Certification Report documentation. Appendix C presents a detailed description of the requirements of UMTRCA and the resulting phased process of the UMTRA Project.

2.0 ANALYSIS OF DOE REMEDIAL ACTION PERFORMANCE

2.1 Previous Actions

The NRC staff, based on its review of the RAP and RAP modifications, concurred that the remedial action as designed would meet the applicable EPA standards. This concurrence was based on technical findings that there is reasonable assurance that the selection of the remedial action would meet the standards for long-term stability, radon attenuation, water resources protection and cleanup of contaminated land and buildings. Staff reviews included assessments in the areas of health physics and radiation protection, geotechnical engineering, surface water hydrology, ground-water hydrology, and geology. The NRC gave [** CONDITIONAL **] concurrence with the RAP on [** DATE **, CITATION **]. ... [** CONDITIONS **] [** RAP mods **] ... NRC staff also reviewed and concurred with DOE's Remedial Action Inspection Plan (Rev **) on [** DATE **]. This concurrence was the NRC staff's agreement that the quality control program, i.e., the plan for testing and inspections, was acceptable for the [** NAME OF SITE**] site.

2.2 Review of Remedial Action Performance

The NRC staff's primary objective in reviewing DOE's certification of remedial action completion is to de' rmine whether the remedial actions have been performed in a manner consistent with specifications provided in the RAP, RAP modifications, and the RAIP, and if not, that deviations to these specifications do not significantly affect compliance with the EPA standard. In support of this action, the NRC staff participated in site inspections (See Appendix A), field observations, assessments of onsite data and records, and review of DOE Site Audit Reports. The following sections present the results of the review of remedial action performance by individual technical discipline. Note that for the [**NAME OF SITE**] remedial action completion review, the pertinent technical disciplines are 1) ....., and x) .... [** IF APPLICABLE -- Groundwater resources protection is not addressed at this time, since DOE has elected to postpone any groundwater remedial action activities to a separate phase of the project. **]

2.2.1 Geotechnical Engineering Review Results

During its review, the NRC staff noted the following:

1. xxxx xxxx xxxx.

2. xxxx xxxx xxxx.

X. xxxx xxxx.

Details of the staff's geotechnical engineering review, which provide the basis for the above conclusions, are included in the attached Appendix B. Based on the above conclusions, and on the results of on-site inspections performed by NRC staff during construction, the NRC staff concludes that the geotechnical engineering aspects of the construction were performed in accordance with the design and specifications identified in the RAP, RAP modifications, and RAIP.

2.2.2 Surface Water Hydrology and Erosion Protection Review Results

NRC staff reviewed the surface water hydrology and erosion protection aspects of remedial actions at [**NAME OF SITE**] to ensure that they were constructed in accordance with the applicable construction specifications as stipulated in the RAP/design, RAP modifications, and RAIP. Areas of review included as-built drawings, construction operations, laboratory and field testing, and quality assurance audits. In addition, the review was based on NRC observations of the remedial actions and reviews of records and testing during NRC onsite inspections (See Appendix A).

.... During its review, the NRC staff noted the following:

...

Based on NRC staff observations and review of onsite records during the remedial actions, as well as assessment of the verification results presented in the DOE Completion Report, the NRC staff concludes that the required durability and gradation tests were performed during the remedial action. The riprap is of adequate quality and has been acceptably placed. The NRC staff concurs that remedial action has been adequately completed at [**NAME OF SITE**] with respect to erosion protection.

2.2.3 Radiation Protection Review Results

The NRC staff reviewed radiation protection aspects of remedial actions at [**NAME OF SITE**] to ensure that cleanup of residual radioactive materials was performed in accordance with specifications in the RAP and RAP modifications, RAIP, and the final design. Areas of review included contaminated material excavation, verification of cleanup, laboratory and field testing, and quality assurance audits. Specific discussion of the details of this review can be found in Appendix B. The review was based on NRC staff assessment of the verification results presented in the DOE Completion Report. In addition, NRC geotechnical engineering staff reviewed the design and construction of the disposal cell cover to ensure compliance with the RAP design for limiting radon releases, and thus with the EPA standards (See Section 2.2.1).

The criteria for site cleanup were established in the RAP and concurred in by the NRC staff [**CITATION**]. The general criterion was to clean up windblown and waterborne contamination on adjacent lands to levels complying with the applicable EPA standards (40 CFR Part 192.12). ...

During its review of the radiation protection aspects of the remedial action completion documentation, the NRC staff noted that the techniques, which DOE states to have used for verifying radiological cleanup at the processing site, complied with DOE's summary protocols and the Vicinity Property Management and Implementation Manual (VPMIM) procedures, with which NRC concurred in June 1987. In addition, DOE's radiological survey records support compliance with EPA's cleanup standards in Subpart B of 40 CFR Part 192.

3.0 SUMMARY

The NRC staff reviewed geotechnical engineering, surface water hydrology, and radiation protection aspects of the remedial action performed at the uranium mill tailings site in [**NAME OF SITE**]. The purpose of this review was to determine whether DOE had performed remedial actions at the site in accordance with specifications in the RAP, RAP modifications, and other supporting project documents, and thus with the EPA standards in 40 CFR Part 192, Subparts A-C. Based on its review of the Certification Report and on observations during periodic site inspections, the NRC staff concurs that DOE has performed remedial action at the [**NAME OF SITE**] site in accordance with the above specifications and that this action complies with EPA's standards in 40 CFR Part 192, Subparts A-C. With the exception of ...., remedial actions are complete for the [**NAME OF SITE**] site. [** IF APPLICABLE -- DOE has proposed deferral of selection and performance of a groundwater cleanup program at this time, and plans to handle this as part of a separate UMTRA groundwater restoration program. **] The NRC staff considers DOE's deferral to be acceptable, and therefore, hereby concurs in completion of the [**NAME OF SITE**] remedial action [**IF APPLICABLE -- (other than groundwater restoration). **]

4.0 REFERENCES

[**EXAMPLE OF FORMAT**]

DOE (U.S. Department of Energy), 1985a, "Remedial Action Plan and Site Conceptual Design for Stabilization of the Inactive Uranium Mill Tailings Site at Shiprock, New Mexico," June 1985.

DOE, 1985b, "RAP Modification No. 1, Remedial Action Plan and Site Conceptual Design for Stabilization of the Inactive Uranium Mill Tailings Site at Shiprock, New Mexico," October 1985.

DOE, 1986a, "RAP Modification No. 2, Remedial Action Plan and Site Conceptual Design for Stabilization of the Inactive Uranium Mill Tailings Site at Shiprock, New Mexico," February 1986.

DOE, 1988, Arthur, J.W. letter to Lohaus, P.H., U.S. Nuclear Regulatory Commission, transmitting "Evaluation of As-Constructed Riprap for Shiprock, New Mexico Site," December 5, 1988.

MK-Ferguson, 1986, "UMTRA Project - Shiprock, New Mexico, Remedial Action Inspection Plan," August 8, 1986.

NRC (U.S. Nuclear Regulatory Commission), 1985, Higginbotham, L.B. letter to Themelis, J.G., U.S. Department of Energy, providing conditional concurrence on the RAP, June 6, 1985.

APPENDIX A:

NRC SITE VISITS TO THE

[**CAP NAME OF SITE**] UMTRA PROJECT SITE

Appendix A

NRC Site Visits to the
[**NAME OF SITE**] UMTRA Project Site

[**EXAMPLE OF FORMAT**]

DATE	STAFF/DISCIPLINE	PURPOSE
6/26/84	D. Gillen/geotechnical eng T. Johnson/surf hydrology-erosion R. Pennifill/proj management	Pre-construction disposal site and borrow site visit
10/16/84	F. Ross/groundwater hydrology M. Weber/groundwater hydrology M. Knapp/management	Site visit to resolve gw characterization issues
5/9/85	J. Valdes/geology K. Westbrook/geology M. Larson/groundwater hydrology D. Gillen/geotechnical eng-pm T. Johnson/surf hydrology-erosion B. Jagannath/geotechnical eng S. Smykowski/geotechnical eng M. Haisfield/proj management P. Justus/management	Part of a multiple site tour; observation of initial construction activities

APPENDIX B:

DETAILED COMPARISON OF DESIGN SPECIFICATIONS WITH COMPLETED REMEDIAL ACTIONS PERFORMED AT [**CAP NAME OF SITE**] UMTRA PROJECT SITE

[**EXAMPLE OF FORMAT**]

APPENDIX B

VERFICATION OF REMEDIAL ACTION PLAN ACTIVITIES

Site: [**Name of Site**] Reviewer(s): [**Name(s)**]
RAP Feature: [**Name of Feature (p.x of N**]

RAP Requirement	Determination
a. Configuration	
(1) Floor of pit will be leveled and proof rolled and all tailings material or soft spots removed (RAIP 6.2.1). Foundation elevation will be 5020' (RAP Vol.II, Design Drawing SPK-PS-10-0107).	The bottom of the pit was visually verified to be free of uranium mill tailings - (Comp. Rept. Vol. 1, III.D, Soil Measurement Methods Sect., p.1).
b. Material	
(1) Gradation-particle size not greater than lift thickness (RAP Vol.II, 02200U-2.1 E.3).	Verified during gradation tests (Comp. Rept. Vol.3, App.E, Foundation Fill Sect., p.2).
c. Placement	
(1) Lift thickness-not to exceed 12" (RAP Vol.II, 02200U-2.1 E.3).	Continuous monitoring was performed to ensure that lift thickness did not exceed 12" (Comp. Rept. Vol.3, App.E, Foundation Fill Sect., p.2).
(2) Compaction-floor of pit will be proof rolled-minimum of 90% of maximum as per ASTM D698 (RAP Vol.I, p.55).	Average compaction achieved was 95% (Comp. Rept. Vol.3, App.E, Foundation Fill Sect., p.1).
(3) Organic distribution-no visible organic matter within tailings embankment footprint (RAP Vol.II, 02200U-2.1 E.2).	NOT ADDRESSED IN DOE's COMPLETION REPORT. See Section 2.2.1 of CRR.

VERFICATION OF REMEDIAL ACTION PLAN ACTIVITIES

Site: [**Name of Site**] Reviewer(s): [**Name(s)**]
RAP Feature: [**Name of Feature (p.x of N**]

RAP Requirement	Determination
d. xxxxxxxxxxxxx	
(1) xxxxx xx xxxx xx xxxxxxxxxxx xxx xxxxx xxxxxx xxxx xx	xxx xxxxoxxxxxxhxxxixxxxx xxxxxxxxxxxxxxxxxxxxx xxxx

APPENDIX C:

UMTRCA, THE EPA STANDARDS, AND THE PHASED UMTRA PROJECT

APPENDIX C

UMTRCA, THE EPA STANDARDS, AND THE PHASED UMTRA PROJECT

Title I of UMTRCA defines the statutory authority and roles of the DOE, the NRC, and the EPA with regard to the remedial action program for inactive uranium mill tailings sites.

The Standards

UMTRCA charged the EPA with the responsibility for promulgating remedial action standards for inactive uranium mill sites. The purpose of these standards is to protect the public health and safety and the environment from radiological and non-radiological hazards associated with radioactive materials at the sites. UMTRCA required that EPA promulgate these standards by no later than October 1, 1982. After October 1, 1982, if the EPA had not promulgated standards in final form, DOE was to comply with the standards proposed by EPA under Title I of UMTRCA until such time as the EPA had promulgated its standards in final form.

The final EPA standards were promulgated with an effective date of March 7, 1983 (48 FR 602; January 5, 1983); See 40 CFR Part 192 - Standards for Remedial Actions at Inactive Uranium Processing Sites, Subparts A, B, and C. These regulations may be summarized as follows:

1. The disposal site shall be designed to control the tailings and other residual radioactive materials for up to 1000 years, to the extent reasonably achievable, and, in any case, for at least 200 years [40 CFR 192.02(a)].

2. Provide reasonable assurance that the disposal site design shall prevent radon-222 from residual radioactive material to the atmosphere from exceeding 20 picocuries per square meter per second or from increasing the annual average concentration of radion-222 in air at or above any location outside the disposal site by more than one-half picocurie per liter [40 CFR 192.02(b)].

3. The remedial action shall be conducted so as to provide reasonable assurance that, as a result of residual radioactive materials from any designated processing site, the concentrations of radium-226 in land averaged over any area of 100 square meters shall not exceed the background level by more than 5 picocuries/gram averaged over the first 15 centimeters of soil below the surface and 15 picocuries/gram averaged over any 15 centimeters more than 15 centimeters below the surface [40 CFR 192.12(a)].

The portion of the EPA standards dealing with ground water requirements, 40 CFR 192.20(a)(2)-(3) were remanded by the Tenth Circuit Court of Appeals on September 3, 1985. Based on this court decision, EPA was directed to promulgate new groundwater standards. EPA proposed these standards in the form of revisions to Subparts A-C of 40 CFR Part 192 in September, 1987, and now is in the process of completing action to promulgate the final groundwater standards.

As mandated by Section 108(a)(3) of UMTRCA, however, the remedial action at the inactive uranium processing sites, is to comply with EPA's proposed standards until such time as the final standards are promulgated. DOE continues to perform remedial action at the inactive processing sites in accordance with NRC's concurrence with the remedial action approach based on the proposed EPA groundwater standards (52 FR 36000; September 24, 1987). Delaying implementation of the remedial action program would be inconsistent with Congress' intent of timely completion of the program. Modifications of disposal sites after completion of the remedial action to comply with EPA's final ground water protection standards may be unnecessarily complicated and expensive and may not yield commensurate benefits in terms of human and environmental protection. Therefore, the Commission believes that sites where remedial action has been essentially completed prior to EPA's promulgation of final ground water standards will not be impacted by the final ground water standards. Although additional effort may be appropriate to assess and clean up contaminated ground water at these sites, the existing designs of the disposal sites should be considered sufficient to provide long-term protection against future ground water contamination. NRC does not view UMTRCA as requiring the reopening of those sites that have been substantially completed when NRC concurred with the selection of remedial action in accordance with applicable EPA standards, proposed or otherwise in place at the time such NRC concurrence was given.

DOE Selection (Design) Phase

For each site, UMTRCA requires that DOE select a plan of remedial action that will satisfy the EPA standards and other applicable laws and regulations, and with which the NRC will concur. For each site, this phase includes preparation by DOE of an Environmental Assessment or an Environmental Impact Statement, and a Remedial Action Plan (RAP). The Remedial Action Plan is structured to provide a comprehensive understanding of the remedial actions proposed at that site and contains specific design and construction requirements. To complete the first phase, NRC and the appropriate State or Indian tribe review the RAP and then concur that the RAP will meet the EPA standards.

The Performance (Construction) Phase

In this phase the actual remedial action (which includes decontamination, decommissioning, and reclamation) at the site is done in accordance with the Remedial Action Plan. The NRC and the State/Indian tribe, as applicable, must concur in any changes to the concurred-in plan that arise during construction. At the completion of remedial action activities at the site, NRC concurs in DOE's determination that the activities at the site have been completed in accordance with the approved plan. Prior to licensing (the next phase), title to the disposed tailings and contaminated materials must be transferred to the United States and the land upon which they are disposed of must be in Federal custody to provide for long-term Federal control. Disposal sites on Indian land will remain in the beneficial ownership of the Indian tribe.

NRC concurrence in the DOE determination that remedial action at a processing site has been accomplished in accordance with the approved plan may be accomplished in two steps where residual radioactive material is not being moved from the processing site to a different disposal site. The Uranium Mill Tailings Remedial Action Amendments Act of 1988 allows for a two step approach for Title I disposal sites. The Amendments Act will allow DOE to do all

remedial actions, other than ground water restoration, for the first step of closure and licensing. The second step, which can go on for many years, will deal with existing ground water restoration. When ground water restoration is completed, the Long-Term Surveillance Plan required under the licensing phase will be appropriately amended. For sites that are being moved, licensing will occur in one step. There is no ground water restoration at the disposal site and the processing site will not be licensed after completion of remedial action.

The Licensing Phase

Title I of UMTRCA further requires that, upon completion of the remedial action program by DOE, the permanent disposal sites be cared for by the DOE or other Federal agency designated by the President, under a license issued by the Commission. DOE will receive a general license under 10 CFR Part 40.27 following (1) NRC concurrence in the DOE determination that the disposal site has been properly reclaimed and (2) the formal receipt by NRC of an acceptable Long-Term Surveillance Plan (LTSP). NRC concurrence with DOE's performance of the remedial action indicates that DOE has demonstrated that the remedial action complies with the provisions of the EPA standards in 40 CFR part 192, Subparts A, B, and C. This NRC concurrence may be completed in two steps as discussed above. There is no termination date for the general license.

Public involvement has been and will continue to be provided through DOE's overall remedial action program for Title I sites. The local public will have an opportunity to comment on the remedial action or closure plans proposed and implemented by DOE and to raise concerns regarding final stabilization and the degree of protection achieved. NRC fully endorses State/Indian tribe and public input in all stages of the program, especially in the planning stages of remedial action when such input can be most effective in identifying and resolving issues affecting long-term care. At the time the LTSP is submitted, the NRC will consider the need for a public meeting in response to requests and public concerns. Therefore, NRC encourages State/Indian tribe and public participation early in the remedial action and closure process and will provide additional opportunities, as needed, later in the process.

The Surveillance and Monitoring Phase

In this phase DOE and NRC periodically inspect the disposal site to ensure its integrity. The Long-Term Surveillance Plan (LTSP) will require the DOE to make repairs, if needed.

One of the requirements in the EPA standards is that control of the tailings should be designed to be effective for up to 1000 years without active maintenance. Although the design of the stabilized pile is such that reliance on active maintenance should be minimized or eliminated, the NRC license will require emergency repairs as necessary. In the event that significant repairs are necessary, a determination will be made on a site specific basis regarding the need for additional National Environmental Policy Act (NEPA) actions, and health and safety considerations from 10 CFR Parts 19, 20, and 21.

IBM 5520 PROCEDURES FOR USING
THE SHELL COMPLETION REVIEW REPORT (CRR)

The IBM 5520 document entitled, "Shell Completion Review Report," is available for use in preparing CRR's. It is a "read only" document that can be duplicated (i.e, request "DUP") for creating the site specific CRR.

All site specific names, references, etc. have been identified with a designator "[**" followed by another designator "**]". The IBM "Global/Search/Replace" menu can be used to change such generic designators as [**NAME OF SITE**] or [**CAP NAME OF SITE**] to the specific site name and location throughout the document. The IBM "FIND" function (press CODE + X) can be used to locate all occurrences of "[**" where words or phrases will need to be changed.

The body of the CRR and each Appendix has been designated with "page format changes" (i.e., request "PFC") in the IBM 5520 system. This will permit the secretary to insert new material into the duplicated 5520 document and still be able to keep page numbers in sequential order. Figures or other inserts may be added (or deleted) for page numbering purposes by inserting (or deleting) blank pages as illustrated on page 3 of the shell CRR. The use of "required page endings" (i.e., request ALT + 3) for such blank pages will assist in the pagination of the document.

It is suggested that the secretary use the "IPN" request (i.e., interactive pagination) prior to printing the completed document in order to ensure that the pages are properly formatted.

ENCLOSURE 3