

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

April 22, 2021

MEMORANDUM TO:	Christepher A. McKenney, Chief Risk and Technical Analysis Branch Division of Decommissioning, Uranium Recovery, and Waste Programs
	Office of Nuclear Material Safety and Safeguards
FROM:	Cynthia S. Barr, Senior Risk Analyst Risk and Technical Analysis Branch Division of Decommissioning, Uranium Recovery, and Waste Programs Office of Nuclear Material Safety and Safeguards
SUBJECT:	SUMMARY OF MARCH 15, 2021, WEBINAR TO OBTAIN COMMENTS ON NUREG-1757, VOLUME 2, REVISION 2

On March 15, 2021, the U.S. Nuclear Regulatory Commission (NRC) held a public meeting via WebEx to obtain comments on NUREG-1757, Volume 2, Revision 2, "Consolidated Decommissioning Guidance, Characterization, Survey, and Determination of Radiological Criteria." The meeting was noticed in the *Federal Register (FR)* (86 FR 6683) and on the NRC's public website on January 19, 2021. The notice and meeting agenda are available in the NRC's Agencywide Documents Access and Management System (ADAMS) at Accession No. ML21066A000. The NRC staff's presentation is available in ADAMS at Accession No. ML21057A335. During the public meeting, NRC staff provided a summary of the changes that were made to the guidance document, as well as information on how to submit comments on the draft document and plans to finalize the document.

Over 100 stakeholders participated in the public meeting. The Nuclear Energy Institute (NEI) registered to provide formal comments in advance of the meeting. A representative from the State of New Jersey also provided comments. NEI and State of New Jersey recognized the significant effort in updating the document and its usefulness to licensees and reviewers. NEI would be providing a significant number of written comments and indicated its desire to continue dialogue after the public meeting to discuss the comments in more detail. NEI indicated that it would be providing comments or suggest improvements in the following areas: (i) flow and organization of the document, (ii) incorporation by reference of secondary guidance documents (versus summarizing guidance documents which may change over time), (iii) the need for clarity regarding the level of detail expected in decommissioning documents such as final status surveys, and (iv) the need for guidance on hot particles. The State of New Jersey commented

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that the guidance document is used quite extensively and noted that NRC should be aware that the States also use it in areas that the NRC does not regulate and that changes could have an impact on those programs (e.g., Technologically Enhanced Naturally Occurring Radioactive Material).

Members of the public also asked clarifying questions or indicated their intent to provide follow-up comments related to the following areas:

- A question was raised regarding the timeline for incorporation of updates from Multi-Agency Radiological Survey and Site Investigation Manual (MARSSIM), Multi-Agency Radiation Survey and Assessment of Materials, and Equipment and Multi-Agency Radiological Laboratory Analytical Protocols Manual.
- Questions were raised about guidance on subsurface surveys and several stakeholders expressed interest in participating in the workshop NRC plans to have this summer on the topic.
- A question was raised about the applicability of Scenario B for uranium mill tailings.
- A question was raised about the primary lessons learned that were incorporated into the guidance document.
- A question was raised about updates to NUREG-1757, Volumes 1 and 3.
- A general question was raised about the content of the technical guidance document.

NRC responded that it had representation on the MARSSIM working group and worked closely with the working group on updates although some updates to NUREG-1757, Volume 2, Revision 2, might be necessary following finalization of MARSSIM Revision 2 document namely reference to Revision 2 of the document. NRC reiterated its plans to continue interacting with interested stakeholders following the meeting most notably the workshop on subsurface radiological surveys and dose modeling planned for this summer. NUREG-1757, Volume 1 is planned for publication this year, while no plans are currently underway to update Volume 3. NRC listed the key changes to the document primarily found on survey of excavations and associated with soil reuse in Appendix G, consideration of elevated areas in Appendix I, exposure scenarios for large basement substructures in Appendix J, and a new appendix O on composite sampling. The full transcript of the meeting is available at Accession No. ML21102A273.

Enclosure: List of Attendees C. McKenney, NMSS/DUWP/RTAB

Summary of March 15, 2021, Webinar to Obtain Comments on NUREG-1757, Volume 2, Revision 2 DATE April 22, 2021

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ADAMS Accession No.: ML21102A144; Memo ML21102A142

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