



NRC Inspection Program

July 1, 2009
NMA/NRC workshop
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Discussion Topics

- How the NRC conducts UR inspections
- Decommissioning & Timeliness requirements
- NRC position on using non-approved standards for dose calculations
- Hint on saving YOU \$\$
- Questions?



How NRC Conducts Inspections

Preparation by Inspector

- Generate inspection plan (non-public, identifies scope of inspection)
- Generate inspection report number (billing)
- Review docket file records
- Review event reports (excursions, spills)
- Locate inspection references
- Pack sampling equipment (survey meter)



How NRC Conducts Inspections, Cont.

Site Inspections -confirm license conditions and regulations are met

- Entrance Meeting (inspection scope)
- Interviews
- Site tours
- Review Records
- Take samples/perform confirmatory measurements
- Exit Briefing (preliminary findings)



How NRC Conducts Inspections, Cont.

After Inspection

- Travel back to office
- Discuss findings with RIV management & HQ Project Manager
- Write inspection report (within 30 days of exit briefing, publicly available)
- If a Notice of Violation is issued-may coordinate with Office of Enforcement
- Branch Chief reviews report and signs

Issue Identified During Inspections

“roving radiation areas”

- Tanks in CPP
- Filters in header houses
- ROs in satellites
- Waste storage bins

Require Radiation Area postings and restricted access



Decommissioning & Timeliness

- Due to new uranium recovery licenses, NRC reviewing regs & guidance
- NRC legal staff determined that “timeliness rule” under 10 CFR 40.42 applies to ISR wellfields
- Timeliness rule ensures timely decommissioning of facilities upon termination of operations



Decommissioning & Timeliness, cont.

How 10 CFR 40.42 applies to ISR wellfields

Within 60 days of deciding to permanently cease injection of lixiviant in a wellfield, a licensee must initiate decommissioning as approved in your NRC restoration plan

groundwater (GW) restoration = wellfield
decommissioning



Decommissioning & Timeliness, cont.

- Time clock begins at cessation of lixiviant injections and the shift from principal activity of uranium production to initiation of GW restoration
- It is understood that residual uranium in the GW may still be recovered following the cessation of lixiviant injection- it is the NRC's position that recovery of uranium then becomes incidental to GW restoration



Decommissioning & Timeliness, cont.

10 CFR 40.42(h)(1)

A licensee has 24 months to complete
GW restoration, once begun,

OR

The licensee must notify the NRC and
request an alternate schedule for
completion of GW restoration



Decommissioning & Timeliness, cont.

10 CFR 40.42(i) – Requesting an Alternate Schedule

NRC may approve a request for an alternate schedule if:

The licensee shows adequate justification (such as it is not technically feasible to complete within 24 months)

AND

An adequate alternative schedule is requested

AND

The health & safety of the workers and the public will be protected and is in the public interest



Decommissioning & Timeliness, cont.

10 CFR 40.42(f) – Request to delay process

A licensee may request to delay or postpone initiation of the decommissioning process if it is not detrimental to public health & safety and in the public interest

The request must be submitted 90 days prior to licensee's decision to cease operations at a wellfield



Decommissioning & Timeliness, cont.

- Requests for alternate decommissioning schedules and delaying decommissioning actions are licensing processes
- Send requests to your HQ project manager



Decommissioning & Timeliness, cont.

Why is this important to you?

In the past, NRC was not enforcing
10 CFR 40.42 at ISR facilities

BUT....

Beginning summer 2009, NRC will begin
to inspect against this requirement



Decommissioning & Timeliness, cont.

NRC inspectors will look at current wellfields in restoration and ensure they are on schedule for restoration within 24 months

OR

Ensure the licensee has an NRC approved alternate schedule



Decommissioning & Timeliness, cont.

If you have are not currently in compliance with restoration of wellfields within 24 months, and do not have an NRC approved alternate schedule for decommissioning....Contact your HQ project manager and discuss



Using Non-NRC Approved Dose Models

Part 20 dose requirements are based on ICRP Publications 26 & 30

Due to the way Part 20 was written- a licensee MAY NOT use a newer version of ICRP guidance or other non-NRC approved models for calculating dose- even if some guidance is more conservative



Using Non-NRC Approved Dose Models, cont.

If a licensee wants to use a newer model to determine doses to workers- (such as using ICRP 68 dose coefficients) they can request an exemption from the regulations to use different guidance

This is part of the licensing process- please discuss with you HQ project manager



Hint to Save You \$\$

If you send a hard copy of a report (such as annual environmental monitoring report) to NRC HQ, and you are required to submit a **COPY** to the RIV office

That **COPY** can be in electronic form (disk, thumb drive)

No duplicate hard copies are needed!!



Any Questions??