March 29, 2005

MEMORANDUM TO: IDIP NRC DISTRIBUTION LIST

FROM: Daniel M. Gillen, Deputy Director **/RA/**
Decommissioning Directorate
Division of Waste Management
and Environmental Protection
Office of Nuclear Material Safety
and Safeguards

SUBJECT: TRANSMITTAL OF INTEGRATED DECOMMISSIONING IMPROVEMENT PLAN (IDIP), REVISION 1

Attached is the Integrated Decommissioning Improvement Plan (IDIP) Revision 1 for your use and information as appropriate. I am providing the IDIP to staff with assignments contributing to this activity, and to other interested parties so they are aware of the ongoing and planned improvements for the Decommissioning Program. If you have questions regarding the IDIP please contact Robert L. Johnson (301-415-7282 or, rlj2@nrc.gov).

Attachment: IDIP Revision 1

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INTEGRATED DECOMMISSIONING IMPROVEMENT PLAN
FY 2004-2007

Revision 1

March 29, 2005

Decommissioning Directorate
Division of Waste Management and Environmental Protection
U.S. Nuclear Regulatory Commission

TABLE OF CONTENTS

INTEGRATED DECOMMISSIONING IMPROVEMENT PLAN
FY 2004-2007

1.0 Introduction

1.1 Purpose

The purpose of the U.S. Nuclear Regulatory Commission's (NRC's) Integrated Decommissioning Improvement Plan (IDIP) is to:

describe a "continuous improvement" plan for decommissioning during FY 2004-2007 and

integrate and track regulatory improvements from the License Termination Rule (LTR) Analysis and program management improvements resulting from the Decommissioning Program Evaluation, Commission's direction resulting from the annual briefing in October 2004, and other staff improvements.

1.2 Content

Section 2.0 provides relevant background. Section 3.0 is a integrated summary of key improvements to make the program more effective resulting from: 1) Commission approved recommendations from the LTR Analysis; 2) recommendations from the Decommissioning Program Evaluation; and 3) Commission direction from the Staff Requirement Memorandum (SRM) from the annual program briefing to the Commission. A full set of improvements are integrated and listed by fiscal year, including improvements completed in FY 2004 and improvements planned for FY 2005-2007. Section 4.0 provides a description of the LTR Analysis improvements planned for FY 2005-2007, and Section 5.0 provides a description of the program management improvements planned for FY 2005-2007. Section 6.0 provides other improvements including the Commission's direction in the SRM on the annual briefing and other staff improvements. Finally, Section 7.0 provides project management information including a general schedule; products; and budget and resource information.

2.0 Background

2.1 LTR Analysis and Commission Direction

NRC staff experience with the LTR has revealed some important implementation issues impacting the decommissioning of sites. The Commission directed the staff, in June 2002, to conduct an analysis of LTR issues, with particular emphasis on resolving the restricted release and institutional control issues . The staff's analysis and recommendations for eight issues were provided to the Commission on May 2, 2003 (SECY-03-0069), and the Commission approved the staff's recommendations with comments on November 17, 2003. Subsequently, on March 1, 2004, the staff

provided the Commission with its analysis of a ninth issue on intentional mixing (SECY-04-0035), and the Commission approved the staff's recommendation, with comments on May 11, 2004. The Commission-approved recommendations and comments are the basis for the planned actions conducted during FY 2004 and planned during FY 2005-2007 as identified in this Plan. Attachment 1 provides the recommendations.

2.2 Decommissioning Program Evaluation Recommendations

NRC's Strategic Plan for FY 2000-2005 identified a program evaluation entitled *Changes to the Decommissioning Process* to be conducted in FY 2003. On September 29, 2003, the NRC staff completed its evaluation. In this report, the staff evaluated the effectiveness of NRC's Division of Waste Management (DWM) Decommissioning Program and recommended future improvements. The staff evaluated overall program effectiveness with: 1) NRC's Strategic Plan measures and targets; 2) the Office of Nuclear Material Safety and Safeguards (NMSS) Operating Plan accomplishments; and 3) the Office of Management and Budget (OMB) Program Assessment Rating Tool (PART). The staff used the PART questions as an independent methodology to systematically and comprehensively evaluate its program to identify areas of the program's effectiveness that might need further improvement. The staff also evaluated the effectiveness of 18 specific changes/improvements that were made to the program during the FY 2001–FY 2003 evaluation period.

The staff concluded in the Program Evaluation that the Decommissioning Program has been effective in meeting the Agency's strategic and performance measures and removing sites from the Site Decommissioning Management Plan (SDMP) list after completion of decommissioning and license termination. The program also effectively used many types of self-assessments and program changes to improve the regulatory framework, decommissioning processes, internal program management processes, and public involvement.

The Program Evaluation also noted that although significant improvements have been completed, future improvements would be beneficial. In particular, the recommendations in the LTR Analysis (SECY-03-0069) to resolve the LTR policy issues, when implemented as directed by the Commission, offer potentially significant future improvements for the program. To complement these regulatory and policy improvements, the Program Evaluation made additional recommendations that primarily would improve internal program management (see Attachment 1). The IDIP identifies the improvements completed in FY 2004 and planned for FY 2005-2006 to address the recommendations in the Program Evaluation.

2.3 Commission Direction Resulting from the Annual Decommissioning Briefing

The staff presented its annual briefing on the Decommissioning Program in October 2004. In addition to the staff, invited stakeholders representing industry and a State also presented their views on the Decommissioning Program. As a result of this

briefing, the Commission directed the staff to address the five items listed below (October 22, 2004, SRM-M041013A).

- Capture lessons learned and best practices and share

- Improve radiological monitoring

- Establish measures to provide finality in decommissioning

- Improve consistency among State and Federal regulators

- Enhance guidance to better address issues of flexibility and institutional controls for restricted release

The staff has incorporated these five items into the IDIP. The third item is being addressed under staff activities that implement the U.S. Environmental Protection Agency (EPA)-NRC Memorandum of Understanding (MOU).

3.0 Summary of Integrated Key Improvements

Improvement activities completed in FY 2004

Received Commission approval of staff recommendations for eight LTR issues in SECY-03-0069

Analyzed LTR issue for intentional mixing of soils; received Commission approval of recommendations (SECY-04-0035)

Published a Regulatory Issue Summary (RIS) to inform licensees and stakeholders of NRC's plans to resolve the LTR Analysis of nine issues (RIS 2004-08)

Completed interim guidance on Long-Term Control (LTC) license for Shieldalloy Metallurgical Corporation (SMC) site

Restructured into comprehensive decommissioning program

Reorganized DWM, hired critical disciplines in health physics

Established a risk-informed procedure to prioritize site resources

Began developing a communication strategy with new tools to exchange knowledge/lessons (U.S. Department of Energy (DOE) Interagency Agreement (IA), Annual Report, lessons web page)

Started staff training to implement Consolidated Guidance and LTR issues with training on Vols 1-3

Enhanced management review of decommissioning progress in Decommissioning Board meetings

Approved additional resources during the budget process for program improvements and additional dose assessment critical skills

Shared guidance on LTR Analysis issues with stakeholders (Waste Management (WM) 05 Symposia papers, National Mining Association annual meeting)

Prepared initial IDIP

Improvement activities planned in FY 2005

Prepare draft revised guidance for public comment on LTR Analysis issues: restricted use; onsite disposal; realistic scenarios; removal of material after license termination; intentional mixing of soil

Develop a risk-informed approach to revised inspection and enforcement procedures to reduce risk of decommissioning problems at operating sites

Begin proposed rulemaking/supporting guidance for changes in financial assurance and operations to prevent future legacy sites

Continue to implement new guidance by training staff on dose modeling, risk-informed approaches, LTR Analysis issues (as draft guidance is developed).

Further enhance dose modeling staff skills with budget increase and DOE reimbursable work

Continue consultations with licensees on new guidance and LTR issues

Develop resource expenditure tracking procedures

Revise performance measures for new Strategic Plan

Complete independent review of program by Inspector General (IG)

Complete independent review of key issues and guidance by the Advisory Committee on Nuclear Waste (ACNW)

Continue to implement communication strategy by holding stakeholder workshop to obtain early input on guidance, lessons learned, and suggestions for further program improvements as well as web page enhancements and decommissioning brochure

Evaluate incentives to facilitate decommissioning progress

Begin sharing guidance and lessons with DOE, Agreement States, and technical community (Stakeholder workshop, WM 05 Symposia, American Nuclear Society (ANS) 05 Conference)

Revise IDIP based on IG review, staff lessons learned, and stakeholder workshop

Coordinate/integrate with Regions and other offices and divisions

Finalize and implement prioritization procedure to manage resources

Document the status of improvements in Improvement Summary Report

Implement program management improvements by documenting procedures in revised Decommissioning Operations Manual

Improvements Planned in FY 2006

Publish final revised guidance on LTR issues: restricted use; onsite disposal; realistic scenarios; removal of material after license termination; intentional mixing

Publish proposed rulemaking/supporting guidance for changes in financial assurance and operations to prevent future legacy sites. This includes revised inspection and enforcement procedures to reduce risk of decommissioning problems at operating sites

Continue to implement new guidance by training staff on new guidance for LTR analysis issues

Implement new inspection and enforcement procedures by training staff

Continue to share guidance and lessons with DOE and Agreement States

Revise IDIP based on IG review and decommissioning lessons

Conduct OMB PART review, including reevaluation of program and effectiveness of improvements

Improvements Planned in FY 2007

Re-evaluate program and revise IDIP based on PART results and decommissioning lessons learned

Publish final rulemaking/supporting guidance for changes in financial assurance and operations to prevent future legacy sites

Continue to implement new rule/guidance by training staff on LTR Analysis issues, guidance, and rulemaking.

4.0 Description of LTR Analysis Improvements

4.1 Revise guidance for institutional controls; onsite disposal; removal of material after license termination; realistic scenarios; and intentional mixing

4.1.1 Description

New guidance or revised guidance will be developed for the issues listed below; this guidance will be included in the revision to the Consolidated Decommissioning Guidance in NUREG-1757. The guidance will be prepared for the following LTR Analysis issues listed below and should address the specific recommendations approved by the Commission (see Attachment 1 and SRM-SECY-03-0069)

- Restricted use/institutional controls
- On-site disposal
- Realistic Scenarios
- Removal of material after license termination (relationship of LTR and control of disposition of solid material)
- Intentional mixing of soil
- Other non-LTR Analysis topics (e.g., groundwater monitoring, engineered barriers)

The staff will use a process similar to the process used to develop NUREG-1757, including: management team reviews; ACNW reviews; Agreement State participation/review; and stakeholder input from a workshop. Draft guidance for public comment is planned for FY 2005 and final guidance planned for FY 2006. The Commission requested that it be informed of stakeholder comments on the restricted use/institutional control issue before guidance is finalized.

New internal guidance in the Manual Chapter for possession only specific license will also be developed to include a description of the new Long-Term Control possession only specific license.

4.1.2 Milestones, schedules, and assignments

Identify guidance development team assignments	12/04
Develop scope, schedule, and support assignments	02/05
Conduct stakeholder workshop to seek early input	04/05
Prepare internal draft guidance summary for ACNW review	05/05
Obtain ACNW comments in working group meeting	06/05
Prepare external draft guidance for public comment	09/05
Prepare Commission paper on public comments	FY06

Prepare internal final guidance for ACNW review	FY06
Prepare final guidance in revision to NUREG-1757	09/06
Train staff on final guidance	FY07

Assignments:

- Project Management (PM) (Schmidt/Banovac)

- Restricted use/institutional controls (Johnson/Banovac)
- On-site disposal (Youngblood)
- Realistic Scenarios (McKenney)
- Removal of material after license termination (Schmidt/Buckley)
- Intentional mixing of contaminated soil (Widmayer)
- Office of the General Counsel (OGC) legal review (Smith)

4.2 Revise inspection and enforcement guidance to enhance monitoring, reporting, and remediation to prevent future legacy sites

4.2.1 Description

New or revised inspection and enforcement guidance/procedures for operating licensees (not decommissioning licensees) will be prepared for the following LTR Analysis issues and should address the specific recommendations approved by the Commission (see Attachment 1 and SRM-SECY-03-0069).

Measures to prevent future legacy sites
- Changes to licensee operations
- Chronic releases
- Reporting deficiencies

This work will be conducted in two steps. The first step for FY 2005 will scope the inspection and enforcement guidance, including developing a risk-informed approach to identify operating sites with a high potential for subsurface contamination that could cause future decommissioning problems, identifying types of sites or specific sites and activities at these sites for heightened inspection, and identifying the types of inspection activities that would be completed at these sites. The second step will develop specific inspection and enforcement guidance for the types of sites and inspections identified in the first step. The second step will be developed along with the rulemaking and supporting guidance during FY 2006-2007 to ensure consistency between the rulemaking and guidance (see section 4.3 below). Coordination or participation with Regions and the Office of Enforcement (OE) will be necessary.

4.2.2 Milestones, schedules, and assignments

Identify guidance development team assignments	12/04

Prepare internal draft summary of scope for ACNW review	05/05
Obtain ACNW comments in working group meeting	06/05
Prepare scope of guidance (approach, operating sites/activities, inspection activities	09/05
Develop draft inspection and enforcement guidance	FY 2006
Develop final inspection and enforcement guidance	FY 2007

Assignments:

PM: Shepherd
Brown, McKenney, Peckenpaugh, Nalluswami

Office of Research (RES) rep: TBD
Region rep: TBD
Office of Nuclear Reactor Regulation (NRR) rep: TBD
OE rep: TBD
OGC legal review: Smith

4.3 Develop new rule and supporting guidance for preventing future legacy sites

4.3.1 Description

A new rulemaking and supporting new guidance/revised guidance will be developed The rule and guidance will be prepared for the following LTR Analysis issues listed below and should address the specific recommendations approved by the Commission (see Attachment 1 and SRM-SECY-03-0069):

- Measures to prevent future legacy sites
- Changes to financial assurance
- Initial underestimation of decommissioning cost
- Unavailability of funds in bankruptcy
- Inadequate financial disclosure
- Reaching assets after corporate reorganization
- Investment losses reduce trust account balance
- Accidental release increases decommissioning cost

- Changes to licensee operations

- Chronic releases
- Reporting Deficiencies

The staff will use the NMSS rulemaking process. The Commission directed the staff in SRM-COMSECY-04-0031 to proceed directly to the proposed rule stage, bypassing the development of a separate rulemaking plan because SECY-03-0069 contained the

necessary information. A proposed rule and draft supporting guidance for public comment is planned for FY 2006 and the final rule and guidance planned for FY 2007. The rulemaking work on the issue Changes to Licensee Operations links to the work on Revising the Inspection and Enforcement Guidance for this issue (see Section 4.2).

4.3.2 Milestones, schedules, and assignments

Identify guidance development team assignments	12/04
Conduct stakeholder workshop to seek early input	04/05
Prepare proposed rule/draft guidance for public comment	09/06
Prepare final rule/guidance	09/07

Assignments

PM: Kerr
Financial assurance changes: Fredrichs, contractor to be identified
Operational changes: Shepherd, Nalluswami, Peckenpaugh, Brown
RES/monitoring: TBD
OGC legal review: Smith

4.4 Other LTR Analysis recommendations approved by the Commission

4.4.1 Restricted Release–reevaluate potential for site transfers to DOE under the Nuclear Waste Policy Act (NWPA), Section 151(b) (Johnson)

4.4.2 Restricted Release–continue to monitor agency activities (DOE End States, DOE Legacy Management, EPA , Ohio) (Johnson)

4.4.3 Restricted Release–continue to implement options at specific decommissioning sites (SMC, AAR Manufacturing, West Valley) (Johnson)

4.4.4 Realistic scenarios–continue to implement option at specific decommissioning sites (SMC, AAR Manufacturing, West Valley, etc.) (McKenney)

4.4.5 Realistic Scenarios--Continue dose modeling improvements (Thaggard)

5.0 Description of Program Management Improvements fro the Decommissioning Program Evaluation

5.1 Establish a Comprehensive Decommissioning Program Perspective

5.1.1 Description

Develop and Document Roles of Program Participants

Recommendations 1. (a), (b), and c) in Section 2.0 of Attachment 1 relate to aspects of refining and documenting the roles and the decommissioning activities of various NRC organizations making up the Comprehensive Decommissioning Program. This restructuring was largely accomplished in FY 2004 as reported in the June 17, 2004, Notice in the *Federal Register* (69 *Federal Register 33946)* that announced that NRC has decided to eliminate the SDMP designation for sites and manage the SDMP sites as "complex sites" under a comprehensive decommissioning program. Further implementation of the comprehensive program is planned for FY 2005 to document in the Decommissioning Operation Manual the roles of the Offices and Divisions involved with the Comprehensive Decommissioning Program.

Roles will also be coordinated with other NRC organizations regarding operating licensed facilities to identify and address potential future decommissioning issues (NMSS/FCSS and NRR). Development of these roles should be derived from the risk-informed approach to identify operating sites with a high potential for subsurface contamination that will also be used to revised inspection guidance (see Section 4.2).

Develop a risk-informed approach to prioritize/manage site decommissioning work

Recommendation 1. (d) in Section 2.0 of Attachment 1 involves developing a risk-informed, prioritization approach to manage the resources allocated to all site-specific NRC staff licensing and inspection activities as well as oversight of operating sites. The goal is to more explicitly consider risk and other decommissioning challenges in allocating an appropriate amount of resources to specific sites and resolving work priorities.

The approach would be used in the budget process as well as budget execution to manage staff expenditure during the operating year and when resource reallocations might be are needed or management decisions on work priority and staff assignments.

An initial approach was developed in FY 2004 to support the budget process. Implementation of this approach will be revised as appropriate during FY 2005 as part of program execution through Operating Plan development and review.

5.1.2 Milestones, Schedules, and Assignments

Restructure and coordinate program	
Define/implement roles of organizations (Orlando)	09/05
Risk informed prioritization approach for resources (Orlando)	09/05
Update approach developed in FY 04	
Train NMSS and Region staff	

5.2 Implement the new Consolidated Decommissioning Guidance

5.2.1 Description

The approach is to combine a variety of training products such as informal training sessions/seminars, tailored licensee meetings, a web site giving case studies and lessons learned, and a stakeholder workshop to discuss and share lessons learned. Initial staff training on the new guidance in NUREG-1757 was completed for NMSS and Regions during FY 2004. Continuing training with more specific training on dose modeling and risk informed approaches as well as new LTR guidance as it is developed will continue during FY 2005-2007. Training staff on new draft guidance will test the practicality of the guidance for use by staff as well as provide earlier implementation of LTR Analysis issues. Case studies and lessons learned provide examples of "best practices" for staff and licensees to follow or adjust for their use.

The approach also will tailor training and meetings to meet the specific needs of the staff and licensees at specific decommissioning sites and to emphasize key topics, including LTR implementation issues from SECY-03-0069 and topics from NUREG-1757.

5.2.2 Milestones, Assignments, and Schedules

<u>Staff training</u>

Develop and conduct periodic seminars on selected topics including (Rodriquez)

LTR Analysis and LTC license

Risk-informed performance based approaches

Flexibility and examples

Lessons Learned

Multi-Agency Radiation Laboratory Protocols (MARLAP)

Develop and conduct training on dose modeling (McKenney) 02/05 05/05

Conduct training for new guidance for LTR Analysis issues 11/05
(Schmidt)

<u>Licensee consultations</u>

Each PM, as part of their ongoing consultations with their licensees, should determine the need and conduct tailored meetings with licensees for new guidance and LTR issues important to the licensee 09/05 FY 2006

Lessons learned web page (Rodriguez/Nalluswami)

Continue to update web page with NRC lessons learned 09/05

Discuss with Agreements States and industry how to collect, preserve, and provide lessons learned (NRC's web site or a separate web site) 09/05

5.3 Improve staff skills and efficient utilization

5.3.1 Description

Improve staff availability in critical disciplines

Reorganization of the Division of Waste Management, reassignment of staff, and hiring critical skills in health physics was completed during FY 2004 and were major improvements. Additional full time equivalents (FTE) in FY 2005, primarily for dose modeling, were approved in the budget process and through signing two Reimbursable Interagency Agreements with DOE for Risk-Based End States and Hanford Tank Reviews and as a result of new legislation for Waste Incidental to Reprocessing. These new activities will provide additional resources to hire dose modeling staff during FY 2005. Hiring these new staff and training them are the key improvements planned for FY 2005. In addition, dose modeling training during FY 2005 will extend the review capability of NRC project managers to conduct selected dose modeling reviews.

Resource tracking process and cost baseline

Develop an FTE expenditure tracking system to compare actual expenditure to budget FTE. Develop a procedure to review the resulting data in operating plans reviews and to reallocate resources as priorities change or unbudgeted work emerges.

Improve the quality of FTE expended by aligning budget C-3 activities and technical activity codes (TAC), deleting inactive TAC numbers, and reporting FTE expenditures from the tracking system to PM s and section chiefs for review.

Train staff and supervisors on improvements.

Use available historical expenditure data to develop a baseline for costs of decommissioning complex sites. Using this baseline cost information, explore the feasibility of a method to measure efficiency and cost effectiveness for decommissioning sites.

5.3.2 Milestones, schedules, and assignments

Improve staff availability/hire (Persinko, Craig, Gruss, Thaggard) 09/05

Expenditure tracking and cost baseline (Orlando) 09/05

Explore the feasibility of a method to measure efficiency and cost effectiveness (Orlando) 09/05

5.4 Expand management performance reviews of all decommissioning site progress

5.4.1 Description

Staff coordinated more in FY 2004 during Decommissioning Board meetings with Regions and FCSS. Based on this experience, develop procedures to use in Decommissioning Board meetings , other meetings, and Quarterly Operating Plan reviews to report/review the progress of work at all decommissioning sites in both DWMEP/DCD and the Regions. Also report progress at operating sites in FCSS and Regions, based on the result of FY 2005 work on an approach to identify operating sites with a high potential of subsurface contamination that could result in future decommissioning problems (see Section 4.2 above).

5.4.2 Milestones, schedules, and assignments

Develop management progress review procedures (Orlando/Nelson) 09/05

5.5 Compare and evaluate NRC's Decommissioning Program

5.5.1 Description

Sharing Information

Use the Decommissioning lessons learned web page developed in FY 2005 (see 5.2) and work with the Office of State and Tribal Programs (STP) to inform the Agreement States (AS) about the availability of the web page through discussions at the stakeholder workshop. Invite the AS to share with NRC their lessons learned implementing the LTR and possibly add to the web page or possibly work with Organization of Agreement States (OAS) to establish its own lessons learned web page. Discuss with STP and AS other methods of sharing information about decommissioning such as agenda items on OAS calls or meetings to exchange decommissioning issues or lessons learned or questions about NRC guidance and LTR analysis issues.

During FY 2004, NRC and DOE completed a reimbursable IA to assist DOE with implementing its End States approach to cleanup. The purpose of the IA is to share with DOE NRC's Risk-Informed, Performance-Based approaches to decommissioning, learn about DOE's approach, and exchange information about common decommissioning issues, such as institutional controls, and realistic scenarios. Implementing the IA during FY 2005-2006 could provide lessons about cleanup of very large complex sites.

During FY 2004 NRC staff agreed to help organize decommissioning sessions at the ANS conference in Denver. Sessions on materials decommissioning and legacy management provide opportunities to seek papers that will address decommissioning lessons learned to share with both US and international stakeholders. Staff will continue to plan and conduct the sessions during FY 2005.

Independent Review

During FY 2004, the staff evaluated the potential of using NRC's Inspector General (IG) to conduct an independent review of the program and requested the review to be conducted during FY 2005 in preparation for the PART review scheduled during FY 2006. The IG agreed to conduct a review of the Decommissioning Program and the staff will provide information requested by the IG.

Continue ACNW independent review of key issues and develop with ACNW its suggestion to schedule working group meetings to support its independent reviews of staff guidance.

5.5.2 Milestones, Schedules, and Assignments

Share lessons learned (Johnson, Rodriguez)

Notify AS of web page, discuss and recommend other AS information sharing	04/05
Share information with DOE by implementing DOE IA	09/05
Organize and conduct decommissioning sessions at conferences (WM 05, ANS, etc.)	09/05

Independent review (Johnson)

Obtain IG response to NMSS request for IG review	01/05
Provide input as requested for IG review	09/05
ACNW reviews of draft guidance	06/05

5.6 Revise annual budget output measures

5.6.1 Description

During FY 2004, revised budget output measures for FY 2005-2006 to be key outcome measures to improve the program. During FY 2005, as part of developing the budget request, use NRC's new FY 2004-2009 Strategic Plan and the Performance Institute's procedure for developing performance measures to consider new outcome and output measures for FY 2006.

5.6.2 Milestones, Schedules, and Assignments

Develop potential new outcome and output measures (Orlando/Johnson) 05/05

5.7 Consider using incentives

5.7.1 Description

During FY 2005, identify and describe recent examples of the use of incentives in the decommissioning program such as Fansteel, Kiski Valley, and approval of intentional mixing of soil.

Interview DWMEP project managers to identify potential incentives for their sites.

Evaluate the examples used and potential new incentives to identify options for types and purpose of incentives as well as criteria for deciding when incentives could be appropriate. Make recommendations to NMSS management.

5.7.2 Milestones, Schedules, and Assignments

Evaluate and recommend incentives (Widmayer) 09/05

5.8 Integrated Decommissioning Improvement Plan (IDIP)

5.8.1 Description

Prepare IDIP (i.e., this document**)** that describes how the staff plans on implementing each of the recommendations from the Decommissioning Program Evaluation, the LTR Analysis recommendations approved by the Commission, and other improvements. The plan includes a description of each improvement and associated milestones, schedules, and staff assignments. Schedules and assignments will be revised as needed during the year and also included in FY 2005 Decommissioning Operating Plan is prepared. The Operating Plan will be used to track the key milestones and schedules.

An initial IDIP was prepared in FY 2004. An early revision in FY 2005 was completed to coordinate schedules and assignments with other decommissioning work when the FY 2005 Operating Plan was completed. The IDIP will be periodically revised as needed and late in FY 2005 based on results from the IG review and updated again in FY 2007 as a result of the OMB PART conducted in FY 2006. Each update will revise or add improvements resulting from the program assessments as well as the staff decommissioning experience and lessons during this time period. This iterative approach to program assessment followed by improvements documents a commitment for seeking “continuous” improvement of the Decommissioning Program.

5.8.2 Milestones, schedule, and assignments

Complete initial IDIP (Johnson)	09/04
Revise initial IDIP based with FY 05 Ops Plan schedules (Johnson)	11/04
Revise IDIP based on further planning (Johnson)	03/05
Prepare for OMB PART (Johnson/Orlando)	11/05
Participate in SFPO PART (Johnson)	
Develop PART documentation notebook (Johnson)	
Develop specific decommissioning PART plan (Johnson/Orlando)	
Update IDIP based on IG review (Johnson)	10/05
Update IDIP based on OMB PART review (Johnson)	12/06

5.9 Communication Strategy (Buckley, Nalluswami, Rodriguez)

5.9.1 Description

The staff plans to enhance its communications with all stakeholders involved with the decommissioning program. During FY 2005, this approach consists of: enhancing the Annual Update to the Decommissioning Program; enhancing the Decommissioning Web Page; developing a Decommissioning Brochure; and conducting periodic stakeholder workshops and meetings.

5.9.2 Milestones, Schedules, and Assignments

Enhance Annual Update (Buckley)	09/05
Enhance the Decommissioning web page (Nalluswami)	09/05
Develop Decommissioning Brochure (Rodriguez)	09/05
Conduct stakeholder workshop (Widmayer)	04/05

6.0 Description of Program Management Improvements from Commission SRM

These improvements resulted from the Commission's direction in the SRM for the October 2004 annual briefing to the Commission as well as other miscellaneous staff generated improvements. Approaches for these topics are described below, recognizing that the scope and specific plans for these items are in a developmental stage.

6.1 Capture and share lessons learned and best practices (Rodriguez)

This activity involves identifying approaches for collecting, preserving, and making available NRC's decommissioning lessons learned. The activities in this area are also addressed in sections 5.2 and 5.5 regarding developing a lessons learned web page, conducting a stakeholder workshop to discuss and obtain lessons learned, asking for suggestions from States, industry groups, licensees, and interested stakeholders about exchanging decommissioning lessons learned in the future.

6.2 Radiological monitoring (McLaughlin)

Guidance will be developed to describe coordination and flexibility in conducting licensee and NRC (Regions, ORISE) radiological surveys. Also include an overview of the recently completed MARLAP manual and how it can be use to improve radiological monitoring and efficiency, planning, and implementation of final status surveys. Training will also be provided to the staff (see section 5.2).

6.3 Finality of decommissioning process (Widmayer)

This activity involves staff continuing to work with EPA and licensees to implement the EPA-NRC MOU. In addition, guidance for implementing the MOU will be added to the Consolidated Decommissioning Guidance in NUREG-1757. The staff also will consider additional measures to achieve effective finality, such as discussing with industry the possibility of seeking legislative changes. Discussions will be held with EPA and suggestions from stakeholders will be obtain at a stakeholder workshop.

6.4 Consistency among State and Federal regulators (Widmayer)

This activity will involve first seeking suggestions from licensees and other stakeholders at a stakeholder workshop and then considering if guidance in NUREG-1757 or other program documents should be added to include approaches for seeking consistency.

6.5 Enhance guidance on flexibility and institutional controls for restricted use (Schmidt/Johnson)

Guidance on flexibility in the decommissioning process will be enhanced by developing the guidance for the following LTR Analysis issues: risk informed graded approach for institutional controls; on-site disposal approval options; removal of material after license termination; realistic scenarios; and intentional mixing of soil. Thus, no new additional guidance is planned at this time, but the existing guidance describing flexibility will be enhanced to include how the above issues contribute to flexibility.

Guidance on institutional controls for restricted use is described in section 4.1 above and no additional guidance is planned at this time.

7.0 Project Management of IDIP

7.1 Products

The regulatory and program management improvements will be documented in the products described below, and Attachment 2 is a matrix that tracks how each improvement will be documented in one or more of the NRC products.

IDIP and Improvement Status Report

Rulemaking for Preventing Future Legacy Sites

Revised Consolidated Decommissioning Guidance

Revised Inspection/Enforcement Guidance

Decommissioning Operations Manual Sections

Input to Budget and Operating Plan

Communication Strategy

Staff skills

7.2 Assignments

The lead staff assignments for the IDIP products are listed below. Attachment 3 provides a listing of all IDIP staff assignments for DWMEP, NRC supporting offices, and involvement by other parties such as ACNW and Agreement States. This includes assignments for each LTR Analysis issue and staff assigned to the program management improvements.

IDIP Project Management (Johnson)

IDIP and Improvement Status Report (Johnson/Gnugnoli)

Rulemaking for Preventing Future Legacy Sites (Kerr/Fredrichs/Shepherd)

Revised Consolidated Decommissioning Guidance (Schmidt/Banovac)

Revised Inspection/Enforcement Guidance (Shepherd)

Decommissioning Operations Manual Sections (Yin/Kalman)

Inputs to Budget, Operating Plan (Orlando)

Communication Strategy (Buckley/Nalluswami/Rodriquez)

Staff skills (Section Chiefs)

7.3 General Schedule of Activities

The general schedule for IDIP activities is summarized below and specific dates are also given for key milestones.

December 2004

Initial IDIP

Team lead assignments

IDIP kickoff meeting

January 2005

Planning guidance and workshop

Planning LTR issue activities

D Board and DD Counterparts briefings

February 2005

Develop IDIP detailed schedule

Refine IDIP scope of LTR/regulatory and program management improvements

Determine supporting assignments for IDIP team

Workshop plan and location decision

Workshop announcement

Workshop agenda and assignments

March 2005

Revise IDIP

Continue scoping issues and topics with management

Prepare for workshop presentations

Arrange State working group to assist with draft guidance

April 2005

Conduct workshop	04/20-21
Prepare draft guidance and ACNW guidance summaries	

May 2005

Prepare workshop summary	
Draft guidance summaries to ACNW	05/31

June 2005

ACNW review/working group meeting	06/15-17

July 2005

Draft guidance for management review	07/14

August 2005

Draft Improvement Summary Report for management review	08/31

September 2005

Complete all scheduled program management improvements and update Operations Manual for improvements	09/30
Draft guidance release for public comment	09/30

October 2005

Final Improvement Summary Report to support Annual Commission Briefing and Annual Update

Revise IDIP based on IG review

7.4 Budget, Resource Estimates, and TAC numbers

Current budget estimates and TAC numbers are given in Attachment 4.

ATTACHMENT 1

LTR ANALYSIS AND PROGRAM EVALUATION RECOMMENDATIONS

The full text of the recommendations from both the LTR Analysis and the Decommissioning Program Evaluation are provided in this attachment as a convenient reference for those using the IDIP.

1.0 LTR Analysis Recommendations from SECY-03-0069, Attachment 10

Restricted Release/Alternate Criteria and Institutional Control

1.1. Clarify the existing risk-informed graded approach for restricting use. Implement with revised guidance and a Regulatory Issue Summary (RIS).

1.2. Emphasize the availability of the option for restricting use with layered and redundant institutional controls with a independent third party that is also responsible for one of the institutional controls. Implement with revised guidance and a RIS.

1.3. Add a new option for restricting use by U. S. Nuclear Regulatory Commission (NRC) monitoring and enforcement of institutional controls, after license termination using either the regulation or legal agreement. Implement with revised guidance (that includes a model restrictive covenant) and a RIS.

1.4. Add a new option for restricting use by an NRC possession- only specific license. Implement with revised guidance and a RIS.

1.5 Note that the staff plans on continuing to monitor the U. S. Department of Energy's (DOE's) Long-Term Stewardship Program changes and reevaluate the potential for restricting use through future site transfers to DOE under the Nuclear Waste Policy Act, section151(b).

1.6 Note that the staff plans on continuing to monitor and participate, where beneficial to the staff, with cooperative, interagency activities to share information and develop solutions to long-term stewardship/institutional control issues (e.g., Environmental Council of States Long-Term Stewardship Subcommittee, DOE Long-Term Stewardship Roadmap development).

1.7 Note that the staff will continue to explore with licensees the use of the recommended approaches for restricted release, pending the Commission's deliberations. The staff will inform the Commission if a licensee is willing to adopt any of these approaches. In addition, if the Commission approves one or more of the options, the staff will seek to implement the option(s) in advance of the RIS and guidance, if it will further the decommissioning process.

Relationship between LTR Release Limits and Other Release Limits

Unimportant Quantities under 10 CFR 40.13(a)

2.1 As the elimination or resolution of inconsistency between the LTR and 10 CFR 40.13(a) is not a current possibility, the staff recommends clarifying that 10 CFR 40.13(a) should not be used as a decommissioning criterion. Implement with a RIS.

Appropriateness of Developing a Separate Unrestricted Release Standard for Uranium and Thorium

3.1 The staff acknowledges that there are some significant inconsistencies in the potential exposures allowed between 10 CFR 20.1402 and other regulations in 10 CFR Part 40. Although the staff is reevaluating some of these 10 CFR Part 40 regulations, the staff does not believe that they are applicable as unrestricted release criteria for source material specific licensees.

3.2 The staff has also found that there are only a limited number of existing source material sites that have not already sought unrestricted release that may find it necessary to cleanup to requirements other than those in 10 CFR 20.1402. If NRC jurisdiction of non-purposefully-used uranium and thorium is transferred to other agencies, as discussed in the JWG's paper, the number of existing NRC and Agreement State source material sites licensed under the AEA, and potential future licensees, would be further reduced. However, because the staff believes that it may be necessary to retain the SDMP/complex decommissioning sites under NRC jurisdiction, the recommendation of the JWG will not result in a significant reduction in the number of overall sites that would benefit from a separate unrestricted standard.

3.3 In summary, the staff believes that the opportunity provided by the existing LTR allows complex source material sites the flexibility to reduce burden through a graded approach (unrestricted use to restricted use to alternate criteria) that can be based on risk. Continued use of the LTR would also maintain 10 CFR 20.1402 as an unrestricted release standard for source material sites that are not so complex so that public confidence is not impacted. As a result, the staff believes that given the flexibility in the existing regulations in 10 CFR 20.1402, 20.1403, and 20.1404,and in conjunction with the limited number of sites that may require cleanup to criteria other than those in 10 CFR 20.1402, it is not appropriate at this time to develop a separate unrestricted release standard for source material licensees. This issue should be discussed in a RIS.

On-Site Disposal under 10 CFR 20.2002

4.1 Continue the current practice of approving on-site disposals with a dose criterion of a "few millirem." This is consistent with staff's goal of preventing future legacy sites, and not unnecessarily creating restricted release sites. This option should be implemented with revised guidance and a Regulatory Issue Summary.

4.2 Permit burial requests with a dose criterion of 1 mSv/yr (100 mrem/yr), as long as such requests are approved contingent on providing additional financial assurance to cover the cost of decommissioning the burial site for license termination. The additional financial assurance satisfies staff's concern with preventing future legacy sites, while leaving this option available provides licensees with maximum flexibility under the existing regulation. Note that this issue is addressed in Attachment 7 as an indicator of the need for increased financial assurance.

Controlling the Disposition of Solid Materials (renamed in IDIP as "removal of material after license termination")

5.1 Describe the relationship between the LTR's unrestricted-release dose constraint and the existing case-by-case approach for controlling the disposition of solid materials. The staff's qualitative judgment, at this time, is that the LTR is protective of public health if materials are removed from a site after license termination for unrestricted use, mainly due to the conservatism in the LTR technical basis and current dose-modeling assumptions, ALARA considerations, and the effects of mixing when residual radioactivity is moved to other locations. This should be clarified in a Regulatory Issue Summary.

5.2 Note that insights from the ongoing technical development associated with the rulemaking effort on controlling the disposition of solid materials can be used in the development of a rationale to further explain the relationship between criteria in the LTR and those for controlling the disposition of solid materials, and support the current view that the LTR is protective of offsite releases after license termination for unrestricted use.

Realistic Exposure Scenarios

6.1 Clarify that more realistic exposure scenarios can be justified by licensees assuming reasonable foreseeable (e.g., a few decades and possibly up to 100 years) land use for the 1,000 year analysis time period. Implement in revised guidance and a RIS.

6.2 Note that the staff will provide to the Commission cases that may implement this approach in the near future for the AAR, Cabot-Revere, Michigan Department of Natural Resources, and Fansteel sites. In addition, if the Commission approves the recommended opinion, the staff will seek to implement the option in advance of the RIS and guidance, if it will further the decommissioning process.

6.3 Tthe staff continues to be committed to improving the other technical areas of dose modeling for decommissioning. These include improving the guidance, pursuing computer model improvements and development, and improving the state of knowledge on individual parameters and processes involved.

Measures to Prevent Future Legacy Sites

Changes to Financial Assurance

Initial Underestimation of Decommissioning Cost:

7.1 Revise regulation to provide for NRC approval of the decommissioning funding plan (DFP) and to require licensees to provide a DFP and financial assurance based on unrestricted release. Provide existing licensees with the option to provide financial assurance for restricted release if the licensee submits and receives NRC approval of a decommissioning plan (DP) demonstrating its ability to meet restricted use criteria, or alternatively, if the licensee implements institutional controls and obtains third party oversight for a restricted release. Implement with a rulemaking, new guidance, and a RIS.

Operational Indicators of Increasing Costs

7.2 Revise regulation to require a licensee to re-evaluate its decommissioning cost estimate, and, if necessary, provide additional financial assurance to cover higher costs, within a reasonable time after an operational event that indicates a potential for increasing decommissioning costs. Operational indicators would include: spills and spread of contamination, groundwater contamination, and other events. Implement with a rulemaking, new guidance, and a RIS.

7.3 Revise regulation, for sites with large radioactive material throughput or liquid processes, to require licensee to periodically obtain subsurface soil and groundwater contamination data to update its decommissioning cost estimate. Implement with a rulemaking, new guidance, and a RIS.

Unavailability of Funds in Bankruptcy Where Financial Assurance Is Provided by Parent Company or Self-guarantee

7.4 Request comments on options under consideration for changing the parent company and self-guarantee mechanisms in a notice of proposed rulemaking, beyond the option in 7.6. Implement in the Federal Register Notice of a proposed rulemaking and a RIS.

Inadequate Financial Disclosure

7.5 Revise regulation to require licensee with a parent or self-guarantee to provide additional certification that its financial statements do not omit off-balance sheet liabilities that would prevent it from meeting the financial test. Implement with a rulemaking, new guidance, and a RIS.

Reaching Assets after Corporate Reorganization If Financial Assurance Proves Inadequate

7.6 Revise regulation to require licensees to provide NRC with agreements that allow NRC to hold parent companies and subsidiaries liable for decommissioning costs. As part of the rulemaking, consider requiring the parent company of licensee subsidiaries to be a co-licensee. Implement with a rulemaking, new guidance, and a RIS.

Investment Losses Reduce Trust Account Balance

7.7 Where decommissioning funds are held in investments that may suffer market losses, revise regulation to require licensee to perform periodic comparison of actual amount of funds in trust to its decommissioning funding requirement, make up any shortfall, and report the funding addition to NRC. Implement in a rulemaking, new guidance, and a RIS.

Accidental Release Increases Decommissioning Cost

7.8 Revise regulation to require certain licensees to obtain onsite property damage insurance to cover the cost of cleaning up accidental releases. Implement in a rulemaking, new guidance, and a RIS.

Changes in Licensee Operations

Chronic Releases

8.1 Revise requirement (10 CFR 20.1406) to remove the "other than renewals" statement, so that both current licensees and new applicants are required to design and operate facilities to minimize contamination. For existing licensees, the emphasis should be on procedural changes. Physical changes to the facility should be made only when procedures fail to reduce releases. There should be a cost-risk-benefit analysis evaluating effects of potential contamination. For example, contamination that impacts groundwater could migrate through large volumes of the subsurface, and potentially beyond the site boundary. This would result in a large cost to remediate, that could be avoided by an investment in prevention. Implement in a rulemaking, revised guidance, and a RIS.

8.2 Increase emphasis on the potential for enforcement sanctions for non-compliance with the requirements related to surveys and monitoring, records of operational and environmental releases, reporting, etc. (i.e., 10 CFR Sections 20.1500, 20.2100, 20.2200, and 40.36). Take enforcement actions, as appropriate, to better focus licensee response to environmental contamination problems resulting from such non-compliance. Implement in revised enforcement guidance and a RIS.

Reporting Deficiencies

8.3 Develop a risk-informed approach that includes requiring definition of sites with "high risk" of subsurface contamination as those with large volumes of long-lived radionuclides, large throughput, or liquid processes. Implement in a rulemaking, revised guidance, and a RIS.

8.4 Implement the risk-informed approach (Recommendation 8.3) to require specific monitoring and reporting programs including subsurface characterization, monitoring, and reporting under two conditions:

1) For sites with “high risk”, at license application or renewal, a minimum plan to define and monitor the subsurface (e.g., three to five wells to identify geologic and hydrologic characteristics of the site), and an annual report of the concentrations of contaminants of concern;

2) For all sites, on experiencing events(s) that contaminate the subsurface, an expanded monitoring and reporting program that adds wells to fully characterize the extent and migration of resultant plume(s), and more frequent monitoring and reporting, approximately quarterly. This would be done in conjunction with financial assurance requirements. Implement in a rulemaking, revised guidance, and RIS.

8.5 Implement the risk-informed approach (Recommendation 8.3) to increase NRC’s inspection focus on sites with “high risk” of environmental contamination concerns by:

1) Increasing inspector qualifications in hydrology, geology, etc.;

2) Increasing inspections and inspector evaluations of record keeping requirements [i.e., 10 CFR 20.1501 (Surveys and Monitoring); 10 CFR 20.2103 (Records of Surveys); 10 CFR 20.2203 (Reports of radioactive material exceeding constraints or limits)];

3) Increasing inspections and inspector evaluations of record keeping requirements of 10 CFR 40.36 and others to identify potential problems early; and

4) Modifying Manual Chapter 2600, to include performance- and risk-informed evaluations, using those in Manual Chapter 2500 as examples.

Implement in revised inspection procedures and a RIS.

2.0 **LTR Analysis Recommendations from SECY-04-0035**

The use of Intentional Mixing of Contaminated Soil

Allow intentional mixing to meet LTR release criteria in limited circumstances, on a case-by-case basis, while continuing the current practice of allowing intentional mixing for meeting waste acceptance criteria at off-site disposal facilities and for limited waste disposals.

3.0 **Decommissioning Program Evaluation Recommendations**

1. Establish a Comprehensive Decommissioning Program Perspective

a) Redefine the objectives and scope of the Decommissioning Program for all decommissioning sites and subsume the SDMP sites.

b) Redefine the roles of organizations involved with the Comprehensive Decommissioning Program (DWMEP, Regions, other NRC Divisions, Commission). No longer require Commission approval role for removing sites from the SDMP list.

c) Consider centralizing DP project management and review for complex materials sites.

d) Define and manage all decommissioning sites using a graded approach to prioritize, allocate, and track both licensing and inspection activities and resources in both Headquarters and all the Regions. The graded approach could be based on site-specific risk insights and decommissioning challenges (see types of licensee and external challenges identified in section 4.2.2).

2. Implement the new Consolidated Decommissioning Guidance tailored to staff and licensee needs. Emphasize key topics such as using flexibility, risk informed pproaches, and realistic dose modeling (PART Q 4.RG1)

   a) Develop case histories and lessons learned as examples of flexibility, risk informed approaches, realistic dose modeling, and prioritization of sites/activities using risk;

   b) Train staff in DWMEP, Regions, other divisions on the Consolidated Guidance and key topics tailored to their decommissioning roles, sites, and decommissioning phase. Share lessons learned and case studies for implementing the guidance at specific sites, especially for issues cross cutting many sites (realistic scenarios, restricted release, engineered barriers, use of risk insights):

   c) Conduct frequent and in-depth consultations with individual licensees to implement guidance and share lessons learned/case studies tailored to specific sites.

   d) Establish a Decommissioning Lessons Learned Page on the Decommission Web site to share among all licensees site-specific lessons learned; issues, and example case studies.

3. Improve staff availability and efficient utilization

   a) Reorganize/reassign/add staff so that the Decommissioning Program and specific sites have sufficient resources, especially for critical disciplines (e.g., health physics, dose modeling, hydrogeology)

   b) Improve the resource tracking process and system to allocate budgeted resources and then track actual staff resource expenditures for individual sites/projects. Use the new process to support management decisions to reallocate resource loading to respond to emerging issues, changing licensee schedules, and approved unbudgeted work. (PART Q 3.4, 4.3)

   c) Establish a baseline for decommissioning costs for specific sites and explore the feasibility of a method to measure efficiency and cost effectiveness (PART Q 3.4, 4.3)

4. Expand management reviews of all decommissioning sites among all NRC organizations involved with existing and future decommissioning (PART Q 3.1)

   a) Coordinate and review information from Headquarters and Regions for existing decommissioning sites to monitor progress, consistency, and efficiency of resolving common policy and technical issues

   b) Coordinate and review information with currently operating licensed sites to identify and resolve conditions or events that could complicate future decommissioning

5. Compare and evaluate NRC's Decommissioning Program to similar programs (PART Q 2.6, 4.4, 4.5)

   a) Share decommissioning lessons learned among NRC and Agreement States.

ATTACHMENT 2: INTEGRATED DECOMMISSIONING IMPROVEMENT PLAN: IMPROVEMENTS AND PRODUCTS MATRIX

IMPROVEMENTS	**PLANNED PRODUCTS**							
Strategic Plan Goals S–safety O–openness E–effectiveness M–management	Improvement Summary Report 9/05	Rulemaking 9/06 P 9/07 F	Consolidated Decom Guidance 9/05 D 9/06 F	Inspection/ Enforcement Guidance 9/05 scope 9/06 D, 9/07 F	Operations Manual 9/05	Communication Strategy 9/05	Budget/ Operating Plan	Staff Skills
Regulatory Improvements								
1. Institutional Controls SE	U		U					
2.Unimportant Quantities E	U							
3.Separate Standard U,Th E	U							
4.On-site Disposal SE	U		U					
5.Removal of Material E	U		U					
6.Realistic Scenarios SE	U		U					
7.Financial Assurance Changes SE	U	U	U					
8.Operational Changes SE	U	U	U	U				
9.Intentional Mixing E	U		U					

IMPROVEMENTS	PLANNED PRODUCTS							
	Improvement Summary Report	Rulemaking	Consolidated Guidance	Inspection/ Enforcement Guidance	Operations Manual	Communication Strategy	Budget/ Operating Plan	Staff
Program Management Improvements								
1.Comprehensive Program –roles, prioritization EM	U				U		U	
2. Implement Guidance–training, licensee meetings EM	U							U
3.Critical Skills Availability, Resource Tracking EM	U				U		U	U
4.Expand Management EM Reviews	U				U			
5.Compare, Evaluate EM Program	U				U			
6.Revise Program Measures M	U						U	
7.Consider Incentives E	U							
8.Improvement Plan EM	U				U			
9.Lessons Learned EMO	U		U					U
10.Rad Monitoring Coordination E	U							

11.Finality/State Consistency E	U		U					
12. Enhance guidance on flexibility and institutional controls E	U		U					
13. Communication Enhancements–web page, brochure, annual update EO	U				U	U		

ATTACHMENT 3: INTEGRATED DECOMMISSIONING IMPROVEMENT PLAN: IMPROVEMENTS AND ASSIGNMENTS MATRIX

IMPROVEMENTS	ASSIGNMENTS					
Strategic Plan Goals S–safety O–openness E–effectiveness M–management	DWMEP Lead	DWMEP Support	Other NRC Support	NRC Technical Review	NRC Legal Review	External Support or Review
Regulatory Improvements	Johnson					
Consolidated Guidance	Schmidt/Banovac					
Institutional Controls SE	Johnson	Banovac Esh	FCSS VonTill RES	DWMEP Kennedy FCSS VonTill	Smith	OAS Ohio ACNW
Intentional Mixing E	Widmayer				Smith	ACNW
On-site Disposal SE	Youngblood		NRR Klementowicz		Smith	ACNW
Removal of Material E	Schmidt	Buckley			Smith	ACNW
Realistic Scenarios SE	McKenney	Thaggard			Smith	ACNW
Inspection and Enforcement Guidance	Shepherd					ACNW
Operational Changes SE	Shepherd	McKenney Peckenpaugh Nalluswami, Brown	NRR FCSS Regions		Smith	OAS ACNW
Rulemaking	Kerr IMNS					
FinancialAssurance SE	Frederichs		NRC contractor		Smith	
Operational Changes SE	Shepherd		NRR Issacs FCSS		Smith	

IMPROVEMENTS	PLANNED PRODUCTS					
	DWMEP Lead	DWMEP Support	Other NRC Support	NRC Technical Review	NRC Legal Review	External Support
Program Management Improvements	Johnson					
1.Comprehensive Program –roles, prioritization EM	Orlando	Johnson	Regions			
2. Implement Guidance–training, licensee meetings EM	Rodriguez	Schmidt Persinko Craig Gruss,Thaggard McKenney				
3.Critical Skills Availability, Resource Tracking EM	Section Chiefs Orlando					
4.Expand Management EM Reviews	Orlando	Nelson				
5.Compare, Evaluate EM Program	Johnson	Rodriguez				
6.Revise Program Measures M	Orlando	Johnson	Whited			
7.Consider Incentives E	Widmayer					
8.Improvement Plan EM	Johnson					
9.Lessons Learned EMO	Rodriguez	Nalluswami	OIS			
10.Rad Monitoring Coordination E	McLaughlin	Boby Abu-Eid	ORISE contract			

IMPROVEMENTS	PLANNED PRODUCTS					
	DWMEP Lead	DWMEP Support	Other NRC Support	NRC Technical Review	NRC Legal Review	External Support
11.Finality/State Consistency E	Widmayer					
12. Enhance guidance on flexibility and institutional controls E	Schmidt	Johnson				
13. Communication Enhancements–web page, brochure, annual update EO	Rodriguez Nalluswami Buckley		OIS			

ATTACHMENT 4: IDIP BUDGET AND RESOURCE TRACKING/TAC NUMBERS

Planned accomplishment: 355260 Materials and Fuel Cycle Decommissioning Licensing Actions Sub PA: 355260M Policy and Issue Resolution						
Integrated Decommissioning Improvement Plan (IDIP) Activities						
	Title of Activity Other sub activities	TAC number	Budget FY05	Budget FY06	Budget FY07	Assigned staff
IDIP Project Management	IDIP project management	L60612				Robert Johnson
LTR Regulatory Improvements			3.0/150K	2.0/100K	1.0/50K	
	Proposed rulemaking/guidance **Reduce likelihood of funding shortfalls for decommissioning under the license termination rule** Changes to financial assurance Changes to licensee operations	LA0056	1.4/150K	1.3/100K		Leslie Kerr Tom Fredrichs Jim Shepherd
	Final rulemaking/guidance **Reduce likelihood of funding shortfalls for decommissioning under the license termination rule**	LA0057			0.7/50	same as proposed rule above
	Draft Decommissioning guidance **Resolve LTR implementation issues** Institutional controls/restricted use/POL On-site disposals Removal of material Realistic scenarios Intentional mixing of soil Other	LA0086	1.2/0K			Duane Schmidt Kris Banovac Robert Johnson Dave Esh John Peckenpaugh Sam Nalluswami Tom Youngblood John Buckley Chris McKenney Derek Widmayer

Integrated Decommissioning Improvement Plan (IDIP) Activities						
	Title of Activity	TAC number	Budget FY05	Budget FY06	Budget FY07	Assigned staff
	Final Decommissioning guidance **Resolve LTR implementation issues**	LA0087		0.7/0K	0.3/0K	same as draft above
	Revised inspection and enforcement guidance	LA0088	0.4/0K			Jim Shepherd Chris McKenney Robert Johnson Dave Brown
Program Management Improvements		LA0089	0.8 (1.5)	1.3	TBD	
	Program management improvements Comprehensive program implementation Guidance implementation/training Critical skills Expand management reviews Compare, evaluate program Revise program measures Consider incentives Improvement plan Lessons learned Rad monitoring coordination Finality State consistency Communication strategy					Robert Johnson Nick Orlando Dave Nelson Rafael Rodriguez Duane Schmidt Chris McKenney Kris Banovac Sam Nalluswami Giorgio Gnugnoli Derek Widmayer Tom McLaughlin Boby Abu-Eid
	Prepare for Decommissioning PART	LA0090				Robert Johnson Nick Orlando John Buckley

	Conduct Decommissioning PART	LA0091				Robert Johnson Nick Orlando John Buckley