

**ASSUMPTIONS USED TO DEVELOP SDMP AND  
COMPLEX DECOMMISSIONING SITE GANTT CHARTS**

## **ASSUMPTIONS USED TO DEVELOP SDMP AND COMPLEX DECOMMISSIONING SITE GANTT CHARTS**

### GENERIC ASSUMPTIONS:

- Staff will meet with licensees before the submission of the Decommissioning Plan (DP), to ensure that the licensee understands the type and quality of information needed in a DP.
- No major policy decisions will be needed to complete the decommissioning.
- Adequate staff resources will be available to accomplish tasks when scheduled, provided the tasks do not all occur simultaneously.
- NUREG-1727, "NMSS Decommissioning Standard Review Plan" (SRP) provides sufficient guidance to evaluate any site-specific issues raised in the DP.
- If necessary, staff will be adequately trained in the use of the SRP.
- All requests for additional information (RAIs) will be developed using the Division of Waste Management's "streamlined approach to licensing actions," and only one RAI will be generated per licensing action or licensee submission [DP, Final Status Survey Report (FSSR), etc].
- Technical Evaluation Reports will be developed to serve as the basis for all RAIs.
- It will not be necessary for licensees to collect significant additional information to respond to an RAI (i.e., large numbers of additional samples).
- Licensees will be available to meet with the NRC staff in a timely fashion, to ensure that the planned schedule is met.
- Staff will use a multiplication factor of 2.0 to convert level of effort (i.e., actual task time) to "calendar" time in developing Gantt charts (basis: experience and budget load factor).
- DPs will be approved as a license amendment.
- All sites requesting license termination with restrictions on future site use will require the development of an environmental impact statement (EIS), and approval of the DP will include a public hearing.
- All sites requesting license termination without restrictions on future use will only require the development of an environmental assessment/finding of no significant impact, and approval of the DP will not include a public hearing.
- All licensees have sufficient financial assurance to cover the cost of decommissioning.

## SPECIFIC ASSUMPTIONS:

### A. Sites Requesting License Termination under Unrestricted Use

#### Acceptance Reviews:

- DP will be complete when submitted and meet acceptance criteria.
- Licensing Assistant's (LA's) concurrence will be no more than 3 days.
- Staff will use a standardized "acceptance" letter [see Office of Nuclear Material Safety and Safeguards (NMSS) Decommissioning Handbook, Appendix G].
- The Office of the General Counsel (OGC) will not need to concur on acceptance review letters.
- Section Leader/Branch Chief (SC/BC) concurrence will be no more than 5 days.
- Staff will use acceptance review checklists (Appendix A to NUREG-1727) to perform acceptance reviews.
- Acceptance review will include a limited technical review and be completed within 90 days

#### Federal Register Notices (FRN's):

- Staff will always prepare an FRN when a DP is received.
- Staff will use a standard FRN to announce its intent to amend the license to incorporate the DP.
- LA concurrence will be no more than 3 days.
- SC/BC concurrence will be no more than 5 days.
- OGC review not needed for the FRN.
- There will be FRNs will be published within 7 days of being sent to the Publications Branch.

#### Develop DP Review Plan:

- SC review/approval only.

#### DP Evaluation:

- No unresolvable or policy-challenging issues will be raised as a result of the review of the DP.

#### Final Radiological Status Surveys:

- In general, confirmatory surveys will not be conducted at the end of licensee remediation activities. Instead, the Regions will perform in-process, side-by-side confirmatory surveys and rely on the licensee's quality assurance (QA) program.
- No additional cleanup will be required and no significant additional information will need to be collected to support the FSSR.

#### Removal of site from the Site Decommissioning Management Plan (SDMP):

- The Commission will approve the staff's recommendation to remove the site from the SDMP.
- States, U.S. Environmental Protection Agency (EPA), or others will not challenge the staff's decision to remove the site from the SDMP and terminate the license.

## B. Sites Requesting License Termination under Restricted Use

### Acceptance Reviews:

- DP will be complete when submitted and will meet acceptance criteria.
- LA concurrence will be no more than 3 days.
- Staff will use a standardized “acceptance” letter (see NMSS Decommissioning Handbook, Appendix G).
- OGC will not need to concur on acceptance review letters.
- SC/BC concurrence will be no more than 5 days.
- Staff will use acceptance review checklists (Appendix A to NUREG-1727) to perform acceptance reviews.
- Acceptance review will include a limited technical review and be completed within 90 days

### Federal Register Notices:

- Staff will always prepare an FRN when a DP is received.
- Staff will use a standard FRN to announce its intent to amend the license to incorporate the DP.
- LA concurrence will be no more than 3 days.
- SC/BC concurrence will be no more than 5 days.
- OGC review will not be needed for FRN.
- FRNs will be published within 7 days of being sent to the Publications Branch.

### Phased Review

- Following the successful acceptance review, the detailed technical review will be conducted in two phases
- Phase 1 will consist only of a review of the institutional control and financial assurance provisions of the DP.
- Phase 1 can be completed successfully in 9 months with a single request for additional information (RAI).
- Phase 2 will address all other aspects of compliance with the License Termination Rule.
- The environmental impact statement will not be initiated until Phase 2.

### 10 CFR 20.1405 Letters:

- Staff will use a standard 10 CFR 20.1405 letter to solicit input from interested parties.
- LA concurrence will be no more than 3 days.
- SC/BC concurrence will be no more than 5 days.
- OGC will not need to review 10 CFR 20.1405 letter(s).

### Develop DP Review Plan:

- SC review/approval only.

### DP Evaluation (including EIS development):

- One scoping meeting will be held to support the development of the EIS.
- Environmental and Performance Assessment Branch (EPAB) will have the lead for developing the EIS and will be supported by Decommissioning Branch (DCB) and a contractor.

- EPAB team will prepare FRN - "Intent to Develop EIS."
- DCB staff will prepare the draft Safety Evaluation Report during the development of the draft EIS (DEIS).
- One RAI will be required in support of each of the DEIS and FEIS.
- No unresolvable or policy-challenging issues will be raised as a result of the review of the DEIS.
- All comments on the DEIS will be submitted within the prescribed comment period.
- The Commission will approve/concur on the staff's Record of Decision.
- The DP will be approved after the public hearing.

Final Radiological Status Surveys:

- In general, neither the Regions nor ORISE will conduct confirmatory surveys at the end of licensee remediation activities. Instead, the Regions will perform in-process, side-by-side confirmatory surveys and rely on the licensee's QA program.
- No additional cleanup will be required and no significant additional information will need to be collected to support the FSSR.

Removal of site from the SDMP:

- The Commission will approve the staff's recommendation to remove the site from the SDMP.
- States, EPA, or others will not challenge the staff's decision to remove the site from the SDMP and terminate the license.