

**STATEMENT OF BASIS**

Low Level Radioactive Waste Disposal Facility

EnergySolutions, LLC  
 423 West 300 South, Suite 200  
 Salt Lake City, UT 84101

April 24, 2013

On October 24, 2012, after a reduction in workforce, EnergySolutions (ES) submitted a request to revise Appendix I, "*Organization*," (CD12-0275) to the Division of Radiation Control (DRC). DRC staff reviewed the request and requested additional information (RFI) on December 14, 2012, but ES underwent a second workforce reduction. Due to the second workforce reduction, on February 4, 2013, ES revised their previous request and provided a revision to the proposed Appendix I, "*Organization*," (Appendix I) which documented changes to job titles, and demonstrated that the overall responsibilities and qualifications of personnel for each modified job title were not changed. Based on a review of the revised request, DRC staff sent ES another request for additional information (RFI) dated March 21, 2013. ES submitted a third proposed revision (Rev. 24) of Appendix I, dated March 9, 2013 (CD-13-0076).

DRC staff has reviewed all submitted information and all responses to DRC's RFI's. The new organizational structure for ES's Clive facility appears to be satisfactory and adequate to provide sufficient oversight and expertise for meeting occupational and public safety requirements. The changes requested are minor, administrative in nature, and do not include monitoring, sampling, or health and safety issues. Therefore, the Director in consultation with the Attorney General's Office has determined that in accordance with R313-17-2 a public comment period is not required for this request. Below is a summary of the proposed changes:

**License Change Summary**

<b>License Condition</b>	<b>Minor/Major Change</b>	<b>Description of Changes</b>
21	Minor	Changed the Title, "Director of Health Physics (DHP)" to "Radiation Safety Officer (RSO)."
31	Minor	Changed the Title, "DHP" to "RSO." Changed personnel filling the position of RSO.
32	Minor	Changed the Title, "DHP" to "RSO." In paragraph 32.A changed the reference to Appendix I from Rev. 23 dated November 7, 2011 to Rev. 24 dated March 9, 2013.
39.C.	Minor	Changed the Title, "DHP" to "RSO."
81	Minor	Changed the Title, "DHP" to "RSO."
84.A.v.(b)	Minor	Changed the Title, "Health Physics Technician (HPT)" to "Radiation Safety Technician (RST)."
86.B.ii	Minor	Changed the Title, "HPT" to "RST."

### **License Changes**

The proposed changes to the license reflect changes to job titles at ES's Clive facility. Job responsibilities and duties for the modified job titles did not change from the original responsibilities and duties.

### **Changes Not Approved**

In addition to the revisions to Appendix I requested in the February 24, 2013 request, the Licensee requested that the reference to Appendix I be removed from License Condition 32.A. At present, Appendix I contains the Organization Plan which was submitted with ES's 2005 RML renewal application. Since Appendix I was included in the 2005 renewal application, Appendix I is considered to be part of the license issued in 2008. The Licensee has requested that the reference to Appendix I be removed from License Condition 32.A in their 2012 RML renewal application. Therefore, the DRC has determined that removal of the reference to Appendix I will be reviewed as the 2012 RML renewal application is processed and the reference to Appendix I in License Condition 32.A will not be removed at this time. Although the reference to Appendix I in License Condition 32.A will not be removed at this time, the reference will be updated to reflect the changes proposed by this action.