

---

## INSPECTION MANUAL CHAPTER 2565

---

### REGIONAL INSPECTION ACTIVITIES FOR NAVAL REACTORS NAVAL VESSELS UNDERGOING DECOMMISSIONING

#### 2565-01 PURPOSE

This Inspection Manual Chapter (IMC) establishes oversight responsibilities and provides guidance for a regional inspection program of the Naval Reactors (a joint Navy and Department of Energy Program) Surface Ship Support Barge (SSSB). The SSSB is currently located in Newport News, Virginia and will be transferred to Mobile, Alabama for radiological decommissioning. Some waste disposal work will be performed in Andrews, Texas as well. The Nuclear Regulatory Commission's (NRC) SSSB inspection process is one mechanism in which the NRC will provide Naval Reactors with oversight consisting of independent analyses to assist Naval Reactors in fulfilling its decommissioning responsibility in support of public health and safety.

#### 2565-02 OBJECTIVES

The responsible regional office will perform technical evaluations, inspections and document the results these activities of the SSSB related to design, equipment installation, and decommissioning activities conducted by the Naval Reactors and its contractors that may radiologically affect public health and safety. This inspection manual chapter supports fulfillment of NRC's responsibility for providing oversight and inspection services of the SSSB as agreed in a September 27, 2019 (with subsequent modifications) interagency agreement (IA) between the NRC and Naval Reactors (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20177A172). It is important to note that the SSSB is not an NRC licensed facility and therefore, NRC's responsibilities with respect to the SSSB are limited to that established in the IA and summarized in Appendix 1 to this IMC. In accordance with the IA, the Director, Office of Nuclear Material Safety and Safeguards (NMSS), is assigned responsibility for ensuring the implementation of the IA and the Project Manager, NMSS, is designated as the NRC point of contact for all communications relating to carrying out the provisions of the IA. The IA allows for Naval Reactors to reimburse the NRC for oversight and inspection services. Therefore, project specific CACs will be issued for assigned NRC personnel associated with costs for oversight and inspection services.

The objective of the NRC's oversight and inspection program is to establish requirements and guidance for NRC staff enacting its oversight and inspection responsibilities. Inspection, review, and consultation are methods in which NMSS may advise Naval Reactors of whether there is reasonable assurance that the Naval Reactors SSSB decommissioning activities protect the public health and safety from potential radiological and environmental consequences. NRC activities shall be conducted in accordance with official guidance and procedures but shall not be subject to Commission actions required by law for licensed facilities or activities. To implement

this, Inspection Manual Chapter (IMC) 2561, Reactor Decommissioning Inspection Program and applicable inspection procedures will be used to inform the staff in conducting the SSSB inspection activities, with a few exceptions as discussed in section 06.01.

Naval Reactors has responsibility for the public health and safety associated with the SSSB project per the Atomic Energy Act of 1946, as amended. The focus of regional inspections will be on the SSSB vessel or at sites of dismantlement and disposal operations and decommissioning activities that could potentially impact public health and safety. The responsible regional office will inform its inspection visits, as needed, by reviewing the SSSB Decommissioning Work Plan (DWP), work plans required per the DWP, the request for recommendation to approval transfer and other site documents, and descriptions included in the Naval Reactors SSSB technical specifications and documented safety analyses. The applicable (radiological) requirements and commitments in these documents will be used by the NRC inspection staff as the criteria for the conduct of the NRC's SSSB inspection program on the SSSB and at the decommissioning sites.

## 2565-03 DEFINITIONS

- 03.01 Inspection Activities. The NRC inspection staff will review, evaluate, and conduct radiological surveys, including the collection of environmental measurements, as needed, related to implementation of Naval Reactors naval vessel dismantlement and disposal operations and decommissioning activities to ensure radiological protection of public health and safety. The activities may include review and examination of documents and drawings. NRC staff with technical expertise in areas such as engineering, decommissioning, health physics, environmental monitoring, and quality assurance will be conducting the inspection, as needed, based on the scope of the inspection visit. In addition, NRC inspection activities may involve direct observation and documentation of the Naval Reactors decommissioning activities the effectiveness of the Naval Reactor's implementation of programs and procedures that relate to health and safety on the vessel retained premises and potential offsite impacts due to vessel dismantlement and disposal operations.
- 03.02 Project Premises. The locations for naval vessel decommissioning may include one or more shore-based locations. Naval Reactor's contracts for naval vessel dismantlement and disposal will require that the NRC have unfettered access to the naval vessel and support facilities when the vessel is present at any shore-based facility for dismantlement and disposal or related work.

For SSSB, dismantlement and disposal work will be conducted in Virginia, Alabama and Texas as follows: Mobile, Alabama (65%), Norfolk, Virginia (25%), and Andrews, Texas (10%).

- 03.03 Inter-Agency Agreement Decommissioning Activities. Naval Reactor's contract with the decommissioning contractor company requires dismantlement and disposal to be in compliance with all NRC regulations that would apply to an NRC licensee or an unlicensed company undergoing NRC decommissioning regulatory oversight. In the contract, Naval Reactors specifies that the company must conduct activities in accordance with all NRC requirements. By contract, Naval Reactors also requires that the company provide the same information and access to the NRC as would be required for an NRC licensed decommissioning process. However, since the facility will not hold an NRC license, the NRC will prepare technical evaluation reports for the Navy

in lieu of safety evaluation reports. Inspectors will provide Inspection Reports (IR) consistent with NRC practice for NRC licensee and non-licensees, except that IRs will be provided to the Navy by the Regional Branch Chief, with NMSS PM. NRC will make IRs publicly available in ADAMS.

Under contract to Naval Reactors, the decommissioning contractor company prepares a DWP in accordance with NRC requirements for applicable sections of a Decommissioning Plan/License Termination Plan. The DWP and any subsequent revision will be submitted to the NRC for review. Under the IA with Naval Reactors, NRC staff conduct the same reviews and inspections as it would for an unlicensed site whose radiological decommissioning was regulated by the NRC. The review of the DWP will be managed by the Project Manager and any Requests for Additional Information (RAI) for the decommissioning contractor company will be provided to Naval Reactors. Similarly, any additional information submittals provided to Naval Reactors will be required to be addressed by the contractor under Naval Reactor's contract with the decommissioning contractor company. If the DWP is determined to be adequate, the NRC will prepare a Technical Evaluation Report and a draft Environmental Assessment (EA) and draft Finding of No Significant Impact (FONSI), provided an Environmental Impact Statement (EIS) is not required to support the Navy's decision on the DWP. If the DWP is acceptable, the NRC would recommend that Naval Reactors approve the Plan and issue the EA and FONSI or EIS, and Naval Reactors would take that action in accordance with the IA and contract provisions.

Following Naval Reactors' acceptance of the DWP from the contractor, the contractor will prepare a Request for Transfer of Possession of the vessel. This transfer would only occur after the NRC staff has reviewed the request and provides Naval Sea Systems Command a recommendation to approve the transfer. The Request for Transfer of Possession should include the information similar to that specified in 10 CFR 30.34(b)(2). Although no license exists to be transferred, the NRC's review will be similar to a review performed for a proposed license transfer, including review of the decommissioning company's qualifications of key personnel and technical capabilities to ensure that the decommissioning contractor company will be able to complete the vessel decommissioning, dismantlement and disposal. This NRC review can be done in parallel with the NRC review of the DWP. Upon conclusion of the review(s), the NRC would make a recommendation to Naval Reactors on whether the transfer of possession of the vessel to the decommissioning contractor company should proceed.

Subsequent to the authorized transfer by Naval Reactors, NRC staff will commence inspection activities of the dismantlement and disposal to ensure compliance with NRC regulations in the same manner that the NRC would for an NRC licensed decommissioning process. The NRC staff reviews and inspections are to be performed by closely following the guidance outlined in NRC IMC 2561, and other publicly available inspection manual chapters and inspection procedures as appropriate, such as IMC 2545 for decommissioning research reactors. The inspections will also monitor for compliance with the Naval Reactors approved DWP. The inspection focus will be on radiological hazards and implementation of the DWP.

NRC inspectors finding of violations or recommendations will be provided to and communicated with representatives of Naval Reactors rather than to the

decommissioning contractor company. If corrective actions or penalties are recommended by the NRC in accordance with its inspection practices, it is the responsibility of Naval Reactors to ensure corrective actions or enforcement of penalties.

Non-radiological hazards, including occupational safety and health, Resource Conservation and Recovery Act hazardous materials, Polychlorinated Biphenyls, and asbestos containing materials, are regulated by other State and Federal agencies in the same manner that these hazards are regulated in non-nuclear Navy ship dismantlement and recycling. Note that, in accordance with Executive Order 12196, issued February 26, 1980; section 19 of the OSH Act and 29 CFR 1960 does not apply to military personnel and uniquely military equipment, systems, and operations.

Consistent with IMC 1007, "Interfacing Activities Between the Regional Offices of NRC and OSHA", and the September 6, 2013 Memorandum of Understanding with OSHA contained in Appendix B, NRC does not conduct industrial safety and health inspections at NRC-licensed facilities and will not conduct them for SSSB. However, if in the course of inspections of radiological and nuclear safety, NRC inspectors observe industrial safety and health hazards or receive complaints from employees that raise concerns of occupational health and safety, the NRC will notify Naval Reactors. Urgent safety issues should be raised immediately, while non-urgent matters may be documented in an IR.

Because the NRC services are provided in accordance with the IA, inspection/technical evaluation reports will be placed in ADAMS as publicly available.

Following completion of vessel dismantlement and disposal, the NRC will perform any necessary final inspections, confirmatory surveys, and technical reviews to ensure that all parts of the naval vessel were properly disposed of and that the dismantlement sites are suitable for unrestricted release. The IA allows the use of NRC's contractors, Oak Ridge Associated Universities (ORAU) and the Radiological Environmental Sciences Laboratory (RESL), to perform confirmatory surveys and independent analysis of samples. The inspectors must coordinate the use of contractor services with the Project Manager to ensure Technical Assistance Requests are approved for the planned work. The NRC Project Manager will provide the results of such final reviews in a "Closure" letter with a Technical Evaluation Report to document NRC's closure of our activities in lieu of a license termination letter to Naval Reactors. Naval Reactors will implement any required action prior to contract closeout with the decommissioning contractor company.

Throughout this entire process, it is the intention of both the NRC and Naval Reactors that vessel dismantlement and disposal be conducted, as closely as possible, in accordance with NRC regulations. This includes NRC inspectors interacting, observing and interviewing appropriate staff during decommissioning planning and work activities. However, the NRC will not act directly as a regulator of the decommissioning contractor company but rather would provide all recommended approvals, recommended disapprovals, requests for additional information, inspection results, and recommended enforcement actions or penalties to Naval Reactors. It is Naval Reactor's intent, and the contract with the decommissioning company requires, that the Navy enforce the NRC's recommended actions, including violations, without any addition to or subtraction

from, the NRC's recommendations. NRC IRs and recommendations will be provided to the decommissioning contractor as a "copy to" when they are provided to Naval Reactors. (Similarly, decommissioning company documents provided to the Navy will be provided as a "copy to" to the NRC in order to enhance communications.)

## 2565-04 RESPONSIBILITIES AND AUTHORITIES

### 04.01 Director, Office of Nuclear Materials Safety and Safeguards

- a. Approves the Inter-Agency Agreement and any modifications.

### 04.02 Regional Administrator

- a. Ensures that the inspection program is conducted and documented in accordance with this instruction.
- b. Ensures that Regional staff have the proper technical discipline and expertise and are available and perform inspection activities.

### 04.03 Director, Division of Nuclear Material Safety, Regional Office

- a. Develops and assesses the effectiveness of the conduct of the program.
- b. Prepares budget and staffing requests for the program.
- c. Ensures that the applicable Branch within the Region conducts and documents the program in accordance with this IMC and IMC 0610. "Nuclear Material Safety and Safeguards Inspection Reports".

### 04.04 Chief, of the responsible Regional Branch

- a. Oversees the planning and coordination of inspection activities
- b. Requests technical expertise from other Regions or Headquarters, as needed.
- c. Provides timely documentation of inspection activities and results.
- d. Participates in program review meetings, as appropriate.

### 04.05 Director, Division of Decommissioning, Uranium Recovery, and Waste Programs.

- a. Ensures the NRC plans and implements NRC activities for the Naval Reactors Naval Vessel Decommissioning Program.
- b. Ensures that the NMSS naval vessel inspections are implemented for appropriate risk-significant activities at the decommissioning facility are in accordance with this IMC.

- c. Provides applicable contracted technical assistance.
- d. Coordinates preparation of the NRC's naval vessel oversight and inspection program.
- e. Integrates NRC's naval vessel monitoring programs with other DUWP activities.

04.06 NMSS Project Manager

- a. Ensures that the applicable Regional Division of Nuclear Materials Safety receives necessary project documents related to its inspection responsibilities.
- b. Provides guidance and coordinates with the applicable Region on scheduling on-site and shipboard inspection visits and provides suggestions to the inspector on what areas should be inspected based on vessel interactions and document reviews.
- c. Acts as the NRC's point of contact with Naval Reactors for the SSSB per the IA between the Naval Reactors and the NRC, September 27, 2019, as modified (ADAMS Accession No. ML20177A172). Coordinates with the NRC inspector and the Naval Reactors SSSB Project Manager. Per the Naval Reactors-NRC IA, the NMSS PM participates in discussing the inspection results with the respective Naval Reactors Project Manager.

04.07 Regional Inspector

- a. Performs inspection functions per this IMC.
- b. Coordinates with the NMSS Project Manager and Naval Reactors representatives when planning and executing inspection visits.
- c. Plans and implements inspection activities, including the use of contracted services (RESL and ORAU) in coordination with NMSS's designated Project Manager for the SSSB
- d. Documents inspection visit results in periodic inspection reports.
- e. Participates in SSSB program review meetings as appropriate.

2565-05 REQUIREMENTS

05.01 Inspection activities will be conducted in accordance with this IMC because the naval vessel undergoing decommissioning is not licensed by the NRC. Inspection activities may require ad hoc planning in coordination with the NMSS Project Manager. Per the Naval Reactors-NRC IA, the NRC will use the descriptions, operating procedures and vessel conditions, included in the Naval Reactors naval vessel technical specifications and the documented safety analysis as the criteria for conduct of its monitoring program.

Also, the NRC will use documents that Naval Reactors provides to the NRC that address public health and safety, such as the DWP and associated commitments such as providing task decommissioning work plans and evaluations as criteria to conduct its inspection program.

- 05.02 Regional staff will communicate results of inspections with Naval Reactors through distributions typical of routine inspection reports, including close coordination with the NMSS Project Manager and, with coordination and consent of Naval Reactors, with appropriate host State officials (see paragraph 03.03). As described in the Naval Reactors-NRC IA, the NMSS Project Manager is NRC's point of contact with the Naval Reactors for the SSSB.
- 05.03 Inspection results and any associated technical evaluations are to be documented as inspection reports (IRs) transmitted via cover letter from the Regional Branch Chief to the Naval Reactors Project Manager, with a copy to the NMSS Project Manager and the host state. Also, the IRs will detail the activities monitored to document that proper evaluations have been completed. All reports are official NRC records and must be retained in accordance with the approved schedule of records retention and disposal (Office of Administration) and will be made publicly available in ADAMS.
- 05.04 Inspection visits should be conducted during times when the inspector can observe the most risk-significant activities, as warranted. The inspector should keep the NMSS Project Manager informed about upcoming inspection visits and the intended scope. Inspections visits should be conducted commensurate with the decommissioning activities to be conducted and their associated risk levels and shall be conducted at a minimum frequency of twice per year, provided active decommissioning activities are ongoing on the vessel or at a site.

#### 2565-06 GUIDANCE

- 06.01 The unique aspects of the decommissioning work of a naval vessel and NRC's role makes the use of specific inspection procedures inappropriate; however, as described in the IA, the NRC will generally conduct inspections consistent with the guidance outlined in IMC 2561 and its associated procedures. However, the timing and effort of naval vessel inspections will likely differ from that for a typical decommissioning site and some procedures may not be applicable for decommissioning of a naval vessel. For this reason, inspection activities should be used as a guide, and planned on an ad hoc basis in coordination with the NMSS Project Manager. Similarly, the lead inspector assigned to monitor the naval vessel decommissioning activities, should coordinate with the Naval Reactors operations representatives and keep the NMSS Project Manager informed. Both activities should allow the NRC enough planning time to be observe higher risk activities such as removal of highly contaminated components or when similar higher risk activities are conducted, should the NRC decide to inspect the specific activity.

Naval Reactors is not licensed and there are not any license conditions nor NRC acceptance criteria for inspection of Naval Reactors under the IA. Similar to during an NRC inspection, Naval Reactors and decommissioning contractor documents provided to the NRC Inspector during the inspection visit should not be kept or docketed.

However, there are many Naval Reactors documents with Naval Reactors commitments to NRC that the NRC staff may need to use, based on the scope of their inspection visit, such as the Naval Reactors DWPs, characterization plans, and task work plans that are submitted to NRC for review for acceptability and associated comment. Further, implementation of Naval Reactors commitments in such documents should be verified, based on the scope of the inspection visit and the schedule of the decommissioning. The DWP, which will be subject to NRC staff review, will provide Naval Reactors decommissioning strategy and schedule, as well commitments for the SSSB contractor, such as submittal of specific work plans for NRC review for acceptability and actions that Naval Reactors contractor will complete before conducting certain demolitions or remediation

The inspector should be familiar with the Naval Reactors-NRC IA for understanding policy and interagency responsibilities for the naval vessel. During inspections, interactions should be consistent with this policy, the communication plan, the Naval Reactors-NRC IA, and, as applicable, expectations or commitments made in any NRC Technical Evaluation Reports and the NRC Headquarters' comment letters on the submitted Naval Reactors SSSB work plans.

- 06.02 The Region should coordinate with NMSS in a timely manner if there are potentially significant health and safety concerns identified during inspection visits.
- 06.03 Any sensitive information should be documented in accordance with NRC procedures. The staff should be mindful that for some inspection activities, there may be a need to refer to historical information or Naval Reactors documents that might contain sensitive nonpublic information. The content of the licensing documents may involve the transfer of naval nuclear propulsion information (CUI//SP-NNPI) controlled by Title 42 of the United States Code, Chapter 23, Section 2168, "Dissemination of unclassified information," and should be protected accordingly. Reference to NRC Docket No. [TBD] should be included in any inspection report's ADAMS profile.
- 06.04 Inspection visits should include a meeting with Naval Reactors and the associated contractor, as appropriate, to obtain an independent review of the status of decommissioning/dismantlement as it pertains to protecting the public health and safety. At the staff's discretion and based on those discussions, the staff will decide whether additional interviews with Naval Reactors or decommissioning contractor staff or observation of vessel activities should be conducted.

## 2565-07 REFERENCES

NRC, 2020, Interagency Agreement (IA) between the NRC and Naval Reactors (ML20177A172), June 19, 2020.

GAO, 2018, GAO Report, "Aircraft Carrier Dismantlement and Disposal – Options Warrant Additional Oversight and Raise Regulatory Questions, August 2018.

NRC, 1997, "10 CFR Part 20, et al., Radiological Criteria for License Termination; Final Rule, *Federal Register*, July 21, 1997, 62 FR 39057.



NRC, 2000, NUREG-1575, Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM). EPA 402-R-97-016, Rev. 1, DOE/EH-0624, U.S. Department of Defense (DoD), U.S. Department of Energy (DOE), U.S. Environmental Protection Agency (EPA), and NRC, Revision 1, issued August 31, 2000, Washington, D.C., ADAMS Accession No. ML003761445.

NRC, 2001, List of Corrections to Multi-Agency Radiation Survey and Site Investigation Manual, Revision 1, Federal Register Notice, 66 FR 34727, pages 34727-34728 (2 pages).

NRC, 2004, Regulatory Analysis Guidelines of the US Nuclear Regulatory Commission, NUREG/BR-0058, Revision 4, NRC, Washington, DC, September 30, 2004, ADAMS Accession No. ML042820192.

NRC, 2006, NUREG-1757, Consolidated Decommissioning Guidance, Volume 1, Revision 2 and Volume 2, Revision 1, U.S. Nuclear Regulatory Commission, Washington, D.C., September 2006.

Inspection Manual Chapter (IMC) 2561, Decommissioning Power Reactor Inspection Program, March 2018.

IMC 1007, Interfacing Activities Between the Regional Offices of NRC and OSHA, May 2016.

IMC 2545, Research and Test Reactor Inspection Program, June 2020.

IMC 0610, Nuclear Material Safety and Safeguards Inspection Reports, May 2004.

IMC 1007, Interfacing Activities Between Regional Offices of NRC and OSHA, May 2016

END

APPENDIX A to IMC 2565

Summary of NRC and Naval Reactors MOU/ Interagency Agreement Implementation for the SSSB and other Navy Surface Ships

<u>SSSB Decommissioning Aspect</u>	<u>MOU/IA Implementation</u>	<u>Comments</u>
NMSS Project Manager	NRC Project Manager – Reactor Decommissioning Branch	Serves as NRC Lead and Project Point of Contact for all MOU/IA issues with Naval Reactors Counterpart
Regional Office Inspection Management	Regional Office Management Responsible for Decommissioning Program	Manages the inspection implementation per NRC policy and procedures
NRC Inspector	NRC Inspector	Assigned by Region Office
IMC 2565, Regional Inspection Activities for the Naval Reactors Surface Ship Support Barge	Implements the NRC/Naval Reactors MOU and defines IMC 2561 to perform inspections	Provides for overall direction for implementing the IA and communications with Naval Reactors
IMC 2561, Reactor Decommissioning Inspection Program	IMC 2561 and applicable inspection procedures to be followed	PM and regional staff determine inspection scope and schedules based on risk significant activities
IMC 2545, Research and Test Reactor Inspection Program	IMC 2545 and applicable inspection procedures to use as applicable	PM and regional staff determine inspection scope and schedules based on risk significant activities
Licensee	Ships are non-licensed facilities, but Naval Reactors has contracted a company to decommission the ship in accordance with NRC regulations. Naval Reactors will oversee and project manage the contract and contractor activities. Naval Reactors is contractually bound to neither add nor subtract from any NRC recommended actions.	Naval Reactors will provide licensing basis documents: design, drawings, safety reports, etc. Naval Reactors and contractor will comply with NRC requirements for decommissioning and applicable regulations (10 CFR 20, etc.)
Decommissioning Plan or LTP	Contractor will submit Decommissioning Work Plan (DWP) and implementation procedures for NRC review and comment to Naval Reactors	Naval Reactors will approve the DWP and procedures that will serve as the DP/LTP compliance documents, based on NRC and their own evaluation
Project Management Communications	NRC PM and inspector will conduct periodic communications with Naval Reactors on planned activities	Naval Reactors PM will provide schedules and plans for NRC to plan inspections and site visits.

<u>SSSB Decommissioning Aspect</u>	<u>MOU/IA Implementation</u>	<u>Comments</u>
Inspection Plans (IPs)	NRC PM will review IPs and Regional Management will approve	IPs should be communicated to Naval Reactors in advance of scheduled inspection or visit.
<p>Inspection Communications</p> <p>Note: At all times, NRC personnel have the authority to issue STOP WORK orders if unsafe work practices are observed.</p>	Inspectors will hold formal entrance and exit meetings and will provide daily observations to Naval Reactors POC. NRC observations and potential violations will be used by Naval Reactors to determine contractor performance, private meetings with Naval Reactors management held to ensure understanding of any issues	Naval Reactors will determine if contractor management will attend NRC entrance and exit meetings.
Inspection Reports (IRs)	IRs will be issued and approved by Region Management. Observations, deviations, and non-compliances will be documented per NRC enforcement policy but will not require a follow up response by Naval Reactors. IRs will be communicated to Naval Reactors via telecon to ensure understanding of the issues and corrective actions that should be taken.	<p>Naval Reactors will communicate observations to the contractor and direct corrective actions.</p> <p>Naval Reactors will use the information to support contract performance.</p>
Corrective Actions and Observation Follow Up	Inspectors shall follow up to ensure corrective actions have been taken for reporting to Naval Reactors for effectiveness. Repetitive or serious compliance issues are to be managed by NRC management from NMSS and Region. Violations will not be reviewed by the Office of Enforcement, but the guidance for issuing escalated enforcement is to be followed.	Naval Reactors will ensure corrective actions are taken to comply with requirements.

<u>SSSB Decommissioning Aspect</u>	<u>MOU/IA Implementation</u>	<u>Comments</u>
In-process and Close Out Inspections	Inspectors will coordinate final inspections and surveys with the Project Manager. Samples taken by inspectors will be coordinated with the PM and COR for processing by RESL. Confirmatory surveys requested to be performed by ORAU will be coordinated with the PM and ORAU COR for issuance and approval of the RFTA for services.	The NRC and Naval Reactors MOU allow for the use of contracted services, such as RESL and ORAU.
Completion of the Radiological Decommissioning Project	Inspector will issue final inspection report and PM will issue Technical Evaluation Report with letter terminating the NRC's involvement with the SSSB decommissioning	Naval Reactors will advise the contractor of completion of radiological decommissioning and NRC oversight and inspections of the project
Other issues not found in this table	To be provided to the NRC PM for resolution by NRC Management and Naval Reactors	Issues identified outside of the MOU with Naval Reactors will need to be resolved.

Revision History for IMC 2565

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
N/A	ML20212L408 08/28/20 CN 20-040	Initial issuance. The IMC was created to provide technical support of the decommissioning of one of the non-combatant vessels, the Surface Ship Support Barge.	N/A	ML20212L409