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April 5, 2000

Docket No. 50-160

United States Nuclear Regulatory Commission  
11555 Rockville Pike  
Rockville, MD 20852-2738

Attention: Mr. Marvin M. Mendonca, Senior Project Manager  
Non-Power Reactors and Decommissioning Project Directorate  
Division of Reactor Program Management  
Office of Nuclear Reactor Regulation

Subject: Confirmation of Process to Adopt NRC Policy Issue, SECY-94-145 and  
Subsequent Guidance on Removable Levels of Tritium and Iron-55

References: 1. NRC Policy Issue, SECY-94-145, Increase of Tritium and Iron-55  
Unrestricted Use Limits for Surface Contamination at Shoreham and  
Fort St. Vrain  
2. Georgia Institute of Technology Research Reactor Decommissioning Plan  
3. 10 CFR 50.59

Dear Mr. Mendonca:

Pursuant to telephone conversations between your office and Georgia Tech these past two weeks, Georgia Tech has pursued the 10 CFR 50.59 process as the proper change method to adopt the NRC Policy Issue (ref 1) for the unrestricted release limits for tritium and iron-55. The change addresses the final release standards of these hard-to-detect radioisotopes. The Georgia Tech Technical Safety Review Committee used the- 10 CFR 50.59 process to establish a 200,000 dpm/100 cm<sup>2</sup> total surface contamination limit and a 40,000 dpm/100 cm<sup>2</sup> removable for tritium and iron-55. The 10 CFR 50.59 evaluation did not highlight any unreviewed safety questions.

It is our understanding that the NRC Confirmatory Survey of the facility at the completion of decontaminating and decommissioning project will utilize our 10 CFR 50.59 evaluation as the basis for the execution of their confirmatory survey.

If our understanding is incorrect or if you need further clarification of our position, please let us know as soon as possible. We plan to provide our decision to the Decommissioning Contractor by the 17<sup>th</sup> of April. Thank you for your support in this important project.

Sincerely,

A handwritten signature in black ink, appearing to read "Nolan Hertel", written over a horizontal line.

Dr. Nolan Hertel

Georgia Institute of Technology

Director Neely Nuclear Research Center

Cc: Mr. Craig Bassett, USNRC

Jeff Bell, IT

Robert S. Eby, CH2M HILL

Georgia Tech Technical Safety Review Committee