

Safety Light Corporation
4150A Old Berwick Road
Bloomsburg, Pa. 17815
Phone: 570-784-4344
Fax: 570-784-1402
E-Mail: lharmon@safetylight.com

MS 16
Q-5

37-00030-08

Re: Docket No. 030-05982
Control No. 126748

George Pangburn
Director Division of Nuclear Materials Safety
United States Nuclear Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, Pennsylvania 19406-1415

Dear Mr. Pangburn:

The following is in response for your need of additional information stated in your letter dated September 28, 1999.

Response to Item 1

Safety Light Corporation is enclosing (2) copies of our updated Radiological Contingency Plan. The updates were minor changes such as typos on the original, updating phone numbers and updating to our current operating status. Please insert these pages into your current copy leaving all Appendix C contents intact such as the maps etc.

Response to Item 2

In Safety Light Corporation's letter to Betsy Ullrich dated March 8, 1994, in response to her letter dated February 15, 1994, requesting information for a license renewal, we believe that these check sources were distributed prior to 1969 by suppliers properly licensed to do so at that time, in quantities exempt from licensing at that time. Safety Light Corporation's Pennsylvania license No. Pa-0166 authorizes possession of 1 curie of Radium 226 in any form and 10 millicuries in sealed sources. Item 6. of our letter dated March 8, 1994 to Betsy Ullrich is included.

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Response to Item 3

The Tritium Processing Building is the only building not included in the remediation plan for License No. 37-00030-02. Referencing Table 1 on page 64133 of Federal Register Vol. 63, No. 222 dated November 18, 1998, we do not anticipate any cost associated with decommissioning that building. The equipment that is in the Processing Building that would have to be removed for disposal or decontamination is listed below.

1. Foil and Target Impregnation Hood with associated piping and pumps.
2. Measuring Box
3. Storage Box
4. Packing Box
5. Sink Hood
6. Scrubber Hood
7. Rotary II with associated piping and pumps
8. Wash Up Hood
9. 2 Ovens
10. Metal Cabinet
11. Cutting Box
12. Leak Detector
13. Exhaust Ductwork

All the above has tritium surface contamination in varying degrees. The total volume for the above is approximately 956 cubic feet.

The following is a breakdown of tritium contaminated equipment in the solid waste building.

1. (3) Metal Cabinets
2. Glove Box
3. Metal Shelves
4. (3) Metal Lockers
5. Old Compactor
6. Green Glove Box
7. (2) 30 gal. Drums of Sand
8. (3) Metal Tables
9. Hydraulic Compactor
10. Miscellaneous items estimated to fill an area 7' X 7' X 10'
11. Blue Cabinet with Drawers

The total volume for the above is approximately 775 cubic feet.

Since Safety Light Corporation has ongoing tritium operations, most of the items above are currently being used or could be put back into operation if changing conditions

dictated. Some of the items above might be able to be decontaminated while others might be able to be cut up to save on cubic feet. The price that we have quoted to us to dispose of waste in the solid waste building is \$4.50/ # for dry active waste. Assuming 41 pounds per cubic foot and an estimated total 1731 cubic feet, the cost for the disposal of the above would be approximately \$350,000 dollars including shipping and licensing.

Response to Item 4

The following is a description of solid waste currently stored at Safety Light Corporation including estimated curies and cubic feet and type of container the waste is currently in.

1. Foil and Target Waste
 - A. (7) Stainless Steel Canisters Welded, 20 5/8 inches long x 10 1/8 inches diameter, approximately 8 cubic feet, total activity 6,563 Curies (<1000 curies per canister)
 - B. (15) Jars, .5 cubic feet, 4584.5 Curies
2. Bagged Waste (paper towels, rubber gloves, etc.), Brown Paper Grocery Bags, 439 cubic feet, approximately 2 Curies
3. Scrubber Columns, 10 inch diameter x 20 inches long galvanized welded cans, (45) cans, approximately 42 cubic feet, total activity 2205 Curies
4. Tube Stubs, 2 gallon paint cans, est. 65 cans, approximately 18 cubic feet, .52 Curies
5. Empty Scintillation Vials, (2) 55 gallon drums and (8) 30 gallon drums, approximately 47 cubic feet, negligible curies
6. Non Compactable Waste (metal frames, etc.), approximately 168 cubic feet, 1.68 curies
7. Compressed Bagged Waste in 55 gallon and 30 gallon drums, approximately 1026 cubic feet
8. Aircraft Sign Waste, 82.6 listed curies, <.5 cubic feet
9. Leaking Tubes, 5 cans, 910.37 listed curies approximately 1 cubic foot
10. Broken Tubes, equivalent to 2 stub cans, .016 curies, <.5 cubic feet

If all of the above waste were shipped at one time, we estimate the total cost to be approximately \$750,000 dollars. If the shipment were broken up the cost would be considerably higher. There is currently a \$380.00 per curie surcharge, however you can

put as many curies that will fit on a shipment with a cap of \$152,000 per shipment for the curie surcharge.

Safety Light Corporation discusses Radwaste in Appendix F part 1.5 of our original license submittal. It describes the waste building and the amount of curies that we put into waste from 1994 until 1998. It was approximately 51 curies or about 13 curies per year. We also estimate that to be about 40 cubic feet. It should also be noted that we keep waste in the hoods in the Foil and Target area of the processing building. In an ongoing facility, although we are constantly thinking waste reduction because of the cost, the waste could vary greatly. If we manage to keep it in line where it was the last 4 years, then we estimate a cost of approximately \$12,000 per year. Since we generate such a low quantity of waste, we will analyze it at least once a year starting after we receive our new license and dispose of it at least once during every two year period. The two year period would begin 1/1/00 providing we receive our operating license. Since we do not have any control over the waste situation in the United States, I would like a caveat put in our license that only holds us to the above providing there is a waste disposal site open to us.

If you have any questions about the above please contact me.

Very Truly Yours,


Larry Harmon,
Plant Manager