



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I

475 ALLENDALE ROAD  
KING OF PRUSSIA, PENNSYLVANIA 19406

OCT 25 1988

Docket No. 030-20934

License No. 37-23341-01

Commonwealth of Pennsylvania  
Department of Environmental Resources  
ATTN: Mr. Thomas Gerusky, Director  
Bureau of Radiation Protection  
Post Office Box 2063  
Harrisburg, Pennsylvania 17120

Dear Mr. Gerusky:

The Department of Environmental Resources (DER) letter, dated August 22, 1988 signed by Ms. Margaret Reilly to John Kinneman of this office, requested written NRC authorization for the disposal of radioactively contaminated sludge from the Royersford, Pennsylvania Waste Water Treatment Facility by land application or landfill burial. Several policy and legal issues have been raised as a result of the Royersford situation. The policy issues are being referred to the NRC's Office of Nuclear Material Safety and Safeguards (NMSS) and the legal issues to the NRC's Office of General Counsel (OGC). Until guidance is developed for use in future applications, this letter addresses our views on this matter.

Our letter dated August 31, 1988 set forth the NRC position, with respect to the radioactivity content, on the disposal of the sludge by land application. Our letter stated that the NRC does not plan to exercise regulatory authority in this matter and that the NRC, based on a study performed by Oak Ridge Associated Universities (ORAU), does not object to land application as a method of disposal.

During the August 16, 1988 meeting that was held at the DER Regional Office at Norristown to discuss the Royersford sludge, we agreed to have ORAU prepare an evaluation of the radiological consequences of disposing of the sludge by landfill burial. ORAU is prepared to begin this study once the landfill designated to receive the sludge has been identified. Please provide us with the identity of a specific contact who can provide ORAU with details of the landfill construction so that the study can be initiated.

Enclosure

In the absence of a completed ORAU study for landfill disposal, Pennsylvania's determination regarding projected doses to the maximally exposed individual would be acceptable to the NRC. If the Commonwealth concluded that doses from landfill disposal are less than, or comparable to, disposal by land application, NRC would not object to landfill burial.

Sincerely,

  
William T. Russell  
Regional Administrator

cc:  
Public Document Room (PDR)  
Nuclear Safety Information Center (NSIC)  
Commonwealth of Pennsylvania

Borough of Royersford  
ATTN: Sophie Simon  
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Royersford, Pennsylvania 19468

Interstate Nuclear Service Corporation  
ATTN: Guy Wilson, Manager  
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295 Parker Street  
P.O. Box 201  
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Commonwealth of Pennsylvania  
Department of Environmental Resources  
ATTN: Dr. Ivna Shanbaky  
1875 New Hope Street  
Norristown, Pennsylvania 19401

Commonwealth of Pennsylvania  
Department of Environmental Resources  
Department of Radiation Protection  
ATTN: Margaret Reilly  
P. O. Box 2063  
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bcc:  
R. Cunningham, NMSS  
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