



RECEIVED
REGION 1

2002 JAN 28 PM 3: 46

P-5

United States Nuclear Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, Pennsylvania 19406-1415
Attention: Ron Bellamy

January 25, 2002

37-00030-02

37-00030-08

030-05980

030-05982

Re: Mail Control Nos. 128861 and 128944

Dear Mr. Bellamy:

I reviewed the data from ICF Consulting. I look at all these estimates as just that estimates. Safety Light Corporation's(SLC) estimate prepared by GTS Duratech made certain assumptions. ICF's estimate also made certain assumptions. From my limited knowledge of cleanup methodologies and cost, I cannot ascertain which one is closer to being the best guess. Duratech did not have any time to evaluate the ICF results compared to theirs. One of the persons responsible for the DCE at Duratech has left the company and the other one responsible is on the road on a job working 12 hours a day. Duratech wanted to be consistent in their approach so they did not mix the use of NRC guidelines with the resrad defaults. They are going to research why they used the tritium concentration in water that they used.

It is my opinion, that with the limited resources that SLC has available, it doesn't really matter whether the cost is \$30 million or \$100 million. When cleanup begins on any particular task, that task will go out for bid. Using both the Duratech DCE and the ICF DCE will frame the cost for the awarding of a contract. After that the job won't be completed until all the contamination both radiological and hazardous is cleaned up to acceptable limits whatever the cost is. Obviously, the amount of money required has to be more than the bid to cover unseen contingencies in either DCE once the demolition process begins.

In conclusion, it doesn't matter which DCE we use. I think that we should use the least restrictive DCGL's and GCL's from either of the DCE's that are agreeable to the NRC. Going through this exercise and spending this time now for something that might not happen for years to come just escapes me. In years to come, the limits and/or the methodologies may change in our favor, which makes the above mute unless I am not being informed of events outside of Safety Light Corporation that could escalate the cleanup. In such case, if it isn't done with SLC's money, does SLC have any say over which DCE is used or should we.

128861 / 128944

NMSS/RGNI MATERIALS-002



If you have any further questions, please feel free to contact me.

Very Truly Yours,

Larry Harmon,
Plant Manager