



UNITED STATES  
**NUCLEAR REGULATORY COMMISSION**  
REGION I  
475 ALLENDALE ROAD  
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

March 28, 2002

Docket No. 03005980  
Control No. 130955

License No. 37-00030-02

Larry Harmon  
Plant Manager  
Safety Light Corporation  
4150-A Old Berwick Road  
Bloomsburg, PA 17815

SUBJECT: SAFETY LIGHT CORPORATION, REQUEST FOR ADDITIONAL  
INFORMATION CONCERNING APPLICATION FOR AMENDMENT TO  
LICENSE, CONTROL NO. 130955

Dear Mr. Harmon:

This is in reference to your letter dated February 6, 2002, regarding the "Work Plan for Safety Light Corporation, Bloomsburg, PA, Radioactive Waste Repackaging" (hereafter, Work Plan), prepared by Solutient Technologies (ST), your contractor. This letter also refers to the telephone conference on March 6, 2002 among you, Norm Fritz, your Radiation Safety Officer, your contractors, and James Kottan and Marie Miller of my staff, and also Bryan Werner, participating for Pennsylvania Department of Environmental Protection (PADEP). During this conference call, we stated that we had initiated the review of the Work Plan as an amendment request to your Nuclear Regulatory Commission (NRC) License No. 37-00030-02, and that in order to continue our review, we needed additional information.

The telephone conference provided a better understanding of the proposed processes and methods that your contractors will be using to sort, characterize and repackage the waste that was removed from two underground silos under amendment 51 to your NRC license. We recognize that there is considerable uncertainty involved with this project, and note that the Work Plan also states that work will be controlled through the use of Radiation Work Permits (RWPs), which will be modified as experience is gained with the project. Nonetheless, we are requesting that the supporting plans and initiating RWP procedures be submitted for our review. Enclosure One lists the specific information we request.

Also, as discussed during the above conference call, and as outlined in NRC's letter to you dated July 27, 2001, the handling of the waste a second time must be completed safely and in accordance with the disposal sites' waste acceptance criteria in order to ensure prompt shipment and disposal. Although we note that your contract with ST does not address shipping of the waste, you should apply for the waste permits for the four waste disposal facilities identified in your Work Plan prior to the start of any sorting activities. In addition, because the Barnwell low-level radioactive waste disposal facility prescribes yearly access limits for non-compact state waste, we request that you describe your contingency plans to safely store any waste that might not be accepted at currently available waste disposal facilities.

L. Harmon  
Safety Light Corporation

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Since early February 2002, we have discussed your intention to prepare the waste sorting site at your facility in advance of an approved licensing action. We have no objection to you pouring a concrete pad, as described in the Work Plan. Further, we acknowledge your statements that any cost associated with site preparations is part of the contract that you have already entered into with Solutient Technologies.

As required by 10 CFR 2.790, a copy of this letter will be placed in the NRC Public Document Room and will be accessible from the NRC Web site at <http://www.nrc.gov/readingrm.html>.

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 130955. If you have any technical questions regarding this deficiency letter, please call Marie Miller at (610) 337-5205.

We request a reply from you within 30 calendar days from the date of this letter. Thank you for your continued cooperation.

Sincerely,

***Original signed by Ronald R. Bellamy***

Ronald R. Bellamy, Chief  
Decommissioning and Laboratory Branch  
Division of Nuclear Materials Safety

Enclosure:  
Request for Additional Information

cc:  
Norman Fritz, Radiation Safety Officer  
David J. Allard, PADEP  
James F. Kopenhaver, PADEP-Southcentral Region  
Sherri Minnick, EPA Region 3

L. Harmon  
Safety Light Corporation

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bcc:

J. Kinneman, RI  
J. Kottan, RI  
E. Pogue, NMSS  
S. Lewis, OGC

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DATE	3/28/2002		3/28/2002					

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**REQUEST FOR ADDITIONAL INFORMATION ON THE  
SAFETY LIGHT CORPORATION “WORK PLAN”**

Work Plan - Introduction Section

1. This section states that Solutient Technologies (ST) will perform all on-site work in accordance with the approved Health and Safety Plan and the Quality Assurance (QA) Plan. Please submit these two documents to NRC.
2. This section states that specific tasks or a description of the work will be provided in the ST Radioactive Work Permits, and that a project set will be provided upon approval of the Work Plan. Please provide a copy of the governing procedure for developing Radioactive Work Permits. Likewise, any project RWPs referenced in Section 4, when they are completed to control on-site work activities, should be available for review during pre-job inspections by NRC.

Section 2.0 Organizational Structure

3. This section identifies ST managers and staff that will be performing the on-site activities. During our telephone discussion, ST stated that experienced health physics technicians, analysts and supervisors with several years of experience and technical knowledge will be involved with this project. Please confirm the experience level for ST personnel who will be sorting, sampling, analyzing and supervising work activities onsite.

Also confirm the expected role of the oversight contractor with respect to approximate time spent in oversight activities onsite. In addition, describe how concerns or issues identified by the oversight contractor or by your organization will be addressed.

Section 5.0 Comprehensive Work Plan

4. Section 5.5 describes the processing of containers. Please indicate where containers will be stored after processing; and in particular, describe where high activity containers will be stored to ensure exposures will be maintained As Low As Reasonably Achievable (ALARA).
5. Section 5.6 refers to representative samples, pre-samples and composite samples. During our telephone discussion, ST also stated that samples will be taken from each container. Please describe in more detail how these sample results will be collectively used to profile each of the waste streams and how the individual container sample results will demonstrate the waste will be accepted at each of the waste disposal facilities.
6. Section 5.7 describes the five different waste streams expected during this project. Please clarify how other waste (i.e., liquids) will be processed or stored. Also please identify the exempt levels of materials that can be shipped to the Waste Control Specialists facility in Texas.

## Enclosure One

7. Section 5.9 describes final packaging and staging of containers and states that "2R container" waste will be presented to the QA contractor for review and approval prior to capping and the final layer of concrete. Please describe the criteria that the QA contractor will use to give final approval.
8. Section 6.0 addresses spill prevention of solid materials during processing. Some liquids will probably be encountered in the drums. Please indicate how these liquids will be handled to minimize personnel and area contamination should there be a spill.

### Section 8.0 Radiation Safety Plan

9. Section 8.3 states that representative monitoring will be performed with personal breathing zone (BZ) samplers. Please clarify under what conditions BZ samplers will be used. For example, will all personnel involved in (specify activities) wear a BZ, or will only one crew member wear a BZ during (specify activities), and any doses will be assigned to all those working in this area.

### Section 11.0 Waste Material Screening/Survey and Sampling

10. Section 11.1 states that the a dose vs distance conversion will be used to determine activity. Please provide this information or indicate where this information is located in the Work Plan.
11. Section 11.4 describes air sampling of the stack discharges. We understand from previous sampling records that radioactive effluents are not expected to exceed 10 percent of NRC limits. However, please indicate the expected surveillance sampling that will be done at this location to ensure effluents are adequately evaluated.

### Section 12.0 Quality Control

12. Verify that measurements using the onsite multi-channel analyzer system will be used for screening only and therefore not subject to an independent Quality Control program.