



Pennsylvania Department of Environmental Protection

Rachel Carson State Office Building

P.O. Box 8469

Harrisburg, PA 17105-8469

March 26, 2002

Bureau of Radiation Protection

(717) 787-2480

Fax: (717) 783-8965

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

Re: Safety Light Work Plan for Silo Wastes – PA License No. PA-0166

Reference: Letter from Director, PA Bureau of Land Recycling and Waste Management to Safety Light Corp., dated January 4, 2000

Dear Mr. Harmon:

The Pennsylvania Department of Environmental Protection (DEP) has reviewed the Work Plan for Radioactive Waste Repackaging for the Safety Light Corporation (SLC) Site silo waste material. This plan prepared by Solutient Technologies was dated February 2002, and was transmitted by your February 6, 2002 letter to the Department.

The Department continues to be very concerned that the present location of the numerous containers of uncharacterized silo waste is unsatisfactory and in violation of DEP regulations as previously stated in the referenced letter. Although the Department has repeatedly emphasized that the highest priority should be given to removal and proper disposal of this waste, we note that the subject plan narrowly addresses only the first steps necessary to accomplish the disposal (waste characterization, segregation and repackaging). We request that the subject work plan be expanded to include, as a minimum, obtaining appropriate burial site permits for disposal of each category of identified silo waste material. If it is not possible to include obtaining disposal permits in the subject work plan, we request you develop and submit your plan for obtaining the disposal permits and how you will coordinate this activity with those included in the work plan. We also request that within 30 days of the receipt of this letter, SLC provide a plan for offsite disposal of all of the removed silo waste.

It is the Department's intent to increase inspection activities at your site as the actions to implement the subject plan are initiated. We expect to inspect the facilities, training, and monitoring planned by your contractor, prior to the start of movement of any containers, and will continue inspections as the work proceeds. Please keep the Department apprised of your schedule by contacting Mr. Robert Maiers, Decommissioning Section Chief in my office. He may be reached at 717-783-8979.

In addition to the foregoing concerns the Department has detailed comments provided in the enclosure to this letter. Please provide the Work Plan after it is revised to resolve both PA DEP and

*Dm5521
Add: Larry Camper*



Mr. Larry Harmon

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NRC comments. If you have any questions, please contact Mr. Robert Maiers at the telephone number above.

Sincerely,



David J. Allard, CHP
Director
Bureau of Radiation Protection

Enclosure

cc: Robert J. Barkanic, ARRP
Larry Camper, NRC HQ
George Pangburn, NRC Region I
Marie Miller, NRC Region I
James Snyder, DEP
Dennis Matlock, EPA
Robert Maiers, DEP
James Kopenhaver, DEP, SCRO
Thomas Crowley, DEP, SCRO

PA DEP Comments on Safety Light Corp.
Feb. 2002 Work Plan for Silo Waste Repackaging

1. As a licensee of both PA and the NRC, SLC should modify the schedule in Appendix 10 to reflect the requirement for PA DEP approval of the Safety Light Work Plan, as well as NRC approval as presently shown.
2. SLC should provide an emergency response plan for actions that would be taken if there were a threat of river levels high enough to impact the SLC site, or a forecast of inclement weather that might affect the safety of the ongoing operations. This plan should include actions to be taken to ensure control of the radioactive material in the containers in their present location, and actions to be taken in the waste processing areas. Within 30 days of the receipt of this letter, SLC should advise when this contingency plan will be submitted for PA DEP review.
3. The design of the containment structure should ensure that containment integrity will be maintained if exposed to high winds or other potentially damaging weather phenomenon.
4. The Work Plan should indicate where the repackaged containers will be located prior to offsite shipment.
5. The Work Plan should specify the minimum number of samples that will be analyzed from each drum and B-25 box to ensure a representative indication of the contents of each container.
6. Since the processing area will be located near the former silo location, and residual contamination remains in this location, SLC should confirm that background radiation levels in the waste processing area will be low enough to ensure that meaningful measurements are made for the container waste materials. The statement made in Section 8.5 that: "If possible, (emphasis added) the background exposure rate will be measured before any waste is processed" is unacceptable. Background measurements should be a requirement.
7. The Work Plan indicates that a Health and Safety Plan, and a Quality Assurance Plan will be prepared, and copies available upon request. It is requested that copies of each plan be provided for PA DEP review.
8. Provision should be made for continuous monitoring of the work area for both radiological releases and hazardous materials when containers are being opened and their contents sorted.
9. The discharge limits and monitoring frequency for the exhaust through the HEPA filters should be specified.
10. Instead of using direct heating of the containers, consideration should be given to alternative methods of thawing frozen contents. Scheduling the work for warmer weather would eliminate the risk from direct heating of containers.

11. The design of the work area should include provision for control of any potential liquids that may be in the containers.
12. The procedure for processing the highest activity containers discussed in Section 5.5 should be provided for PA DEP review in advance of employing the procedure.
13. Section 11.1 refers to a dose vs. distance conversion for Ra-226, which follows. However, the information is missing from this section.
14. In Section 11.3 the frequency should be specified for the radiation surveys to confirm that the controlled area is acceptable.
15. In Section 12.1, the QC Manager for the project is identified and his function to independently review measurement systems used by project employees is discussed. However, in Section 11.2, this same individual is identified as the manager of the MCA system to be used for gamma spectroscopy analysis. This inconsistency should be resolved to maintain appropriate independence of the project QC function.