

February 25, 2003

Mr. Tom McLaughlin
Mail Stop T-7F27
U.S. Nuclear Regulatory Commission
Division of Waste Management
11555 Rockville Pike
Rockville, MD 20852

SUBJECT: LETTER REPORT—CONFIRMATORY SURVEY TRIP NO. 5 RESULTS

FOR BUILDING FOUNDATIONS AND FOOTERS AT THE MOLYCORP, INC., WASHINGTON FACILITY, WASHINGTON, PENNSYLVANIA

(DOCKET NO. 040-08778, RFTA NO. 03-002)

Dear Mr. McLaughlin:

The Molycorp, Inc., Washington Site is located in southwestern Pennsylvania on the outskirts of Washington County approximately 56 kilometers [km (35 miles)] southwest of Pittsburgh. The site consists of approximately 8 hectares [ha (20 acres)] which represents the fenced portion of the 24 ha parcel of land owned by Molycorp that lies entirely within Canton Township at 300 Caldwell Avenue, Washington, Pennsylvania. The site is bounded by two dedicated streets in Canton Township—Caldwell Avenue and Weirich Avenue. The site is also transversed by Chartiers Creek that flows south to north through the property. The property is served by the CSX Railroad via two lines that were formerly owned by Tylerdale Connecting Railroad Company and the Baltimore and Ohio Railroad (MACTEC 2002).

The facility was primarily used for the production of molybdenum products—the plant also produced ferro alloys such as ferrocolumbium and tungsten. The raw material for this ferrocolumbium operation, columbite ore, contained significant concentrations (1 to 1.5%) of natural thorium which required Molycorp to possess a U.S. Nuclear Regulatory Commission (NRC) Source Material License (SMB-1393, Docket No. 040-8778). Operations that used thorium-containing ores were discontinued around 1970—however; some of the thorium bearing slag was used as fill material over portions of the site (RSI 2001).

Molycorp's decontamination and decommissioning contractor, MACTEC, Inc. (MACTEC), has performed the decommissioning activities at the Washington Facility. These decommissioning activities have included the remediation of various buildings/structures and concrete pads and the demolition and removal of those buildings/structures and concrete pads after remediation activities. With the exception of the paved roadway areas, all other structures and concrete slabs have been demolished leaving only exposed soil areas. Those remediation activities were performed under the Decommissioning Plan for the Washington, Pennsylvania Facility which implements final status survey (FSS) guidance from draft NUREG/CR-5849 (RSI 1999 and NRC 1992a).

P O BOX 117, OAK RIDGE, TENNESSEE 37831-0117



The Environmental Survey and Site Assessment Program (ESSAP) of the Oak Ridge Institute for Science and Education (ORISE) performed confirmatory survey activities on the remaining building slabs, foundations and footers and on the Building 39 Shack at the Molycorp, Inc. Washington Facility in Washington, Pennsylvania during the periods of October 28 through 30 and November 18 through 20, 2002. Survey activities consisted of alpha, beta and gamma surface scans, total surface activity measurements and soil sampling. These activities were conducted in accordance with site-specific survey plans, submitted to and approved by the NRC, and the ORISE/ESSAP Survey Procedures, Quality Assurance, and Laboratory Procedures Manuals (ORISE 2002a and b, 2000 and 2002c and d). Specifically, ESSAP personnel performed confirmatory survey activities on the Building 2W East Concrete Ramp; the Acid Tank Retainer Wall; the Building 39 Shack; and the footers, slabs, and/or foundations of Buildings 14, 19, 21, 22, 23, 25, 26, 28, 33, 35, 36, 38, 39, and 42. ESSAP also performed confirmatory survey activities on the footers/slab/foundation of the Acid Tank Storage Pad, the Heat Exchanger Tank, and the Electrical Switch Yard. ESSAP also reviewed the electronic FSS data packages that were made available for most areas for which ESSAP performed confirmatory survey activities.

Alpha plus beta scan coverage for the Building 39 Shack was up to 10% of the interior and exterior walls. Gamma scan coverage for the foundations/footers/slabs was up to 75% of the exposed surfaces and/or building footprints; alpha plus beta scan coverage for the foundations/footers/slabs was up to 25% of the exposed surfaces. Scans were performed using gas proportional and NaI scintillation detectors coupled to ratemeters or ratemeter-scalers with audible indicators. Locations of elevated radiation were marked and identified for further investigation. The MACTEC site representative was notified of any findings that were inconsistent with the FSS data package results.

ESSAP personnel performed direct measurements for alpha and beta surface activity at a minimum of 10 locations for each area surveyed. Direct measurements were performed using gas proportional detectors coupled to ratemeter-scalers. Prior results from the site determined that smear samples, for determining removable gross alpha and gross beta activity levels, were not required. Figures for documenting measurement locations were not required since the majority of the materials were in piles and were to be removed from the site. Soil samples were collected at two locations.

The primary contaminants at the Molycorp facility are natural thorium with limited quantities of natural uranium. MACTEC used the more restrictive limits for thorium for surface activity release. The applicable NRC guidelines established for license termination or release for unrestricted use for surface contamination in effect for this site, are as follows (NRC 1987):

Natural Thorium

1,000 dpm/100 cm², averaged over a 1 m² area 3,000 dpm/100 cm², maximum in a 100 cm² area 200 dpm/100 cm², removable

Natural Uranium

 $5,000 \alpha \text{ dpm/}100 \text{ cm}^2$, averaged over a 1 m² area 15,000 $\alpha \text{ dpm/}100 \text{ cm}^2$, maximum in a 100 cm² area 1,000 $\alpha \text{ dpm/}100 \text{ cm}^2$, removable

Natural thorium emits both alpha and beta radiations, therefore, either alpha or beta activity may be measured for determining residual thorium surface activity. As interpreted by the NRC, the average 1,000 dpm/100 cm² and maximum 3,000 dpm/100 cm² guidelines should apply independently to both alpha and beta measurements for surface contamination involving natural thorium (NRC 1992b). ESSAP's experience has shown that beta measurements typically provide a more accurate evaluation of thorium contamination on structure surfaces due to problems inherent in measuring alpha contamination on rough, porous, and/or dirty surfaces. For the thorium series in secular equilibrium, the beta activity level corresponding to 1,000 alpha dpm/100 cm² is 670 beta dpm/100 cm². Therefore, a beta activity measurement that is greater than 670 dpm/100 cm² or 2,000 dpm/100 cm² would exceed the alpha average or maximum activity guideline for thorium, respectively.

Total surface activity levels for each building foundation/slab/footer are presented in Table 1; Building 39 Shack surface activity levels are presented in Table 2. The following summarizes the surface activity levels for each confirmatory survey area.

Survey results for the following surveyed areas did not indicate any areas of residual contamination above guidelines: Building 2W East Concrete Ramp, Building 33 Footer/Ramp, Building 36 Footer, Building 38 Slab, Acid Tank Storage Pad Footer and Slab, Heat Exchanger Tank Foundation, Electrical Switch Yard Slab, and the Acid Tank Retainer Wall. Surface activity for those areas ranged from -8 to 48 dpm/100 cm² for alpha and -390 to 650 dpm/100 cm² for beta.

Survey results for the following areas indicated several areas where residual contamination levels were slightly above the average but below the maximum guidelines for beta surface activity: Building 14 Slab/Footer, Building 19 Slab, Building 21/22 Footer, Building 23 Footer, Resurvey of Building 25 Slab, Building 26 Rubble, Building 28 Slab, Building 33 Footer (Additional Material), Building 35 Footer, Building 39 Slab, Building 42 Footer, and the Building 39 Shack. Surface activity for these areas ranged from -16 to 140 dpm/100 cm² for alpha and -690 to 1,900 dpm/100 cm² for beta.

Survey results for the following areas indicated several areas where residual contamination levels were above average and/or above maximum guidelines for beta surface activity: Building 22 Footer, Building 25 Footer, Building 26 Slab, and Building 26 Footer. Surface activity for these areas ranged from 0 to 150 dpm/100 cm² for alpha and -26 to 7,300 dpm/100 cm² for beta.

Two surface (0-15 cm) soil samples were collected—one each from the footprints of Buildings 25 and 26—from locations of elevated gamma radiation detected by surface scans. The radionuclide concentrations for these samples are presented in Table 3 and ranged as follows:

1.96 to 27.2 pCi/g for Th-228, 1.97 to 25.5 pCi/g for Th-232, 3.93 to 52.7 pCi/g for total thorium, 0.76 to 3.78 pCi/g for U-235, 9.0 to 46.0 pCi/g for U-238, and, 18.76 to 95.78 pCi/g for total uranium. When compared to typical background concentrations of 1 to 4 pCi/g for these radionuclides (ORISE 2003), these levels demonstrate that soil contamination is present on the surface of the soil just underneath and in contact with the building foundations for Buildings 25 and 26.

Based on the confirmatory survey results, it is ESSAP's opinion that alpha and/or beta activity, in excess of the guidelines, remains on various pieces of concrete within several of the surveyed areas. The ESSAP confirmatory survey results do not support the licensee's conclusion that all surveyed areas, as described in the licensee's FSS reports for those areas, meet the unrestricted release criteria. For the areas that did not meet the release criteria, MACTEC site personnel stated that they were going to resurvey and/or segregate the material and consider it as radiological waste and dispose of it accordingly.

If you have any questions, please direct them to me at (865) 576-0065 or Tim Vitkus at (865) 576-5073.

Sincerely,

Wade C. Adams

Project Leader/Health Physicist Environmental Survey and

Site Assessment Program

WCA:ar

Enclosure

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TABLE 1

Location	Total Alpha Activity (dpm/100 cm²)	Total Beta Activity (dpm/100 cm ²)
Building 2W East Concrete		
1	0	-260
2	a	-110
3		-68
4		-230
5		-68
6		34
7		-11
8		-200
9		-180
10		-76
11		240
12		-83
13		-38
14		-72
15	16	310
Building 14 Slab/Footer		
1	48	680 ^b
2		1,000 ^b
3		1,200 b
4		1,100 b
5		1,200 ^b
6		820 b
7		770 ^b

Location	Total Alpha Activity (dpm/100 cm²)	Total Beta Activity (dpm/100 cm ²)
Building 14 Slab/Footer (co		
8		-34
9		570 ^b
10	79	230
11		220
12		-87
13		1,500 ^b
14		-30
15		1,900 ^b
Building 19 Slab		
1	8	-110
2		410
3		110
4		-87
5		19
6		220
7		180
8		200
9		270
10		-30
11	48	220
12		49
13		280

Location	Total Alpha Activity (dpm/100 cm²)	Total Beta Activity (dpm/100 cm²)
Building 19 Slab (continued	1)	
14		360
15	40	11
Building 19 Slab (second su	rvey)	
1	63	30
2		300
3		240
4		120
5		160
6		720
7		330
8		480
9		200
10		420
11		260
12	32	220
Building 21/22 Footer		
1		480
2		540
3		620 ^b
4		79
5		570
6		610
7		1,200 ^b

(dpm/100 cm²) 420 130 160 510 300 3,500 b 480 310
130 160 510 300 3,500 ^b 480
160 510 300 3,500 ^b 480
510 300 3,500 ^b 480
300 3,500 ^b 480
300 3,500 ^b 480
3,500 ^b 480
480
310
1,700 b
6,800 b
45
620
1,300 b
750 b
230
680 ^b
180
8
570
540
220

Location	Total Alpha Activity (dpm/100 cm²)	Total Beta Activity (dpm/100 cm²)
Building 23 Footer (continu		
4		600 b
5		-60
6		310
7		430
8		-110
9		-19
10		940 ^b
11	12	-60
12		160
13		-23
14		510
15		170
Building 25 Footer		
1		580 ^b
2		1,200 ^b
3		160 b
4	56	900 b
5		850 b
6	95	1,400 ^b
7		850 b
8	150	2,400 b
9	110	1,200 ^b
10		690 b

Location	Total Alpha Activity (dpm/100 cm²)	Total Beta Activity (dpm/100 cm²)
Building 25 Footer (continued)		
11		990 ^b
12		1,200 ^b
13		860 b
14	71	1,400 b
15		1,200 b
Resurvey of Building 25 Slab		
1	8	280
2		1,500 b
3		1,500 ^b
4		930 ^b
5		600
6		290
7	24	1,700 ^b
8		790 ^b
9		450
10	0	800 b
11		1,100 b
12		560 ^b
Building 26 Slab		
1	100	3,400 ^b
2		870 ^b
3	<u></u>	2,000 ^b
4		700 ^b

Location	Total Alpha Activity (dpm/100 cm²)	Total Beta Activity (dpm/100 cm ²)
Building 26 Slab (continued		
5		7,300 ^b
6		2,000 b
7		1,500 ^b
8		190
9	63	460
10		770
11		370
12		280
13		240
14		560
15		350
16	24	510
Building 26 Footer		
1	63	1,500 b
2		2,300 b
3		2,900 b
4		-26
5		1,600 b
6		790 ^b
7		920 ^b
8		1,100 ^b
9		1,600 b
10	79	1,700 ^b

Location	Total Alpha Activity (dpm/100 cm²)	Total Beta Activity (dpm/100 cm²)
Building 26 Footer (continu		
11		1,800 ^b
12		2,500 b
13		1,000 ^b
14		1,800 b
Building 26 Rubble		
1	48	1,300 ^b
2		1,000
3		1,200
4		940
5		1,200
6	16	530
7		620
8		670
9		550
10		320
11		480
12		650
13		460
14		190
15		660

Location	Total Alpha Activity (dpm/100 cm²)	Total Beta Activity (dpm/100 cm²)
Building 28 Slab		
1	48	-420 ^b
2		580 ^b
3		860 ^b
4	3	-210
5		-110
6		38
7		520
8		560
9		140
10		420
11		-11
12		620
13		91
14		150
15		-34
16		45
17		530
18		83
19		190
20		1,100 ^b

Location	Total Alpha Activity (dpm/100 cm²)	Total Beta Activity (dpm/100 cm²)
Building 33 Footer/Ramp		
1	0	110
2		440
3		150
4		210
5		76
6		0
7		100
8		68
9		650 ^b
10		620 ^b
11		53
12	32	220
13		210
14		230
15		79
Building 33 Footer (Additi-	onal Material)	
1	16	190
2		110
3		72
4		850 b
5		1,400 ^b
6		-49
7		-38

Location	Total Alpha Activity (dpm/100 cm²)	Total Beta Activity (dpm/100 cm²)
Building 33 Footer (Addition	onal Material - continued)	
8		-87
9		-4
10	40	-42
Building 35 Footer		
1		-140
2		-57
3		270
4		-30
5		-690
6		-340
7		-440
8		-460
9		-220
10		920 ^b
11		570
12		950 ^b
13		870 ^b
Building 36 Footer	•	
1	32	-180
2		-94
3		170
4		-220
5		-220

Location	Total Alpha Activity (dpm/100 cm²)	Total Beta Activity (dpm/100 cm²)
Building 36 Footer (continu		
6		-53
7		-26
8		-150
9		-15
10		-200
11		-220
12	40	34
13		0
14		-87
15		79
Building 38 Slab		
1		200
2	32	-230
3		570
4	48	160
5		160
6		130
7		220
8		180
9		11
10		94
11		38
12		130

Location	Total Alpha Activity (dpm/100 cm²)	Total Beta Activity (dpm/100 cm ²)	
Building 38 Slab (continued			
13		-140	
14		91	
15		79	
Building 39 Slab			
1	95	170	
2		-300 b	
3		-160	
4		210	
5		110	
6		-8	
7		34	
8		240	
9		-83	
10	140	690 ^b	
11		900 ^b	
12		170 b	
13		-42	
14		250	
15		68	
Building 42 Footer	1		
1	40	-34	
2		-150	
3		-34	
4		-110	

Location	Total Alpha Activity (dpm/100 cm²)	Total Beta Activity (dpm/100 cm ²)	
Building 42 Footer (continu			
5		290	
6		-120	
7		130	
8		45	
9		-49	
10		760	
11	48	210	
12		120	
13		76	
14		1,100 b	
15		930 ^b	
Acid Tank Storage Pad Foo	oter	(all 1814)	
1	-8	-120	
2		-280	
3		-200	
4		-260	
5		-42	
6		-91	
7		-200	
8		-68	
9		-38	
10	***	-340	
11		-380	
12		-240	

Location	Total Alpha Activity (dpm/100 cm ²)	Total Beta Activity (dpm/100 cm²)	
Acid Tank Storage Pad Foo	eter (continued)		
13		-38	
14		-210	
15	8	-230	
Acid Tank Storage Pad Sla	b		
1	0	-110	
2		-190	
3		-49	
4		-170	
5		-270	
6		-64	
7		-100	
8		110	
9		-160	
10		-170	
11		-19	
12		-290	
13		-34	
14		110	
15	40	-120	
Heat Exchanger Tank Four	ıdation		
1	32	340	
2		45	
3		8	
4		380	

Location	Total Alpha Activity (dpm/100 cm²)	Total Beta Activity (dpm/100 cm²)	
Heat Exchanger Tank Four	ndation (continued)		
5		250	
6		-110	
7		-19	
8		-30	
9		23	
10	24	-19	
Electrical Switch Yard Slal	b		
1	8	-210	
2		-49	
3		-390	
4		68	
5		91	
6		180	
7		530	
8		60	
9		-130	
10		72	
11	32	390	
12		34	
13		130	
14		130	
15		-79	
16	16	180	

SURFACE ACTIVITY LEVELS FOUNDATIONS/SLABS/FOOTERS/RETAINING WALLS MOLYCORP, INC. WASHINGTON, PENNSYLVANIA

Location	Total Alpha Activity (dpm/100 cm²)	Total Beta Activity (dpm/100 cm²)	
Acid Tank Retainer Wall			
1	32	-230	
2		-300	
3		-150	
4		-360	
5		-160	
6	-	-190	
7		-300	
8		-230	
9		-220	
10		-190	
11		-370	
12		-250	
13	330		
14	16	-260	

^aMeasurement not performed.

Net Count Rate = (Surface Counts_{unshielded} - Surface Counts_{shielded}) - (BKG Counts_{unshielded} - BKG Counts_{shielded}).

^bDue to elevated ambient gamma radiation from contaminated soil and/or adjacent contaminated areas, these measurements were calculated by determining the difference between unshielded and shielded beta activity measurements with Net Count Rates determined as follows:

TABLE 2

SURFACE ACTIVITY LEVELS BUILDING 39 SHACK MOLYCORP, INC. WASHINGTON, PENNSYLVANIA

Location	Surface	Total Alpha Activity (dpm/100 cm²)	Total Beta Activity (dpm/100 cm²)	
1	Lower Wall	a	-15	
2	I-Beam		130	
3	I-Beam	-16	94	
4	Lower Wall		68	
5	Upper Wall		160	
6	Lower Wall		230	
7	Lower Wall		360	
8	Door		94	
9	- Floor 0		320	
10	Floor		-68	
11	Floor		98	
12	Door		-4	
13	Lower Wall		800	
14	Lower Wall		570	
15	Lower Wall		400	
16	Lower Wall		510	

^aMeasurement not performed.

TABLE 3

RADIONUCLIDE CONCENTRATIONS IN SOIL SAMPLES MOLYCORP, INC. WASHINGTON, PENNSYLVANIA

Location	Radionuclide Concentration (pCi/g)					
Location	Th-228	Th-232	Total Thorium ^a	U-235	U-238	Total Uranium ^b
Building 25	$1.96 \pm 0.15^{\circ}$	1.97 ± 0.26	3.93 ± 0.30	0.76 ± 0.23	9.0 ± 1.0	18.76 ± 2.01
Building 26	27.2 ± 1.7	25.5 ± 2.0	52.7 ± 2.6	3.78 ± 0.73	46.0 ± 4.0	95.78 ± 8.03

^aTotal thorium calculated by Th-228 + Th-232.
^bTotal uranium calculated by (2 x U-238) + U-235.
^cUncertainties represent the 95% confidence level, based on total propogated uncertainties.

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