

**ORISE**  
OAK RIDGE INSTITUTE FOR SCIENCE AND EDUCATION

June 3, 2003

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

**SUBJECT: ANALYTICAL RESULTS FOR SOIL SAMPLES FROM THE BUILDING 9 FOOTPRINT AT THE MOLYCORP, INC., YORK FACILITY, YORK, PENNSYLVANIA (DOCKET NO. 040-08794, RFTA NO. 03-007)**

Dear Mr. McLaughlin:

The Environmental Survey and Site Assessment Program (ESSAP) of the Oak Ridge Institute for Science and Education (ORISE) collected ten soil samples from the Building 9 Footprint area on April 29, 2003. These samples were collected from five locations and included a 0 to 1 meter (m) depth sample and a 1 to 2 m depth sample from each location. ESSAP personnel chose the locations and used the on-site Geoprobe® to collect the samples. The use of the Geoprobe® was a deviation from the ORISE Survey Procedures Manual; this deviation was documented in the site log book and was approved by the NRC site representative (ORISE 2003a). Two additional soil samples, previously collected by the Pennsylvania Department of Environmental Protection (PADEP) site representative, were also provided to ESSAP for analyses.

The primary contaminants at the MolyCorp facility are natural thorium and radium with limited quantities of natural uranium. The site-specific soil guidelines, as presented in the York Facility Decommissioning Plan, are as follows (RSI 2000 and NRC 1981 and 1983):

<u>Radionuclide</u>	<u>Soil Concentration Above Background (pCi/g)</u>
Natural uranium	10
Total thorium	10
Radium-226	5
Excess uranium	30
Excess Th-230	14.3

In order to confirm compliance with the release criteria, the unity rule was used to determine that the sum of each radionuclide divided by its site release criteria is less than or equal to one. ESSAP used the same "sum-of-fractions" calculation method as provided by the licensee (MACTEC 2003).

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

Operated by Oak Ridge Associated Universities for the U.S. Department of Energy



Mr. Tom McLaughlin

-2-

June 3, 2003

The samples were analyzed by gamma spectroscopy (Procedure CP1, Revision 12) to determine the presence and concentration of natural uranium, total thorium, and radium-226, if present, in the samples (ORISE 2003b). The ESSAP analytical results support the licensee's conclusion that the soil pile that was placed in the Building 9 Foundation met the site's unrestricted release criteria.

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

Enclosures

cc: G. Purdy, NRC/NMSS/TWFN 7F27  
E. Knox-Davin, NRC/NMSS/TWFN 8A23  
C. Gordon, NRC/Region I  
E. Abelquist, ORISE/ESSAP  
T. Vitkus, ORISE/ESSAP  
D. Condra, ORISE/ESSAP  
D. Herrera, ORISE/ESSAP  
File/850

Distribution approval and concurrence:	Initials	Date
Technical Management Team Member	TQV	6/3/2003
Quality Manager	CTP	6/3/03
Laboratory Manager	RDC	6/3/2003

ORISE TABLE 1

**RADIONUCLIDE CONCENTRATIONS IN SOIL SAMPLES  
BUILDING 9 FOOTPRINT  
MOLYCORP, INC.  
YORK, PENNSYLVANIA**

Sample Number	Sample Location <sup>a</sup>	Depth (m)	Radionuclide Concentrations (pCi/g)									
			U-238	U-235	Ra-226	Total U <sup>b</sup>	Excess U <sup>c</sup>	Excess Ra <sup>d</sup>	Th-232	Th-228	Total Th <sup>e</sup>	SOF <sup>f</sup>
850S001	Scoop # 46	---	3.05 ± 0.80 <sup>h</sup>	0.13 ± 0.13	2.01 ± 0.16	6.23	1.05	-1.05	2.29 ± 0.29	2.23 ± 0.16	4.51	0.73
850S002	Scoop # 32	---	2.64 ± 0.98	0.19 ± 0.15	2.91 ± 0.26	5.46	-0.27	0.27	1.73 ± 0.28	1.74 ± 0.14	3.47	0.45
850S003	A8, B	0-1	2.51 ± 0.66	0.23 ± 0.12	2.33 ± 0.20	5.25	0.17	-0.17	1.98 ± 0.25	2.09 ± 0.15	4.07	0.44
850S004	A8, B	1-2	1.51 ± 0.65	0.14 ± 0.14	1.32 ± 0.13	3.16	0.19	-0.19	1.84 ± 0.23	1.66 ± 0.12	3.50	0.22
850S005	A11, B	0-1	1.54 ± 0.61	0.07 ± 0.11	1.87 ± 0.17	3.15	-0.33	0.33	1.67 ± 0.22	1.68 ± 0.13	3.35	0.23
850S006	A11, B	1-2	1.82 ± 1.09	0.23 ± 0.14	1.43 ± 0.16	3.87	0.39	-0.39	1.78 ± 0.28	1.74 ± 0.14	3.52	0.29
850S007	A13, D	0-1	1.64 ± 0.56	0.04 ± 0.10	1.82 ± 0.16	3.33	-0.18	0.18	1.74 ± 0.22	1.67 ± 0.12	3.40	0.23
850S008	A13, D	1-2	1.31 ± 0.73	0.06 ± 0.14	1.49 ± 0.16	2.68	-0.18	0.18	1.90 ± 0.28	1.76 ± 0.14	3.66	0.20
850S009	A15, D	0-1	1.93 ± 0.84	0.18 ± 0.23	1.89 ± 0.19	4.04	0.03	-0.03	1.57 ± 0.27	1.72 ± 0.14	3.29	0.22
850S010	A15, D	1-2	1.40 ± 0.79	0.20 ± 0.18	1.61 ± 0.16	2.99	-0.21	0.21	1.91 ± 0.28	1.82 ± 0.14	3.73	0.22
850S011	D14, D	0-1	2.40 ± 0.77	0.16 ± 0.12	2.39 ± 0.21	4.97	0.02	-0.02	1.90 ± 0.24	1.85 ± 0.14	3.76	0.38
850S012	D14, D	1-2	3.07 ± 0.98	0.02 ± 0.13	1.90 ± 0.19	6.15	1.17	-1.17	1.82 ± 0.27	1.84 ± 0.15	3.66	0.66

<sup>a</sup>Scoop samples collected by PADEP; ESSAP collected samples at the grid locations as marked by MACTEC.

<sup>b</sup>Total U calculated by doubling the U-238 and adding the U-235 concentrations.

<sup>c</sup>Excess U calculated by the subtracting the Ra-226 from the U-238 concentration.

<sup>d</sup>Excess Ra calculated by the subtracting the U-238 from the Ra-226 concentration.

<sup>e</sup>Total Th calculated by adding the Th-228 and Th-232 concentrations.

<sup>f</sup>SOF calculated per MACTEC "Technical Basis Document: Derivation and Application of the 'Sum-of-Fractions' Calculation", MolyCorp's York, PA Site; February 2003.

<sup>g</sup>Depth not measured.

<sup>h</sup>Uncertainties represent the 95% confidence level, based on total propagated uncertainties.

## **REFERENCES**

MACTEC Development Corporation (MACTEC). Technical Basis Document: Derivation and Application of the "Sum-of-Fractions" Calculation, Molycorp's York, PA Site Soils Remediation Project. Grand Junction, CO; February 2003.

Oak Ridge Institute for Science and Education (ORISE). Survey Procedures Manual for the Environmental Survey and Site Assessment Program. Oak Ridge, Tennessee; February 2003a.

Oak Ridge Institute for Science and Education. Laboratory Procedures Manual for the Environmental Survey and Site Assessment Program. Oak Ridge, Tennessee; January 2003b.

Radiological Services, Inc (RSI). Final Status Survey Report for Decommissioning the Molycorp, Inc. York, Pennsylvania Facility. New London, Connecticut; December 2000.

U.S. Nuclear Regulatory Commission (NRC). "Disposal or Onsite Storage of Thorium and Uranium Wastes from Past Operations," 46 CFR 52061, Washington, DC; October 23, 1981.

U.S. Nuclear Regulatory Commission. Policy and Guideline Directive FC83-23, Termination of Byproduct, Source, and Special Nuclear Material Licenses. R.E. Cunningham to Regional Administrators, Branch Chiefs and Division of Fuel Cycle and Materials Safety. Washington, DC; November 4, 1983.