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Date: January 18, 2005

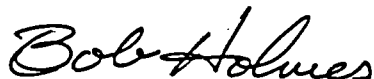
To: Saxton Citizens Task Force Members

From: Robert D. Holmes, SNEC Oversight Committee Secretary

Subject: SNEC Oversight Committee Meeting/Citizens Task Force Meeting

On Wednesday December 15, 2004 the SNEC Oversight Committee Meeting was held at the SNEC Facility site at 9:00 am. The Saxton Citizens Task Force Meeting was held in conjunction with this meeting. Please find attached the minutes from that meeting.

Tentatively, the next meeting of the SNEC Oversight Committee will be held in Saxton on April 26, 2005. The meeting may be held in the evening to facilitate attendance. A location has not been set as of this date. I will confirm the date, time and location once known.

A handwritten signature in cursive script that reads "Bob Holmes".

Sincerely, Bob Holmes

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**SNEC Oversight Committee
Meeting Minutes
SNEC Meeting No. 14
December 15, 2004**

The fourteenth meeting of the SNEC Oversight Committee was held on December 15, 2004 in the SNEC Conference Trailer. The following were in attendance at the meeting:

Committee Members:

Dr. Thomas Gerber - Chairman
Mr. James Hildebrand- member
Mr. Thomas Nauman- member
Mr. Steven White- member
Mr. James Byrne - Committee technical coordinator

Guests:

Mr. Ralph L. Hansen – Manager, Fleet Oversight, FENOC
Mr. Robert D. Holmes - Committee recorder
Mr. Rodger Granlund – SNEC Independent Inspector
Mr. James Fockler – Chairman, Saxton Citizens Task Force (CTF)
Mrs. Bunny Barker – Member, Saxton CTF
Mr. Tom Black - Member, Saxton CTF
Mr. Jim Keifer – Aide to Pa. Representative Richard Hess
Mr. Ernest Fuller – Local citizen
Local Press (3)

Presenters:

Lou Shamenek
Art Paynter
Robert Holmes

Introductory Business:

Chairman Gerber called the meeting to order at 9:00 a.m. The minutes of the previous Committee meeting were approved, and members and guests were asked if they had any additional items that they would like to have added to the agenda. There were no further additions for the agenda.

Project Overview – Lou Shamenek

Mr. Shamenek reviewed the current project status with the Committee.

Budget Status and Funding Projections

Mr. Shamenek discussed the SNEC project budget request that was made in October 2004. The previous budget was \$3.4 million for 2004 and that was intended to cover the project until completion at the end of 2004. A request was made to First Energy Corp. in Akron for an additional \$3.5 million that was necessary to complete the project. Completion is now projected for mid-2005, physical work to be complete by June 2005 and the Final Status Survey Report submitted to the NRC by the end of June 2005. This request was approved and the total budget is \$6.95 million for all of 2004 through project completion in June 2005.

Given the underlying assumptions in the budget request, Mr. Shamenek said this amount is sufficient to complete the project, however there is no contingency built into the budget. Any developments outside the currently projected extent of contamination will be outside the budget forecast. Mr. Shamenek listed three areas as "at risk". These are; the Shonka Research Associates (SRA) survey conveyor activity, the material crusher to support the conveyor survey and the additional soil that may need to be disposed of as radioactive waste from the CV east yard remediation.

The original projection used for the most recently revised budget was that approximately 8,000 tons of soil would need to be processed through the SRA conveyor but the actual may be double that amount. The budget also projected the soil disposal cost at \$610,000, to date SNEC has spent \$530,000 and there is additional soil to dispose of.

The total project expenditures since the early 1980s are projected to be ~\$76 million.

Overall Project Schedule and Status

Mr. Shamenek reviewed the project schedule. He reported that the schedule as presented to FENOC, now has Final Status Surveys (FSS) completing in May 2005. The FSS report will be submitted June 2005 with the license termination to follow. This is about a six-month delay in the original schedule and is due principally to the remediation required in the northeast quadrant and CV east yard.

The Committee asked what the "critical path" is at this time. Mr. Shamenek said the SRA conveyor survey and the CV east yard remediation are critical path at this time.

Organization/Staffing

There have been no changes in the site organization since the last meeting. There are six FENOC employees on the project and 39 persons total on-site. This includes sixteen (16) Bartlett RadCon Technicians eight (8) Washington Group workers and six (6) FENOC personnel. The project continues to experience difficulty maintaining continuity with contractor radiological controls technicians due to other plant's outage demands.

Mr. Paynter added that Mr. Donnachie has left to take a position with Homeland Security and a contractor has been brought onboard to replace him. Mr. Dave Lovett from Millennium Services

will be writing the FSS reports. He has experience at Oak Ridge, Savannah River and with the MARSSIM process.

Mr. Shamenek said that the project continues to receive good support from FirstEnergy.

Site Overview (Remaining Work, Issues, Area Classification, Timing) - Art Paynter

CV Yard Area

There are 45 grids (all grids are 10 meters X 10 meters) in the CV yard area to be checked. The original plan was to strip the grids in six-inch (6") layers and scan the new surface each time. Records from the 1994 Soil Removal Project indicated there were four to six grids remaining with subsurface contamination that might require remediation. After the first few layers were removed however, portions of the old Filled Drum Storage Bunker (FDSB) floor were uncovered. These were contaminated and required remediation. While remediating this area, a backfilled trench containing a service water line installed in the mid-1980s was uncovered. The backfill was contaminated and this too required extensive remediation. Because of safety concerns and the need to drive equipment over this trench, it will be Final Status Surveyed and backfilled as soon as possible.

Mr. Paynter reviewed the scanning technique used in these areas. The Committee asked if there was a "count per minute to pCi/gm" conversion developed to perform the scans. Mr. Paynter said yes and provided several examples.

The Committee inquired as to the levels capable of being detected and hence remediated using the scan technique. Mr. Paynter said the applicable Derived Concentration Guideline Level (DCGL) for Cs-137 in soils is about 6.6 pCi/gm. The SNEC process reduces that "limit" to <75% or about 4.9 pCi/gm (SNEC administrative limit). The scanning process can reliably detect about 3 pCi/gm in soil near the surface. Cs-137 is used as a surrogate nuclide as others are more difficult to detect such as Sr-90 which has a DCGL of about 1.2 pCi/gm.

It now appears that the underground storage tank area was also backfilled with contaminated materials and will require excavation and survey. This area once contained the decon water storage tank, two liquid radioactive waste storage tanks and three gas decay hold-up tanks. The tanks were all removed in 1974. It is likely that the excavation will extend as deep as 24 feet and could encompass three to four grids. The excavated material will be surveyed through the SRA conveyor process. In order to handle the excavated material it was necessary to construct several settling ponds and a water processing system.

Mr. Shamenek said they have been working on the excavation for three weeks and he felt it would take several more to complete. Mr. Paynter noted this would be a difficult area to perform FSS in. He reviewed the possible use of several "remote scanning" techniques to perform FSS of this area. One of the challenges in this area will be the modeling of background radiation due to the geometry. The survey plan does not involve the entry by personnel into the excavation for safety reasons.

The Committee asked Mr. Shamenek what makes the CV yard area "at risk" in terms of schedule and budget. He said the unknown volume and extent of excavation.

The Committee asked about the groundwater monitoring program. Mr. Paynter said the program continues to monitor the groundwater via the Radiological Environmental Monitoring Program (REMP). He said the REMP program has not detected any positive activity in the wells for several years. He noted some wells have been deactivated and removed.

The Committee asked if, when the project is complete, there would be an overall dose number calculated for what ever is remaining. Mr. Paynter said no, the conclusion as required by the regulation is that the site will be less than 25 mrem/year. He added that by using the 75% SNEC administrative limit with the DCGLs and NRC default levels for building surfaces, the requirement to employ and demonstrate the use of ALARA is being met. The Committee asked if the use of the 75% administrative limit is in the SNEC License Termination Plan (LTP) making it a requirement. Mr. Paynter said it is in the LTP.

There was considerable discussion over the actual exposure and it was the consensus of the Committee that the site will be released to a fraction of the actual limit due to the nature of remediation activities and the levels of conservatism being used. In many cases remediation is carried out to near or even below background radiation levels.

Open Land Areas

Northeast Open Land Areas

Old Dump

Mr. Paynter and Mr. Shamenek reviewed the status of this area. 37 grids have been cleared and remediation is considered complete. Post remediation surveys are in progress with two grids remaining to survey. Mr. Shamenek reviewed the methodology used to prepare this area for survey. Several grids were scrapped down to original grade, removing the 3' - 6' of fly ash and debris. These were then surveyed; the remaining grids were leveled and prepared such that no more than about three feet of fly ash and debris remained over the original grade and to provide a flat surface to facilitate surveys. Subsurface sampling in addition to scans are being performed of these grids. This approach prevented the generation of thousands of tons of overburden that would have required surveying to remain in place.

Mr. Paynter then reviewed the characterization process for this complex area. The contamination was discovered in the zone between the old deposited fly ash and additional debris and fly ash that was later placed on top that formed many moguls. The remediation efforts appear successful based on the post remediation survey results.

The Committee asked if the staff had completed moving dirt and debris in the dump area and if remediation is complete. Mr. Paynter said yes and added that the NRC can be expected to perform an in-process inspection or survey of the FSS of the dump.

Lower Plateau

Subsurface sampling is in-progress in this area to be followed by scans. No further remediation is anticipated. Mr. Paynter reviewed the characterization effort in the lower plateau that was driven by the evidence that contaminated material is linked to the proximity of roads in this area.

Upper Plateau

The six Class 1 grids near the river are remediated and all remediation in the upper plateau is complete, as are post remediation surveys. The area will be placed in Post Remediation Isolation (PRI) at a later date so FSS can be performed.

The asbestos dump in this area was removed. This required 22 grids to be scraped to original grade generating about 8,000 tons of overburden material that will be surveyed through the SRA conveyor process. Subsurface sampling is in progress to ensure remediation is complete. Post remediation surveys in this area are about 90% complete Mr. Paynter said.

The Committee asked about what involvement the Army Corps of Engineers (ACOE) has had with the work in these areas. Mr. Shamenek related the two site visits and area walk-downs performed with the ACOE representatives. The ACOE has established restoration requirements for their property. Mr. Shamenek said the ACOE would make a follow-up visit to check on compliance.

BB Area

The so-called "BB area" is the area along the "BB" east-west grid line outside the Westinghouse area fence. Mr. Paynter said this was an area previously remediated on several occasions in the 1980s and possibly the 1990s. The contamination was discovered under a layer of "clean fill" from 12" – 24" deep apparently placed on top of the fly ash in 1979 or 1980 to contain the fly ash. Additional work to complete remediation is required in this area.

Switchyard Area

Mr. Paynter said the Penelec switchyard is being characterized. Penelec had placed new stone in the switchyard; this complicates the process as the original surface must be scanned. No remediation of this area is expected.

Line Shack

The Penelec line shack FSS is complete. The FSS report has been submitted and accepted.

Burn Area

The "old burn" area had been previously remediated and no further work is expected there. Another area east of this site where materials also had been burned during plant operation was found to be contaminated. Remediation is in progress in this area and should involve several grids.

The Committee asked if these new discoveries were included in the current budget. Mr. Shamenek said they were.

Miscellaneous Areas

Mr. Paynter reviewed the status of other areas where FSS is complete. These include: The Saxton Steam Generating Station (SSGS) which has been backfilled. The SSGS FSS report is in progress and should be completed in February 2005. The footprint of the Containment Vessel (CV) which was backfilled and capped with concrete. The CV FSS report is in progress and should be completed in March 2005.

The Committee asked if the NRC performed any confirmation surveys. Mr. Paynter said the CV lower shell was surveyed by ORISE as an "in-process inspection" before backfilling. The CV shell is a closed issue with the NRC according to Mr. Paynter. The Committee asked how the NRC closes these areas out from a regulatory perspective. Mr. Paynter said they are closed through a formal NRC inspection and documented in the NRC inspection report.

Mr. Paynter reviewed the SRA drive over open land survey that uncovered the existence of the contaminated open land areas. The five elevated areas were the ones that have required remediation. He reviewed the basis for the "old dump" initial classification as a Class 3 area. He said there has been nearly 1,000 grids scanned and sampled as part of the expanded characterization as a result of these findings. The Committee asked if the characterization is complete. Mr. Paynter said no and he reviewed the remaining areas, mostly in the northwest.

Classification Changes

Mr. Paynter reviewed the proposed changes to the MARSSIM Impacted Area classifications using a draft site map. The Class 2 and 3 areas have not changed much but the Class 1 areas have expanded due to the remediation in outlying areas of the site.

The Committee asked if there was any potential for anything to change on the draft classification map. Mr. Paynter said the area to the northwest above the "birdseye" was still being characterized and the Class 2 area could expand there. Additionally, he said the LSA box storage area north of the restroom trailer could become a Class 1 area.

Mr. Paynter said he is in frequent communication with ORISE and the NRC to keep them apprised of the status and they are expected to visit the site to review the "old dump" and CV yard FSS.

The Committee asked if there were any open technical issues with the LTP. Mr. Paynter said they were all resolved and there are no open issues at this time. There is an open technical issue with the manner in which laboratory analysis minimum detectable activity (MDA) is reported. Mr. Paynter is working with the NRC and ORISE to resolve the issue.

The Committee summarized the overall process to clarify that an area is not considered remediated or "clean" until the final post remediation survey verifies this. Mr. Paynter and Mr. Shamenek said that is correct.

The Committee asked about the precise definition of "clean" for an area that has been remediated. Does this mean less than the DCGL? As Mr. Paynter explained, it actually means much less than the DCGL. The limit for Cs-137 in soil as an example is about 6.6 pCi/gm. This is then lowered to the SNEC administrative limit (75% of the DCGL) or 4.9 pCi/gm. Most remediation however goes beyond the limit, as the boundary cannot be detected easily in the field so more material than is required is usually removed.

The Committee asked about the EPA vs. NRC limits and the 4 mrem/year groundwater "limit". Mr. Paynter reviewed the memorandum of understanding between the NRC and EPA and said the NRC had notified the EPA of SNEC's situation (two nuclides are above the EPA consultation level). He said the EPA would likely not be involved, as the site will be released to levels well below the limit. He also said the 4 mrem/year drinking water "limit" would be met by meeting the 25 mrem/year site limit for all pathways.

The Committee summed up the remaining challenges as completing the remediation of the Class 1 areas and the characterization of the northwest area. The staff agreed with that position.

Other Issues – Art Paynter

Plan to Ensure Closeout of CAP's, Self-Assessments, QA Findings, etc. at Project Completion

Mr. Paynter said that a plan is in place to ensure these items are captured and that a self-assessment will be performed in April or May 2005 to close out any CAPs and outstanding issues.

Record Retention

Mr. Paynter reported that all of the FSS records would go to First Energy Corp. for retention and storage. They use the same storage facility as GPU Nuclear did and AmerGen does.

SNEC Overview – Lou Shamenek

Waste Shipping and Disposal

Mr. Shamenek reported that year to date 144 B-25 LSA boxes and six (6) inter-modal containers containing approximately 950,000 pounds of contaminated soil have been shipped to Duratek in Tennessee. Six of the boxes contained soil that was cross-contaminated with asbestos. The

majority of this waste is expected to meet "clean is green" criteria. All shipments for 2004 have been completed.

Mr. Shamenek said that remediation in the "BB" grids and the CV east yard may generate additional radwaste for disposal in 2005.

The Committee asked if Duratek segregates the material after it arrives. Mr. Shamenek said they do segregate into "clean is green" and that which must be disposed of at Envirocare in Utah. He reviewed the considerable cost of disposing of contaminated asbestos.

CAP's

Mr. Paynter reviewed the CAP status at this time.

The CAP related to the new US DOT regulation on radwaste shipments and the definition of radioactive material was reviewed. No violations occurred, as the regulation was not effective yet.

Management Tour Program

Mr. Paynter said the program is no longer a formal program given the decrease in variety of site work. Mr. Kuehn, Mr. Paynter, Mr. Shamenek and the GRCS's still tour periodically.

Site Safety Committee Program- Robert Holmes

Committee Communication with Management and Workers

Mr. Holmes reported that Site Safety Committee communication with Management and Workers remains good. He provided the Committee with an update on the Site Safety Committee makeup and activities.

Mr. Holmes said that the Site Safety Committee remains representative of the work force disciplines on site and serves as a communication tool in both directions between site management and the work force.

The Committee reviews the CAPs related to industrial safety for inclusion in the toolbox safety meetings and to ensure the word gets to all workers.

Summary of Recent Committee Activities

Periodic Committee meetings are held as well as site recognition activities to keep the work force focused on safe work practices. The Site Safety Committee meets less frequently now due to a reduction in site work activities.

Issues Identified in Recent Committee Meetings

The Site Safety Committee recommended specific actions related to the operation of the material conveyor, the deep excavations in the CV yard and protection from the cold weather during outside work. The Site safety Committee remains concerned over the possibility of "back-up alarm saturation" among the workers due the numerous pieces of large equipment moving in a congested area.

Community Relations- Robert Holmes

Community relation activities are ongoing as a collateral duty under Mr. Holmes.

The Citizens Task Force (CTF) meeting is being held concurrently with this meeting of the SNEC Oversight Committee. The CTF Chairman, Mr. Fockler makes frequent visits to the SNEC site for updates on the decommissioning.

Miscellaneous Business

The Independent Inspector, Mr. Rodger Granlund, said he would continue his monitoring and reporting activities until the license is terminated. He related in terms the layman could better understand, just how low the levels of radioactivity are being measured and would be left onsite. In most cases he said you are talking about levels so low that laboratory measurements are required to detect them. In effect he said the site is being released at a fraction of the allowable level due to the nature of remediation, i.e. in most cases one does not remediate to the limit but to a level much lower than that.

The Committee asked if arrangements are in place to retain the services of Mr. Granlund to act as the Independent Inspector until the license is terminated. Mr. Shamenek said the contract is in place to do so.

The Committee Chairman asked the CTF Chairman about the status of the CTF now that the project is winding down. The CTF Chairman, Mr. Fockler said that there had not been a formal CTF meeting in some time but that he and the Task Force members use the quarterly reports issued by Rodger Granlund the SNEC Independent Inspector, to keep up to date on the project. Mr. Fockler indicated that all of the information needed is provided in the Independent Inspector quarterly reports and the Oversight Committee meeting minutes. He related that in his view, the nearby communities feel the decommissioning project is largely over now that the large components and the containment vessel have been removed. Mr. Fockler did relate a call he received from a local citizen who was concerned about rumors of significant contamination near the river and in the "north east dump" region. Mr. Fockler said he got the details from the site and was able to allay the concerns.

The Committee Chairman opened the floor to members of the public and the press

Mr. Fuller, a local citizen asked if locations off the site property would be checked for radioactivity attributed to the SNEC operation. Mr. Paynter recounted the allegations concerning dumping of radioactive material at the Williamsburg Station that had previously been disproved. He said there are no plans to look off site, as there is no indication it is needed.

Mr. Granlund added that there was no indication of an intentional case of unwarranted contamination in or around the SNEC site.

Site Tour

The Committee toured the site to visit various areas that have been remediated and areas where post remediation surveys are ongoing. The Committee looked closely at industrial safety issues during the tour.

Executive Session

The committee concluded from the tour that the remaining challenges are mostly in the area of industrial safety. The Committee urges the staff to remain vigilant of safety issues and stated that this is probably one of the most hazardous industrial safety periods in the projects history given the type of work going on. The Committee suggests that the staff review the use of increased radio communications to announce vehicle movements and the possible use of bright "highway" vests to make field personnel more visible to equipment operators.

The Committee recommends the staff close out any risk concerning area classification north and west of the "birds eye" area.

The Committee recommends the staff resolve the acceptability of re-surveying the LSA boxes thought to contain soil below the DCGL. This has the potential to avoid unnecessary shipments of radioactive material.

The Committee lauds the staff and Mr. Paynter in particular for the considerable effort they have made to keep the NRC and ORISE involved and informed. The early participation of both the NRC and ORISE have been very beneficial to ensuring the project FSS will be acceptable to the regulator and this should provide a high level of confidence to the public that it has been done correctly.

The Committee Chairman said the Committee would continue to function through the decommissioning process until license termination.

The Committee discussed the following items for which they had requested follow-up at the previous meeting:

1. The Committee continues to stress the need for FENOC to use and maintain the experience gained on the SNEC project. This will be an ongoing item.
2. The Committee feels it is important for the SNEC staff to continue to quantify the remaining project uncertainties as best as possible and communicate them. This will be an ongoing item.
3. The Committee stressed the need for the SNEC staff to continue their vigilance on safety and to look out for hidden dangers and hazards. This will be an ongoing item.

The next meeting of the Committee was tentatively scheduled for April 26, 2005 at the SNEC facility. In order to accommodate members of the Saxton Citizens Task Force and other

interested parties from the local area, the meeting may be held in the evening. Specific times and location will be promulgated when available.

Prepared By: original signed January 13, 2005
Robert D. Holmes, Committee Recorder

Approved By: original signed January 13, 2005
Thomas Gerber, Committee Chairman