

File > Dockt 70.0036

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August 22, 1990

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Mr. D. J. Sreniawski U. S. Nuclear Regulatory Commission Region III 799 Roosevelt Road Glen Ellyn, Illinois 60137

Dear Mr. Sreniawski:

Attached is a proposed plan for containing limestone dust during unloading of the dry scrubbers and for sampling the limestone for contamination studies. We would appreciate any comments you may have on this plan.

Cordially yours EZA  $\swarrow$ 

H. E. Eskridge<sup>-</sup> Manager, Nuclear Licensing, Safety, and Accountability

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Inter-Office Correspondence

RWG/sld/5013 August 21, 1990

A. J. Noack

G. F. Palmer J. A. Rode

cc: L. F. Deul

TO: H. E. Eskridge

FROM: R. W. Griscom fin Concorm

SUBJECT: LIMESTONE SAMPLING PLAN FOR DRY SCRUBBERS

The following plan is for your submittal to the NRC as our proposed plan for evaluating the containment of the limestone unloading and the subsequent sampling of the limestone for release.

Four additional self-dumping hoppers have been ordered for unloading the limestone from the dry scrubbers. These four, and the present hopper, will be modified with a resilient top gasket to seal against the bottom of the scrubber valve and with a seal for the gap between the lid and the unload lip of the hopper. The top gasket is being replaced with a higher temperature rated gasket since the initial test resulted in a partially melted gasket. The gap under the lid was the only source of dust escaping from the hopper during a recent test of the system, thus the need for sealing this area.

We intend to unload the dry scrubbers in the routine manner of one each shift and two every other day shift. Four of the scrubbers will be unloaded into the new hoppers with a sample container in the top to catch a sample of the first rock unloaded, which represents the highest expected contamination from the inlet to the scrubber. The fifth scrubber will be unloaded into drums as presently done. Five samples will be taken during the unloading which will represent the bottom, or inlet, one fourth of the way up, half way up, three fourths of the way up, and the top of the scrubber. Samples in all cases will be taken with a container which holds approximately 1 kilogram of limestone. The discharge valve will be opened, as near as possible, in the same manner for all tests. This sampling will be conducted for 14 days, resulting in samples from ten fills of the five scrubbers.

After sampling, each sample will be spread out and surface counted with the PAC 4G. All of the samples will be milled in a hammer mill and collected in individual vacuum bags. A 50 gram sample will be withdrawn from the milled samples. These smaller samples will then be split three ways for possible independent analyses. A 0.5 gram sample will be taken from each of our 50 gram samples and will be counted on the Tennelec counter.

The bottom samples from the four scrubbers which use the bulk hoppers will be compared against the fifth scrubber with multiple samples to confirm that the bottom sample represents the highest contamination and is thus the most conservative sample for use in dispositioning the limestone.