

Canberra Nuclear Services Division, 1330 E. Golf Rd., Schaumburg, IL 60196 Tel. (708) 310-8650 FAX: (708) 310-8655

December 18, 1990

Mr. Mark Roberts U.S. Nuclear Regulatory Commission Region I 475 Allendale Road King of Prussia, PA 19406

Dear Mr. Roberts,

Pursuant to our telephone conversation last Friday, I am forwarding to you information related to our surveying methodology employed at the Westinghouse Bloomfield, New Jersey site, during remediation activities. Enclosed is a survey protocol, prepared for our survey personnel at the onset of decontamination activities. This protocol describes release criteria, survey methods and measurement guidelines. I have also enclosed samples of our instrument calibration certificates and QC logs. Our Quality Assurance Manual requires on-site response checks each day the instrument is in use. You will note that the protocol refers to RMC, since it was written prior to our official incorporation into Canberra Industries as the Nuclear Services Division.

As we discussed, the procedure followed during work at the site is to have the decontamination contractor, SEG, monitor as they work, and then have Canberra/NSD do confirmatory measurements. In this way, we get double coverage in all areas. For most cases, continuous surveying has been employed, since we are not comfortable with grid systems for close out surveys. I would estimate that we have surveyed more than 50%, and as much as 100% of all surface areas in the various locations which have been remediated.

I hope this provides you the information you require. If we can be of further assistance, please call this office.

Sincerely,

Leroy F. Booth, C.H.P. Manager, Nuclear Services Division

LFB:pd

Enclosures

cc: B. Bowman/WEC
 W. Bickerstaff/WEC

QFFICIAL RECORD COPY ML 10

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Scientific and Industrial Instruments



LUDLUM MEASUREMENTS, INC.

915 • 235-5494 - 235-4947 TELEX No. 466852 UD POST OFFICE BOX 810 FAX NO. (915) 235-4472

501 OAK STREET

SWEETWATER, TEXAS, U.S.A. 79556 -

CONVERSION CHART

CUSTOMER: Canberra 1 Rmc Date 6-26-89 Order No. 89-2104 Model No. 12 S/N 65287 C3 132 Detector Model 44-9 S/N 12058603 Source_____ 150 mci H.V.: 900 V Size

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Form 22 - 5/89								

Scientific and Industrial Instruments



LUDLUM MEASUREMENTS, INC.

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 • 235-5494 - 235-4947
 TELEX No. 466832 UD

 POST OFFICE BOX 810
 FAX NO. (915) 235-4472

 501 OAK STREET

SWEETWATER, TEXAS, U. S. A. 79556

43-5 S/N PR 05 8440 Bench Test Data For Detector____ Canberra BMC _____ Order No._ <u>89-2104</u> Customer S/N 65287 Distance Source to Detector Sur Counter____ Counter Input Sensitivity_ 36m/ Count Time_____ S/N 4337 Size 13, 202 cpm_Other_____ Isotope Pu 239

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2000 foot	2000 V
3000 foot	1975 V
4000 foot	1950 V
5000 foot	1925 V
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HV Plateau	Background	Source Count
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900	0	4800
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Jours Josso 6-26-89 Signature Date

Form 21 3/88

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DEC 07 '90 14:50 (W) E. _.RON AFFAIRS

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Westinghouse Electric Corporation Westinghouse Building Gateway Center Pittsburgh Pennsylvania 15222

December 7, 1990

Mr. Mark Roberts NRC, Region I 475 Allendale Road King of Prussia, PA 19406

Dear Mr. Roberts:

Attached is an agenda of discussion items for our conference call next week. As we discussed earlier, the best day is Friday, December 14. If this is still agreeable with you, I will initiate the call around 10:00 a.m.

Sincerely,

C. W. Bickerstaff, Manager Industrial Hygiene and Materials Transportation Environmental Affairs P.2/8

DEC 07 '90 14:50 (W) E.____RON AFFAIRS

AGENDA OF DISCUSSION ITEMS WITH RESPECT TO THE DECONTAMINATION PROJECT AT BLOOMFIELD, NJ

The management of Westinghouse is concerned with the time and cost of the decontamination work at Bloomfield, and wants assurances that additional clean up work will not be required at a future date. As a part of these assurances, they have requested that we review our procedures and methods with the NRC. The purpose of this review is to confirm that clean up criteria are being applied correctly and that decontamination activities are being completed in a manner acceptable to the Commission.

As submitted in the WEC decommissioning plan, the criteria being applied are consistent with Table 1 from Reg. Guide 1.86. With respect to this criteria, we wish to discuss and clarify the following:

- The Table allows "maximum and "average" contamination levels. We assume the correct method of compliance is to simply take the arithmetic average of all readings within an area (1 square meter), provided no reaings exceed the maximum criteria.
- 2) We have applied surface contamination criteria to contaminated concrete. This contamination may be absorbed into the concrete surface, to a minimal depth (i.e. 1 cm), causing a volume to be contaminated. However, we intend to continue to apply surface criteria to this situation.
- 3) In most cases where we have removed contaminated soils, the excavations have been left open to allow inspection and verification. In isolated areas where

P.3/8

DEC 07 '90 14:51 (W) ENVIRON AFFAIRS

P.4/8

P.3/3

DEC 07 190 12:13 CANBERRAINSD MNRO 1703-310-8655

contaminated soils have been removed, the excavations have been back filled to preserve safety or structural integrity. Records demonstrating successful decontamination have been maintained.

- 4) Several pieces of equipment and other materials have been removed from contaminated areas, cleaned and currently meet the criteria for acceptable surface contamination levels. Are there any additional restrictions on unrestricted release? It is our interpretation that materials which meet the Reg Guide 1.86 criteria may be released with no further restrictions.
- 5) Although many drains and underground pipes have been excavated and disposed of, at least one pipe presents a significant problem with respect to economics and safety. This is addressed in the attached hazard evaluation and is the approach we would take with similar situations in Bld 9. Does this assessment satisfy the requirements of the Commission?
- 6) During the recent pre-inspection visit, ORAU indicated they might be able to perform the release survey of areas south of Arlington Avenue in early December. Because of impending holday breaks and inclement weather it would be preferable to complete the survey at this time. What is the current survey schedule?

DEC 07 190 14:52 (W) ENVIRON AFFAIRS

REQUEST FOR RELEASE OF AN UNDERGROUND PIPE

During remediation of Room 106, a drain was found to be The drain and associated piping were removed by contaminated. excavation within Room 106, and followed into Room 105 and 104. A total of appoximately 30 feet of pipe was removed to the wall of Room 104. During excavation, it was found that the pipe traversed downward to a depth of 8 feet in Room 104. Since further removal would have meant likely partial destruction of floors and load-bearing walls, excavation was halted. Smoke testing of the pipe was unsuccessful in identifying the exit point and indicated possible blockage of the pipe. Facility drawings and knowledge of piping system indicate that the pipe probably exits Building 7 the and empties into the sewerage system under Arlington Avenue. This drain has not been used for several years.

Since excavation of the entire pipe would be prohibitively expensive and might compromise the structural integrity of the building, it is proposed to cap the exposed end of the pipe, back fill the existing excavation, and leave the pipe in place. This proposal is based on the following hazard evaluation.

The subject pipe is a 6 inch diameter, cast iron pipe, probably with soldered joints. The pipe is known to be eight feet below ground surface and does not exit at any identifiable location within the site.

The pipe is known to be contaminated at the exit point in Room 104 with low levels of natural thorium. The gross external exposure rate at contact is 30 uR/hr (background is about 10 uR/hr). Exposure rates at 3 feet are indistinguishable from background. The pipe cannot be detected at floor level with the most sensitive survey instruments.

The interior of the pipe was surveyed for total and removable contamination. A 2 inch diameter thin window GM tube was placed in close proximity to the interior pipe surface and a maximum reading of 2000 cpm was obtained. Assuming the GM tube viewed a 20 sq cm area of the pipe and had a beta efficiency of 20%, the total

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activity is Activity = 2000 cpm @ 20% eff = 10,000 dpm/20 cm² = 500 dpm/cm² = 2.25 E-4 uCi/cm² The inner area of the pipe is = 47.87 cm (circumference) x 30 cm/ft = 1.46 E3 cm² per foot Activity in pipe = (1.46 E3 cm²/ft)(2.25 E-4 uCi/cm²) = 0.328 uCi per foot of pipe

If the pipe runs to Arlington Avenue, the estimated length is 150 feet. Therefore, the total activity in the pipe is estimated to be = 0.33 uCi/ft x 150 ft

= 50 uCi natural thorium

Surface wipes indicate that approximately 50% of the activity is removable.

1) External Hazard

Assume the pipe is left in place. External dose rates to personnel continuously present at a surface 8 feet above the pipe will be within natural background levels.

Assume the pipe is excavated. If a worker were to handle the pipe for one hour, the contact dose to his hands would be approximately 0.03 mrad (30 urad). Assuming the exposure rate at 3 feet is 3 uR/hr (inverse square from contact), workers in the vicinity of the pipe for 8 hours might be exposed to a 24 urad dose.

We conclude the external hazard from this pipe is negligible.

2) Inhalation Hazard

Assume the pipe is excavated, broken, and all removable contamination released to the environment. Assume the total

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Activity = 0.33 uCi/ft x 3 ft x 0.5= 500 pCi/sq. meter

If a reasonable resuspension factor of 10^{-6} km $^{-1}$ is used, the airborne concentration is

= $500 \text{ pCi/m}^2 \times 10^{-6} \text{m}^{-1}$ = $5 \text{ E}-4 \text{ pCi/m}^3$ = $5 \text{ E}-13 \text{ uCi/cm}^3$

The MPC for natural thorium, unrestricted, is 2 E-12 uCi/cm³.

Using conservative assumptions, the worst case airborne concentration would be less than MPC for unrestricted areas.

3) Ingestion Hazard

Assume the removable activity within the pipe, 25 uCi, is released to the environment, either by leaking from the pipe, or by excavating the pipe, as above. The most likely form of the thorium, from knowledge of site materials, is as an insoluble oxide. Thus, uptake into food pathway vegetation or migration to ground water is very unlikely. However, if material migrated to ground water, a volume of 3000 gallons would dilute the entire activity to less than 2 E-6 uCi/ml, the MPC in water for unrestricted use.

We conclude this activity does not present a significant ingestion hazard.

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Westinghouse

Electric Corporation

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Environmental Affairs

Westinghouse Building Gateway Center Pittsburgh Pennsylvania 15222

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Scope

Bidg. 150 Change 1. 2-5 2 Duct, Downstream from Area 4, 2nd Floor Th 2. 2 2-6 Th Blower, Dutside Area 4, 2nd Floor 3. 3-2 3 Garage Area, 1st Floor Ra ł U 4. 1-2 Dock Area, 1st Floor 5. 6-1 1 U Pipe Chase, Roof to Basement 7 U 6-2 Freight Elevator 6. Ľ 7 7. 8-3 Buffalo Blower, Roof 8. 1 U 1-1 Pipe Chase, Bldg. 7, Under Area 43 9, 7-2 7 Res. 104, 105, Bldg. 7 Th 18. 7-4 1 Rm. 313, Bldg. 7 Th 11. 7-5 7 Ra. 213, Bldg. 7 Th 12. 7-6 7 Res. 516, 517 Th 7 Th. 13. 7-7 Ras. 189, 118 14. 7-8 7 Res. 312, 317 Th, U 15. 7-9 7 Re. 119 Bldg. 7 Th 7 Ü 16. 7-18 3rd Floor, Hallway at Elev. 17. 7-11 7 Re 111, Bldg. 7 Th 7 18. 7-12 Basement to 5th Floor Th 17. 7 7-13 Rs. 118, Bldg. 7 Th 28. 7-14 7 Res. 101, 182, 103, 117, 122, 123A Th 123, 125, 126, 127, 128 7 Th 21. 8-1 Pipe Chase, Roof to Rm 185 22. 8-2 7 Duct from Rm 186 to Roof Th 23. 1 8-3 Pipe Invest. Downstream from Area 42 Th 24. 9-4 8 2nd Floor, Res. 1-12 Th, U 25. 13-1 Behind Bldg. 6, At RR Tracks, Soil Th 7 26. 14-3 Exterior, S. Side U 27. 9 Th 15-2 Exterior SW, Susp, Nan-holes 28. 15-3 8 Exterior, W. Man-hole U. 29. 16-1 Incin. Incinerator Decon. U, Ra Incin. Environmental Clean-up 38. 16-2 U, Ra 31. 16-3 Suep East of Bldg. 1 Th Between Bldg. 445 32. 18-4 Sump. Th 33. 28-1 8 7 Areas, 1st 4th Floors Basement Floor Areas 1. Th 2. 1st Floor & Transformer Th 3. 1st Floor, overhead Drain Pipes Th 1st Floor, SE Acid Room 4, Th 5. 2nd Floor Spot Ľ 6. 3rd Floor Spot Th

7.

4th Floor Areas

Th

BLOOMFIELD PLANT STATS.

10-18-

YE BLOG NO.	TOTAL OFFICE SINCE- SQ.FT.	TOTAL MEG. SPACE - SQ. FT.	TOTAL WHSE. SANCE-SQ.FT.	TOTAL BLD'CA SAACE-SQ.FT.	MISC. STATS
1919/1906	58 306	16 533	13 182	88 021	12 BLDG5 INCLUDING POWERHOU
1907 2	_18 000	136 799	1 600	156 399	
1920 3	11 000	129 636	48 212	188 848	1025481 SQ.FT. OF FLOOR SPACE
11/1/20 4	68 736	64 936	4 600	138 272	
riny1916 5	7 600	45 958	30 358	83 916	14.78 ACRES OF BLFD. REALEST
1912 6		29 299		29 299	
112/1927	82825	•		82 825	APPROX. 800 TONS OF AIR CONDITIO
1929 8	11600	135 095	4 400	151 095	
1923 9		16830		16830	16000 KYA of Power@26,000V
1923 10		2000	9840	11 840	BLDG + 10 WAS DEMOLISHED -
1930 IOA		400	3545	3945	2898 MAX. STEAM BOILER H.P.
/1927 11 Powerlouse				9 403	
MISC.		577 401		64 788	3500 C.F.M. Compressed High f
IOTALS	258 067	5/7 486	115 737	1,025 4815	FT.
	(e)				11 ELEVATORS
•		FUEL OIL	TANKS		
)		(4) STORAGE	1AX5-20,0	00 GALS.	1690 EMPLOYEES
· - · · · · · · · · · · · · ·		(I) OLT OF	SERVICE #2(Fux	DED WITH WITER)	170 TO DIAN - DOGI - CO -
· · · · · · · · · · · · · · · · · · ·		(1) DEKNIC	E TANK-10	000 GALS.	132 IN PLANT MARKING SHACE
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	· · · · · · · · · · · · · · · · · · ·	• • • • • • • • • • • • • • • • • • •	+		PARKING SHILES
· · · · · · · · · · · ·			· · · · · · · · · · · · · · · · · · ·		DADVING SOACE
· · · · · · · · · · · · · · · · · · ·			• • • • • • • • • • •	····	DO VICITOR DOVING SPACE
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