

MAR 25 1994

License No. SMB-1527
Docket No. 040-08976
Mail Control No. 117065

Westinghouse Electric Corporation
ATTN: C. Wayne Bickerstaff
Manager, Industrial Hygiene and
Materials Transportation, Environmental Affairs
Westinghouse Building
Gateway Center
Pittsburgh, Pennsylvania 15222

Dear Mr. Bickerstaff:

Subject: ADDITIONAL INFORMATION REGARDING BUILDINGS 7, 8, 9 AND
10A, BLOOMFIELD, NEW JERSEY FACILITY

This in reference to your application dated August 24, 1992 requesting release for unrestricted use of Buildings 7, 8, 9 and 10A at your Bloomfield, New Jersey facility. This also refers to your letters dated January 26, 1994 and February 21, 1994 describing your partial demolition plans for Buildings 9 and 10A and your final survey plan, respectively.

Due to the structural problems described in your January 26, 1994 letter, the NRC has no objection to the concurrent demolition and survey of portions of Building 9 in order to carry out work in this building in a safe manner. We also have no objection to selected demolition in Building 10A to allow access for equipment to Building 9. However, you should not release any debris from the facility until the resolution of our comments and the approval of the final survey/remediation plan.

In order to continue our review of the final survey plan, we need the following information:

1. Your submissions of January 26, 1994 and February 21, 1994 contain procedures from your contractor, Scientific Ecology Group, Inc. (SEG). The cover sheet on each of the procedures indicates that the procedures are proprietary information and the property of SEG, and, therefore, may not be disclosed without written permission from SEG. 10 CFR 2.790 states, in part, that final NRC records and documents, in the absence of a compelling reason, will be made available for public inspection. 10 CFR 2.790(a)(4) allows for the exclusion of trade secrets or privileged or confidential commercial information, provided that the person who proposes that the information be withheld from disclosure submits an application and affidavit for such withholding in accordance with 10 CFR 2.790(b). The Commission will make a determination in accordance with 10 CFR 2.790 whether information should be

withheld. Since neither an application for withholding nor an affidavit accompanied your January 26, 1994 and February 21, 1994 letters, submit the required application and affidavit or confirm that the information can be made publicly available.

2. Your submissions of January 26, 1994 and February 21, 1994 contain a list of procedures that will be used during the remediation and final survey of the facility. Confirm that at least one complete copy of each procedure will be available at the facility for reference.
3. Your January 26, 1994 letter discusses the use of biased surveys. Describe the scope of such a biased survey including the typical items that may be considered for in the biased survey.
4. In step 4.2.3 of Procedure REDS-RAM-103, Unconditional Release of Tools, Equipment and Waste Materials, there is an editing mistake in the definition of Radioactive Material. Correct the procedure.
5. In step 5.1.6 of Procedure REDS-RAM-103, the statement that wastes "... contain no detectable quantities of radioactivity." is too limiting and does not appear to allow for the presence of naturally occurring radioactive materials nor licensed material less than decommissioning guidelines. Provide more suitable wording in this procedure step.
6. In steps 5.2 and 5.3 of Procedure REDS-RAM-103, you discuss instrumentation criteria and release criteria, respectively, for beta-gamma and/or alpha contamination. While these criteria are appropriate, the procedure does not provide sufficient guidance for selecting instrumentation or applying the appropriate release limit for thorium contamination. Since there is documented thorium contamination in the facility, you should provide specific guidance for monitoring and release of material from areas where thorium is the primary contaminant.
7. In section 2.2 of the Final Survey Plan, you define an objective to survey a 10-meter radius around each of the locations identified as "potentially contaminated" by ORISE in their confirmatory survey conducted May 10-14, 1993. This survey objective is not sufficient for Buildings 9 and 10A nor the basement of Building 7. The ORISE confirmatory survey was a sampling of selected areas and did not completely characterize these areas. Commit to surveying these entire areas and not just the areas within a 10-meter radius of the "potentially contaminated" locations identified by ORISE.
8. The Survey Objective identified in Section 3.1 of the Final Survey Plan is "to demonstrate that licensed radioactive materials have been removed from the Bloomfield Lamp Plant in the documented survey areas of Buildings 7, 8, 9 and 10A to levels below regulatory limits ...". Since contamination in excess of NRC

guidelines for release for unrestricted use has been identified in areas outside the buildings, you should include in your objective that licensed radioactive materials must also be removed from the contaminated areas outside the buildings and that surveys demonstrate that these areas do not have residual contamination in excess of NRC guidelines for release for unrestricted use.

9. Section 3.2 of the Final Survey Plan identifies natural uranium as a contaminant in areas of Building 7, Building 8 and the facility grounds. Table 3.1 in Section 3.1 of the Final Survey Plan identifies a soil contamination level of 35 picocuries/gram (pCi/g) for uranium. Based on previous measurements by ORISE, the uranium contamination present at the facility does not appear to be natural uranium, but is processed uranium which does not include the uranium-234 (U-234) decay products. The NRC has determined that a residual concentration guideline of 35 pCi/g of uranium is applicable for processed uranium. The guideline for natural uranium is 10 pCi/g assuming all decay products are present and in equilibrium. Confirm the identity of the uranium contamination and apply the appropriate limit.
10. Section 5.5 of the Final Survey Plan discusses applying NRC guidelines for soil samples from outdoor areas. Confirm that you will apply the appropriate NRC guidelines for soil samples from indoor areas since remediation in some of the buildings has exposed soil beneath the concrete floors.
11. Section 5.0, Final Survey Process does not explain how contamination in soil (both indoors and in outside areas) will be investigated to ensure that NRC guidelines will be met. Describe the preliminary survey, remediation, and final survey activities that will be conducted for areas where contaminated soil exists.
12. In Appendix A, List of Procedures, you list four procedures relating to the use of respiratory protection equipment. If you intend to utilize respiratory protection equipment during remediation activities, you must ensure that you meet applicable regulations in 10 CFR 20.1703. Prior to implementation of your respiratory protection program involving use of individual respiratory protection equipment, submit a copy of the policy statement on respiratory protection (10 CFR 20.1703(a)(4)) and the written notification to the NRC Regional Administrator (10 CFR 20.1703(d)) for our review.
13. Step 5.4.5 (2.) (b.) of procedure REDS-FSP-100 indicates that outdoor areas and grounds in affected areas will surveyed on a 10-meter grid. Although this is appropriate for the general areas, there are specific contaminated areas (e.g. the numerous manholes on the grounds and the specific contaminated area on the south end of Building 9) that should be surveyed as discrete locations. Confirm that the surveys of outside areas will specifically evaluate these areas.
14. Provide a tentative schedule for your operations.

Step 5.6.6 (2.) in procedure REDS-FSP-100 and step 5.3.5 in procedure 5.3.5 both discuss how you will apply the NRC guideline of 5 μ R/hour above background. Although this criteria is not an issue on this site, your methodology will need further discussion before we will accept it for use at another site.

We are also waiting for the additional information relating to our questions in our July 26, 1993 letter concerning the basement in Building 7. We have received and are reviewing the additional groundwater data requested in our letter dated September 17, 1993.

We will continue our review upon receipt of this information. Please reply in duplicate to my attention at the Region I office and refer to Mail Control No. 115462. If you have any technical questions regarding this letter please call the Mark Roberts at (610) 337-5094 or me at (610) 337-5252.

Thank you for your cooperation in this matter.

Sincerely,

Original Signed By:

John D. Kinneman, Chief
Site Decommissioning Section
Division of Radiation Safety
and Safeguards

bcc:
Region I Docket Room (w/concurrences)
M. Roberts, RI

RI:DRSS
Roberts *MR*

03/24/94

RI:DRSS
Kinneman

03/25/94