



REGISTRATION

2001 JAN -9 PM 4: 02

State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection

Robert C. Shinn, Jr.
Commissioner

Richard K. Smith
Viacom, Inc.
11 Stanwix Street, Room 383
Pittsburgh, PA 15222

JAN 2 2001

Re: ISRA Case Name: North American Philips Lighting Company
Responsible Party/Property Owner: Viacom/CBS Corporation
1 Westinghouse Plaza
Bloomfield Township, Essex County
ISRA Case #E86070
Final Radiological Status Survey Report Building 7 and Sewer System
Remediation dated August 2000 (Cover Letter dated August 30, 2000)

Dear Mr. Smith:

The New Jersey Department of Environmental Protection (NJDEP) has reviewed the above referenced document. The following issues shall be addressed/answered prior to the NJDEP commenting further on the above referenced document.

1. The NJDEP acknowledges that soil samples were analyzed by either alpha-spec or gamma-spec, both with extensive quality control procedures. Is there data correlating the results of samples from one location analyzed by both methods?
2. The NJDEP suggests that μ_{α} be calculated with the same number of significant figures in the input data on the following sets of tables and figures: Table C-1 and Figure C-1, Table D-1 and Figure D-1, Table H-4 (H-1?) and Figure H-1, Table I-1 and Figure I-1, and Table J-1 and Figure J-1. Viacom shall confirm that the μ_{α} calculations for each of these survey units are the same. If they are not Viacom shall explain.
3. Viacom shall inform the NJDEP if Figures G-2 and G-3 contain data that is prior to the final remediation and therefore not part of the final survey. Additionally, Viacom shall clarify if Figure G-4 should be labeled "final survey" and not "final excavation".
4. Table G-5 shows the results of 59 soil concentration data points and calculations of average, standard deviation and μ_{α} for these data points in survey unit G. Nine of these data points (FS-122, FS-125, FS-127, FS-133, FS-143, FS-146, FS-157, FS-158 and FS-159) are not listed in Figure G-4. Viacom shall clarify why these data points are not on Figure G-4.

5. Table G-5a for weighted average is labeled as Grid 1. It contains data points from Grids 1, 2 and 3 therefore should Table G-5a be relabeled? Viacom shall explain why the weighted average for grids 1 and 2 were not done separately since they contained elevated results. Viacom shall explain why data point FS-148 is in Figure G-4 for grid 1 but not on Table G-5a. Viacom shall explain why data points FS-122, FS-127, FS-133, FS-143, FS-146, FS-157, FS-158 and FS-159 are included in Table G-5a and not included on Figure G-4.
6. Viacom shall inform the NJDEP which data points in Table G-5a are included in the 4 m² hot spot with an average of 1.01 Sum, and in the 8 m² hot spot with an average of 1.28 Sum.
7. There is no hot spot weighted average for the backfill material used for Survey Unit A, see Table K-1a. It is stated in Appendix K that approximately 12 pCi/g of Thorium was observed in three of the 30 samples. Viacom shall clarify if this material was mixed before it was backfilled into Survey Unit A. Viacom shall also determine the average concentration of the total uranium and the total thorium represented by these 30 samples. That is, multiply each sample result by the volume of soil it represents. Total these figures and divide by the total volume of soil referenced on Table K-1a. The calculation of μ_{α} is meaningless in this application. μ_{α} assumes a near-homogeneous depth of contamination and does not take into consideration the volume of soil that is represented by each soil concentration result in Table K-1a.
8. Viacom shall correct or explain the radionuclide designations on pages 39-40 of Table P-1, "Final Soil Sample Locations and Laboratory Results", for samples FS-159, FS-160, FS-161, FS-162, FS-164, FS-166, FS-167, FS-168, FS-169, FS-170, FS-171 and FS-172.

Viacom shall submit a response within 45 days of receipt of this letter. If you have any questions regarding this letter, please contact the Case Manager, Stephen Myers, at 609-633-1392.

Sincerely,



Bryan Moore, Supervisor
Bureau of Environmental Evaluation,
Cleanup and Responsibility Assessment

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