



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

March 9, 2000

Mr. Richard M. Bartosik, Licensing Manager
BWX Technologies, Inc.
R.D. 1, Box 355
Vandergrift, PA 15690

SUBJECT: REVIEW OF DOSE ASSESSMENT FOR BUILDING A AND B ROOFS

Dear Mr. Bartosik:

I am writing in response to your letters dated November 13, 1998, and July 7, 1999, requesting the Nuclear Regulatory Commission (NRC) staff's approval to dispose of portions of the roofs for Buildings A and B of your Parks Township, PA, facility, in a conventional landfill. To support your request, you provided an assessment of the potential doses that might result from the disposal of the material in a landfill.

The NRC staff has completed its review of the dose assessment for Building A. Based on this review which would also pertain to the Building B roof, we have concluded that you have not adequately demonstrated that the potential doses to workers or the public are consistent with NRC's limits on radiation exposures to members of the public. Specifically, we have determined that additional exposure scenarios must be evaluated, the assumptions and parameters used in the dose modeling must be justified and information on the source term must be further developed.

In addition, you are requesting the staff's approval to dispose of this material in any conventional landfill. Because the roofing material contains radioactive material licensed by the NRC, disposal of the material can only be approved pursuant to NRC's regulations at 10 CFR 20.2002. In order to approve a request pursuant to 10 CFR 20.2002, NRC staff will require that you obtain the consent of a landfill prior to disposal of the material, as well as the approval of any other entity with regulatory authority at the landfill. Additional information on the landfill in which the material will be disposed, as well as information on how you have obtained the approval of the landfill and other regulatory authorities for the disposal will need to be submitted to support your request.

The staff believes that the most efficient way to proceed with your request is to meet with you to discuss the staff's specific concerns in detail. As with all meetings between NRC and its licensees, this meeting would be noticed in accordance with NRC requirements and be open to observation by interested members of the public. A member of my staff will be contacting you to arrange this meeting.

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BWXT Technologies, Inc.

a McDermott company

BWXT Services, Inc.

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August 17, 2000

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(724) 845-2808
Fax: (724) 842-1478

Mr. Jon M. Peckenpaugh
Low Level Waste and Decommissioning
Projects Branch MS T7F-27
Division of Waste Management
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SNM-414
Docket No. 70-364

Subject: Response to NRC Recommendations on Revising the Building Roof Dose Assessments and Final Disposition Path of Roof Material

Reference: (a) USNRC Letter (L. Camper) to BWXS (R.M. Bartosik) dated March 9, 2000,
Subject: Review of Dose Assessment for Building A and B Roofs
(b) Meeting Between USNRC and BWXS, April 17, 2000
(c) USNRC Letter (L. Camper) to BWXS (R.M. Bartosik) dated June 22, 2000,
Subject: USNRC Commission Staff Recommendations for Revising the Dose Assessment for Building A and B Roof Materials at Parks Township, Pennsylvania

Dear Mr. Peckenpaugh:

References (a), (b), and (c) provided the Nuclear Regulatory Commission (NRC) comments on the Building A and Building B roof dose assessments. The NRC further stated that because the roofing material contains radioactive material licensed by the NRC, our request to release this material for unrestricted use for disposition in a local landfill could only be approved pursuant to 10CFR20.2002. BWXT Services, Inc. (BWXS) has considered your recommendations carefully and decided not to release this material for unrestricted use for disposition in a local landfill.

BWXS has decided to disposition the roofing material through our low-level radioactive waste broker, GTS Duratek (GTS). BWXS is in the process of shipping the majority of the roofing material to GTS for processing and ultimate disposition. The uncontaminated gravel ballast (small stones) that was on top of the roofing material is being retained on site for use in haul roads, to stabilize muddy working surfaces, or for use as clean backfill. As with all uncontaminated gravel used on site, this material will be sampled during final survey and dispositioned as appropriate.

ADD: AMIR KUBESTAIN
(AAK)
to ends
NMSOIPUB/11

Subject: Response to NRC Recommendations on Revising the
Building Roof Dose Assessments and Final Disposition

SNM-414
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The GTS pathway was selected because it eliminates a major schedule constraint in completing the active decommissioning this year and provides an independent assay of the materials' radiological content. GTS is processing the roofing material, in accordance with their license, under their Green is Clean program. The Green is Clean program uses radionuclide-specific criteria to determine suitability for release. These criteria were developed and approved based on a comprehensive dose assessment for applicable exposure scenarios and receptors. As the roofing material is assayed, the material will be either released by GTS to a landfill or dispositioned as radioactive waste.

BWXS stands by our position that local landfill disposal of the roofing material would have been consistent with NRC dose limits for protection of workers and members of the public. However, since the material is being dispositioned off-site, no quantitative responses to your comments in Reference (c) are planned.

If you have any further questions regarding this submittal, please contact me at (724) 842-1472.

Sincerely,



Richard M. Bartosik
Manager, Licensing

Attachments

cc: R. Maiers – PaDEP (Harrisburg Bureau of Radiation Protection)
T. Dimitriadis - NRC Region I
J. J. Matviya – PaDEP (Southwest Region)
J. Yusko – PaDEP (Southwest Region)
L.R. Bauer
GTS Duratek



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rec. 8/30/00

Mr. Jon M. Peckenpaugh
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