

From: Julie Olivier *NM65/FCSS*
To: John Lusher
Date: 3/21/03 9:41AM
Subject: Vanadium issue

John -

As agreed during the meeting with OGC on 3/6/03, members of the Clearance Working Group reviewed the IUC's 4/18/01 correspondence concerning the release of vanadium product from the White Mesa Mill site. The staff review did not address OGC's view that the vanadium product should be classified as 11e.(2) byproduct material.

Based on the assumption that the contaminated vanadium should be released under the existing guidance for controlling the disposition of solid materials, the following recommendations are provided for your consideration:

1. The vanadium represents a "volumetric," rather than surficial, source of contaminated solid material. The existing guidance for evaluating the disposition of solid materials with volumetric contamination is 10 CFR 20.2002.
2. The licensee's dose assessment was based on the assumption that external (gamma) radiation should be evaluated only and that the appropriate dose limit for this type of release is the 10 CFR 20 public dose limits.

In accordance with the provisions of 10 CFR 20.2002, the licensee should evaluate all applicable exposure pathways and scenarios associated with the release of this material for unrestricted use. Consistent with the November 2001 and December 2002 memos on disposition of volumetrically contaminated solid materials (soil and concrete), the acceptance range of "a few mrem/yr" is applicable for this case rather than the 10 CFR 20 public dose limits.

3. Members of the CWG will support FCSS's request to participate in a telephone conference call with the licensee next week. However, if FCSS or the licensee plans to request further work on this case, there should be a TAR issued to DCB/DWM.

Let Tony Huffert or myself know if you have any questions.
Julie

CC: Anthony Huffert; Audrey Hayes; Bill VonTill; Frank Cardile; Mark Thaggard; Phyllis Sobel; Stephen Klementowicz

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