



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

MAR 26 1992

MEMORANDUM FOR: Ronald E. Bellamy, Chief
Nuclear Materials Safety Branch, RI

FROM: John E. Glenn, Chief
Medical, Academic, and Commercial
Use Safety Branch
Division of Industrial and
Medical Nuclear Safety, NMSS

SUBJECT: TECHNICAL ASSISTANCE REQUEST/(CONTROL NO. 114894)
RE: BURIAL OF ANIMAL CARCASSES CONTAMINATED WITH
LICENSED MATERIAL

This is in response to your Technical Assistance Request (TAR) (enclosed) dated November 29, 1991 regarding approval pursuant to 10 CFR 20.302 of the burial of animal carcasses contaminated with licensed material at the U.S. Department of Agriculture's (USDA) Jornada Experimental Range, Dona Ana County, New Mexico.

Any applicant may apply to the Commission pursuant to 10 CFR 20.302 for approval of proposed procedures to dispose of licensed material in a manner not otherwise authorized in 10 CFR 20. NUREG-1101, Vol. 1, "Onsite Disposal of Radioactive Waste", (enclosure) supplements 10 CFR 20.302 by listing the information necessary to evaluate the application, and provides a description of the acceptable methods and techniques.

Approval of this application requires review and coordination with the Low-Level Waste Branch (LLW). In order to review this application, LLW will require the necessary information required by NUREG-1101, Vol.1. Several items of information required by NUREG-1101, Vol.1 are not addressed in the USDA application, dated June 27, 1991, provided with the TAR. The necessary information from NUREG-1101, Vol.1, not found in the application is as follows:

- a) Item 3.5 "Burial Location" of the NUREG, requires a description of the relation of the burial site to the surrounding environs and a scale map or sketch, with scale included, which shows the site boundaries and the applicant's property line.
- b) Item 3.11 "State and Local Requirements" of the NUREG, requires in part that the application contain a statement as to whether a notation has been made on local government land records as to the location of the burial of radioactive waste.
- c) Item 3.12 "Certificate" of the NUREG, requires in part that the application for burial contain the following certificate:

"The applicant and any official executing this application on behalf of the applicant certify that this application and all information contained herein, including any supplements attached is true and correct to the best of our knowledge and belief"

CLASSIFICATION TO REGULATORY CENTRAL FILES

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Ronald E. Bellamy

- 2 -

The Region should request that USDA provide the additional information noted above, and forward this information to my attention in order that the application can be properly evaluated. This Branch will coordinate with LLW on the evaluation of the application.

If you need further information concerning this matter, please contact James Smith of this staff at FTS: 964-2613.

John E. Glenn, Chief
Medical, Academic, and Commercial
Use Safety Branch
Division of Industrial and
Medical Nuclear Safety, NMSS

Enclosures: As Stated

DISTRIBUTION: IMAB712

NRC File Center	TAR r/f	JEGlenn	RECunningham
JGreeves	IMNS Central File	PCVacca	RRBellamy, RI
DCollins, RII	JGrobe, RIII	RJPate, RV	MShanbacky, RI
JKinneman, RI	PSwetland, RI	CHosey, RII	GMMcCann, RIII
BPrange, RV	MLamastra	RFonner, OGC	NMSS r/f
JPelchat, RII	LJCallan, RIV	VLMiller, GPA/SP	WFisher, RIV
JRicci, AEOD/TTC	CCain, RIV	LWCamper, IMAB	IMAB r/f
JPiccone, IMAB	JJohansen, RI	FCombs, IMOB	JSmith, IMAB
			<u>JAUSTIN, LLW</u>

OFC : IMAB *NB* : IMAB *file* : IMAB : IMOB : LLDR : OGC *by your signature*

NAME : JSmith: rj: LWCamper : *JE Glenn* : *F Combs* : JAustin : STRaby

DATE : 03/10/92 : 03/17/92 : 03/28/92 : 03/24/92 : 03/24/92 : 03/16/92

OFFICIAL RECORD COPY
IMAB712

REQUEST FOR TECHNICAL ASSISTANCE

DATE: 11-29-91

TO: John E. Glenn, Chief, Medical, Academic, and Commercial
Use Safety Branch, NMSS

FROM: Ronald R. Bellamy, Ph.D. ^{RRB} Chief, Nuclear Materials Safety and
Safeguards Branch, Region 1

LICENSEE: U.S. Dept. of Agriculture LICENSE NO.: 19-00915-03

Control No. 114894 (enclosed)

Letter dated _____ (enclosed)

Suggested change in licensing procedure (enclosed)

Other (see remarks)

Problem/Issue: Burial of animal carcasses contaminated with licensed material.

Action Required: Approval pursuant to 20.302.

Alternatives Considered: Recovery of carcasses for disposal at commercial
burial site.

Recommended Alternative: Remain buried at current site.

Remarks: Incident leading to the burial has been reviewed with all parties
involved.

Regional Reviewer: E. Ullrich
Reviewer Code: Q-5
Reviewer Phone No.: FTS 346-5040



United States
Department of
Agriculture

Agricultural
Research
Service

Radiological
Safety
Staff

6303 Ivy Lane
Greenbelt Maryland
20770-1433

03004530

JUN 27 1991

John D. Kinneman
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, Pennsylvania 19406

Dear Mr. Kinneman:

This is a request for burial of radioactive material under 10 CFR 20.302. Frederick F. Knowlton, Leader, Ecological and Behavioral Applications Project, APHIS, conducted an experiment earlier this year under the Utah State University (USU) license with reciprocity from the State of New Mexico at the USDA, ARS, Jornada Experimental Range in Las Cruces, New Mexico. The reciprocity agreement was rescinded by the State of New Mexico on May 10, 1991. Through discussions with Frank Costello, of your office, we understand that any continuing activities associated with this experiment are considered USDA licensed activities under the USDA U.S. Nuclear Regulatory Commission License No. 19-00915-03.

The enclosed letter from Dr. Knowlton, describes the radioactive materials he has buried at the Jornada Experimental Range as a result of the experiment. He also describes the hydrogeological characteristics and security of the burial site. The USDA Radiological Safety Staff has determined that, because of the short half-lives of the radioisotopes and the distance of the materials to the water table, the material is not likely to migrate from the burial site and the burial is not likely to result in exposures to individuals living in the surrounding area. The USDA will control access to the burial site for at least 6 half-lives (approximately 12 years) at which time there will be approximately one microcurie of cesium-134 remaining.

If you have any questions or if our understandings are incorrect, please contact me on FTS 344-0193.

Sincerely,

John T. Jensen
Director

Enclosure

"OFFICIAL RECORD COPY" ML 10 114894

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United States
Department of
Agriculture

Animal and
Plant Health
Inspection
Service

Science and
Technology

Denver Wildlife Research Center
Building 16, P.O. Box 23200
Denver Federal Center
Denver, CO 80225-0200

ECOLOGICAL AND BEHAVIORAL APPLICATIONS PROJECT
USDA/APHIS/S&T/DWRC
UTAH STATE UNIVERSITY
LOGAN, UTAH 84322-5105

TO: John Jensen, Radiological Safety Office, USDA/ARS,
Greenbelt, Maryland 20703

FROM: Leader, Ecological and Behavioral Applications Project,
USDA/APHIS/S&T/DWRC, Utah State University, Logan, Utah

DATE: June 6, 1991

SUBJECT: Request for burial of radioactive materials

The following information is submitted in support of a request to bury a small quantity of radioactive materials on the USDA Jornada Experimental Range:

Location: USDA/ARS, Jornada Experimental Range
Dona Ana County, New Mexico

Description of situation:

Pit: 3' wide, 30' long, and 8' deep. Materials will be buried with a minimum of 6' of overburden.

Fence: An area 40' by 80' around the pit will be fenced with metal "T" posts at 10-foot intervals with braces in 2 directions at each of the 4 corners. Four strands of barbed wire with no gates will be attached to the outside of the posts. Metal signs 8" x 12" with the radiation logo and "Radioactive materials" clearly visible will be securely attached to the fence on each of the four sides of the enclosure.

Hydro-geology: The area is in the sandy dune area on the eastern side of the Jornada Experimental Range. The water table in this vicinity is about 400' below the surface (based on a windmill driven well 2 miles to the east). A 10-12" layer of caliche (calcium carbonate layer above which evaporation exceeds percolation) is located 4' below the surface and some 2-3 feet above the buried materials. Leaching of materials should be negligible because of the arid nature of the environment and the layer of caliche.

Request for isotope burial
Page 2

Form of materials: Biologic materials comprised of:

- 48 adult Angora goats (est. wt. = 2,400 lbs)
- 20 kid goats (est. wt. = 150 lbs)
- 40 adult coyotes (est. wt. = 1,000 lbs)

Isotopes:

Isotope	Estimates in uCi		
	Goats	Coyotes	Total
⁵⁴ Mn	- -	7.2	7.2
⁶⁵ Zn	93.2	5.2	98.4
¹²⁵ I	- -	71.0	71.0
¹³⁴ Cs	81.0	5.0	86.0

Estimates of quantities made on the basis of following calculations:

Adult goats:

- Each marking collar = 2 reservoirs with 15 uCi ¹³⁴Cs each.
- 18 collars placed on goats.
- 1 collar (and goat) not recovered.
- 24 recovered with reservoirs intact (full).
- 4 collars recovered with 2 empty reservoirs.
- 7 collars recovered with 1 empty reservoir.
- 2 collars punctured by coyotes (3 reservoirs punctured).

- Total of 18 reservoirs punctured = 270 uCi ¹³⁴Cs dispensed.
- Previous studies indicate about 28% of fluid from 60 mL collars ends up contaminating carcasses of goat.
- Hence, expect 81 uCi (.30 x 270) ¹³⁴Cs to be on carcasses of adult goats.

Kid goats:

- Each marking collar = 2 reservoirs each with 33.3 uCi ⁶⁵Zn.
- 16 collars placed on kid goats.
- 29 collars recovered with reservoirs full.
- 1 collar recovered with 2 reservoirs empty.
- 2 collars recovered with 1 reservoir empty.
- 2 collars punctured by coyotes (3 reservoirs punctured).

- Total of 7 reservoirs punctured = 233 uCi ⁶⁵Zn dispensed.
- Previous studies indicate about 39% of fluid from 30 mL collars ends up on the carcass of the goat.
- Hence expect about 93.2 uCi ⁶⁵Zn (.40 x 233) to be on carcasses of kid goats.

68
38
34

72

Potential radioactive materials in coyote carcasses:

⁵⁴Mn (assuming captured coyotes ingested all unrecovered baits):

- 187 baits, each with 12.25 uCi ⁵⁴Mn, placed in field and not recovered (total of 2290.75 uCi).
- Due to blood absorption for Mn is 0.1 (229.075 uCi absorbed in coyote carcasses).
- Effective half life ⁵⁴Mn = 23 days.
- 1 February to 31 May = 120 days (3.2 effective half lives).
- 229 uCi x 3 eff. half lives = 7.16 uCi remaining in coyote carcasses.

¹²⁵I (assuming captured coyotes ingested all unrecovered baits):

- 188 baits, each with 2.0 uCi ¹²⁵I, placed in field and not recovered (total of 376 uCi).
- Due to blood absorption for I is 1.0 (376 uCi absorbed in coyote carcasses).
- Effective half life ¹²⁵I = 42 days.
- 1 February to 31 May = 120 days (2.86 effective half lives).
- 376 uCi x 2.3 eff. half lives = 71 uCi remaining in coyote carcasses.

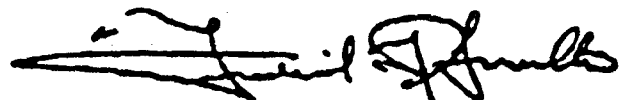
⁶⁵Zn (from collars punctured by coyotes):

- 3 reservoirs punctured by coyotes (total of 100 uCi ⁶⁵Zn dispensed during coyote attacks).
- Previous studies indicate on average coyotes ingest 3.2% of fluid from 30 mL collars.
- Hence coyotes estimated to ingest 3.2 uCi ⁶⁵Zn.

¹³⁴Cs (from collars punctured by coyotes):

- 3 reservoirs punctured by coyotes (total of 45 uCi ¹³⁴Cs dispensed during coyote attacks).
- Previous studies indicate on average coyotes ingest 11.1% of fluid from 60 mL collars.
- Hence coyotes estimated to ingest 3.0 uCi ¹³⁴Cs.

If additional information is needed in support of this request, please contact me by memorandum or telephone (801 - 790-2308).



Frederick F. Knowlton

"OFFICIAL RECORD COPY"

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(FOR LFMS USE)
 INFORMATION FROM LTS

BETWEEN:

LICENSE FEE MANAGEMENT BRANCH, ARM
 1110
 REGIONAL LICENSING SECTIONS

PROGRAM CODE: 03613
 STATUS CODE: 2
 FEE CATEGORY: EX 3L
 EXP. DATE: 19910228
 FEE COMMENTS: -----
 ::::::::::::::::::::::::::::::::::::::

LICENSE FEE TRANSMITTAL

A. REGION

1. APPLICATION ATTACHED

APPLICANT/LICENSEE: AGRICULTURE, DEPARTMENT OF
 RECEIVED DATE: 910701
 SOCKET NO.: 3034530
 CONTROL NO.: 114894
 LICENSE NO.: 19-00915-33
 ACTION TYPE: AMENDMENT

2. FEE ATTACHED

AMOUNT: \$ *Py* -----
 CHECK NO.: -----

3. COMMENTS

SIGNED *Robert J. Brown* -----
 DATE *2/28/91* -----

3. LICENSE FEE MANAGEMENT BRANCH (CHECK WHEN MILESTONE 33 IS ENTERED / /)

1. FEE CATEGORY AND AMOUNT: -----

2. CORRECT FEE PAID. APPLICATION MAY BE PROCESSED FOR:

AMENDMENT -----
 RENEWAL -----
 LICENSE -----

3. OTHER -----

SIGNED -----
 DATE -----