

MAY 09 1991

Docket No. 30-20934

License No. 37-23341-01

Commonwealth of Pennsylvania
Department of Environmental Resources
ATTN: Mr. Thomas Gerusky
Director, Bureau of Radiation Protection
P.O. Box 2063
Harrisburg, Pennsylvania 17120

Dear Mr. Gerusky:

Subject: Interstate Nuclear Services Corporation and the Royersford Waste
Water Treatment Facility

On May 1, 1991, M. Miller of the Region I Administrator's staff and I met with you and representatives of the Pennsylvania Department of Environmental Resources (DER) at the DER office in Harrisburg, Pennsylvania. One subject discussed during this meeting was the contamination of Royersford Waste Water Treatment Facility (RWTF) sludge with radioactive materials discharged by the Interstate Nuclear Services Corporation (INS) laundry. As you know, INS is licensed by the Nuclear Regulatory Commission (NRC) to launder radioactively contaminated clothing and other items at its facility in Royersford, Pennsylvania. As a result of these operations, the facility discharges water containing radioactivity into the Royersford sanitary sewer system. Processing of this waste water has resulted in the accumulation of sludge containing radioactivity at RWTF. You asked that I review the NRC position with regard to this matter. We continue to have no objection to disposal of the RWTF sludge in a landfill.

Our inspections of the activities of INS indicate that the radioactive material released from its Royersford facility to the sanitary sewer has been, and continues to be, within the applicable NRC regulatory limits. We have provided your office with copies of a report prepared by an NRC contractor, Oak Ridge Associated Universities, which concluded that the radiation doses resulting from the application of the RWTF sludge to agricultural land were small (less than 4 millirem per year to the maximally exposed individual). The RWTF has been using a landfill for disposal of the sludge since 1988. As stated in our letter dated October 25, 1988, we are willing to complete a similar analysis for disposal of the sludge in the landfill if the necessary data is provided. Based on our belief that the impact of disposal in the landfill would be similar to the agricultural spreading and our understanding that the Commonwealth also believed disposal in the landfill was of low impact (because they did not prevent it), we have not objected to this means of disposal.

The NRC has not exercised any regulatory authority with regard to the possession and subsequent disposal of this sludge by the RWTF in the past, and does not plan to exercise regulatory authority at this time. Since RWTF has begun to use a new method of dewatering the sludge, involving reed beds to minimize the volume of sludge, we are reviewing the use of the reed beds to determine whether action by NRC is necessary.

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MAY 09 1991

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We would also point out that since Pennsylvania is not an Agreement State, we have not relinquished authority over this radioactive material to the Commonwealth. NRC has the option to impose regulation of this radioactive material and has concluded such action is not necessary at this time.

I hope this discussion of the NRC position with regard to the disposal of the RWTF sludge is helpful. Please contact J. Kinneman of my staff if you need further information (215-337-5252).

Sincerely,

(SIGNED) MALCOLM R. KNAPP

Malcolm R. Knapp, Director
Division of Radiation Safety
and Safeguards

cc:

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MAY 09 1991

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J. Glenn, NMSS
M. Miller, RI
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