

Let's protect our earth



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DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF ENVIRONMENTAL QUALITY BUREAU OF ENVIRONMENTAL RADIATION

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September 2, 1987

Mr. John Kinneman
Chief, Nuclear Material Safety Section A
Division of Radiation Safety and Safeguards
U.S. Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Mr. Kinneman:

The Bureau of Environmental Radiation has reviewed Oak Ridge Associated Universities (ORAU) proposed radiological survey plan for Shieldalloy Corporation. The Bureau would like to see a systematic gamma survey of all property owned by Shieldalloy. Such a survey would serve to document the current radiological conditions of the site both inside and outside the controlled area. Specific comments follow:

1. Uncontrolled air effluent releases have been observed by Bureau personnel from Building 111 which are not monitored by the licensee. In order to obtain more information on this pathway, continuous air particulate samples should be taken at the fence line during the ORAU survey. The sample filters should be analyzed for gross alpha, gross beta as well as specific gamma emitting nuclides.
2. Water samples should not only be obtained from offsite wells and the boreholes drilled by ORAU, but also from the existing monitoring wells.
3. Clarification is needed in section IV B.2. Does "at least one 60 cm core will be obtained for each 1.5m auger flight" refer to the minimum amount of recovery or does it mean that only 40% of the flight will be sampled?
4. In section E, what radiation level will ORAU use to determine "inappropriate control of radioactively contaminated material"? The Bureau is concerned that the lack of a definitive screening level will result in some undocumented material. A screening level of all readings above background would be appropriate for this survey.

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5. Crushed ferro-columbium slag may have been shipped offsite as fill. Will the scope of this problem be addressed in this sampling plan, or is the NRC planning a mobile gamma scan or aerial radiometric flyover at a later time?

The Bureau plans to be present at the facility during the period ORAU will be conducting their survey. Notification of any changes in the current starting date of September 14, 1987 would be appreciated.

If you have any questions, please contact me at 609-530-4047.

Sincerely,

Duncan White

Duncan White, Radiation Physicist
Radiological Environmental
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DW:R9b/023

cc: J. Eng
J. Feeney