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May 3, 2007

Alexander Adams  
US Nuclear Regulatory Commission  
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One White Flint North  
11555 Rockville Pike  
Rockville, Maryland 20852-2738

RE: Records Required to be Forwarded to Nuclear Regulatory Commission (NRC) Region IV Office Prior to Termination of the University of Washington (UW) More Hall Annex Nuclear Reactor, License #73

Dear Mr. Adams:

In preparation for termination of the University of Washington's License #73, this letter addresses NRC requirements for the forwarding of records prior to termination of a license, and documents the manner in which the University has met these requirements.

There are five (5) applicable regulations concerning records transfer to the NRC prior to termination of a license. They are:

- 10CFR30.51(d) Prior to license termination, each licensee authorized to possess radioactive material with a half-life greater than 120 days, in an unsealed form, shall forward the following records to the appropriate NRC Regional Office: (1) Records of disposal of licensed material made under 20.2002 (including burials authorized before January 28, 1981), 20.2003, 20.2004, 20.2005 and (2) records required by 20.2103(b)(4).
- 10CFR30.51(f) Prior to license termination, each licensee shall forward records required by 30.35(g) to the appropriate NRC Regional Office.
- 10CFR40.61(d) Prior to license termination, each licensee authorized to possess source material, in unsealed form, shall forward the following records to the appropriate NRC Regional Office:
  - (1) Records of disposal of licensed material made under 20.2002 (including burials authorized before January 28, 1981), 20.2003, 20.2004, 20.2005 and
  - (2) Records required by 20.2103(b)(4).
- 10CFR40.61(f) Prior to license termination, each licensee shall forward the records required by 40.36(f) to the appropriate NRC Regional Office.

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- 10CFR70.51(a) Prior to license termination, each licensee authorized to possess source material, in unsealed form, shall forward the following records to the appropriate NRC Regional Office:
- (1) Records of disposal of licensed material made under 20.2002 (including burials authorized before January 28, 1981), 20.2003, 20.2004, 20.2005,
  - (2) Records required by 20.2103(b)(4), and
  - (3) Records required by 70.25(g).

The requirements of 10CFR30.51(d)(1), 10CFR40.61(d)(1) and 10CFR70.51(a)(1) are similar and addressed together. These regulations require the licensee to transfer records to the appropriate NRC Regional Office concerning the disposal of licensed material made under 10CFR20.2002 (including burials authorized before January 28, 1981), 20.2003, 20.2004 and 20.2005. The 10CFR20 regulations from the previous sentence address: (1) applications made to NRC for licensed material disposal in a manner not covered by regulations; (2) disposal of licensed material by release into sanitary sewerage; (3) treatment or disposal of licensed material by incineration; and (4) disposal of specific wastes as if they were not radioactive. The University of Washington More Hall Annex facility did not dispose of radioactive material per items 1, 3 or 4 from the above group. Liquid discharges to the sanitary sewerage system did occur. The discharges to the sanitary sewerage system were documented and reported to the United States NRC Document Control Desk in the annual reports. No releases of radioactive materials to the sewer occurred following final purging of reactor holding tanks in September of 1991. That final release was reported to the NRC Document Control Desk in the annual report dated January 28, 1992.

The record forwarding requirements of 10CFR30.51(d)(2), 10CFR40.61(d)(2) and 10CFR70.51(a)(2) are similar and may be addressed collectively. These regulations require a licensee to forward to the appropriate NRC Regional Office, prior to license termination, those records required by 10CFR20.2103(b)(4). 20.2103(b)(4) addresses records of the results of measurements and calculations used to evaluate the release of radioactive effluents, including those required under the standards for protection against radiation in effect prior to January 1, 1994. The results of effluent measurements were transferred to the United States NRC Document Control Desk via the More Hall Annex reactor annual report. There were no releases of radioactive effluents to the atmosphere of any kind following termination of reactor operations on June 30, 1988. That final release was reported to the NRC Document Control Desk in the annual report dated January 27, 1989.

The results of effluent measurements during decommissioning are included in the Final Status Survey report already transmitted to the United States NRC. No airborne or liquid radioactive materials were released during the decommissioning of the reactor facility.

Paragraph (1) of 10CFR30.35(g), 10CFR40.36(f) and 10CFR70.25(g) addresses records of spills or other unusual occurrences involving the spread of contamination in and around the facility, equipment or site. This information has been provided to the NRC in the Decommissioning Plan and the Final Status Survey Report. No further information needs to be transmitted to the NRC.

Paragraph (2) of 10CFR30.35(g), 10CFR40.36(f) and 10CFR70.25(g) addresses records to include as-built drawings and modifications of structures and equipment in restricted areas where radioactive materials are used/or stored and locations of possible inaccessible contamination such as buried pipes which may be subject to contamination. This paragraph

further allows that if drawings are not available, the licensee shall substitute appropriate records of available information concerning these areas and locations. The University of Washington has previously provided this information in the Decommissioning Plan and the Final Status Survey Report. The Final Status Survey Report includes information concerning radiological measurements of piping located below the facility floor. The Final Status Survey Report includes the results of all radiological measurements including buried pipe remaining in the facility.

Paragraph (3) of 10CFR30.35(g), 10CFR40.36(f) and 10CFR70.25(g) requires, except for specified areas, records to include a list contained in a single document and updated every two years, of the following: (i) all areas designated and formerly designated as restricted areas as defined under 10CFR20.1003; (ii) all areas outside of restricted areas that require documentation under 10CFR30.35(g)(1), 40.36(f)(1), or 70.25(g)(1)(regarding spills); (iii) all areas outside of restricted areas where current and previous waste have been buried as documented under 10CFR20.2108; and (iv) all areas outside of restricted areas that contain material such that, if the license expired, the licensee would be required to either decontaminate the area to meet the criteria for decommissioning in 10CFR20, Subpart E, or apply for approval for disposal under 10CFR20.2002. The above information was included in the Decommissioning Plan and the Final Status Survey Report. The termination of the license based on the results of the Final Survey contained in the Final Status Survey Report will negate the need for updated information every two years. There are no UW records related to item (ii) because there have been no spills outside the UW More Hall Annex research reactor. There are no UW records related to item (iii) because there have been no licensed materials wastes buried outside the UW More Hall Annex research reactor. There are no UW records related to item (iv) because there are no areas outside the UW More Hall Annex research reactor that require decontamination or application for disposal under 10CFR20.2002.

Paragraph (4) of 10CFR30.35(g), 10CFR40.36(f) and 10CFR70.25(g) addresses records of the cost estimate performed for the decommissioning funding plan, and records of the funding method used for assuring funds. The funding information was previously submitted to the NRC. No update to the cost estimate information should be necessary since the decommissioning of the facility is complete as documented in the Final Status Survey Report.

In summary, the records required by USNRC regulations to be forwarded to the appropriate Regional Office have been transmitted either as part of the annual reports or included in the Decommissioning Plan and/or the Final Status Survey Report. No onsite disposal of radioactive material occurred. If there are any questions regarding this letter, please contact Stanley Addison at (206) 543-4929.

Sincerely,



Stanley J. Addison, M.S.  
UW Radiation Safety Officer

I declare under penalty of perjury that, to the best of my knowledge, the forgoing is true and correct. Executed 05/03/07

Copy: Marty Howlett, Project Manager, Capital Projects Office  
Jeff Angeley, Associate Construction Manager, Capital Projects Office