

From: John Nicholson
To: Kevin Taylor
Date: Wed, Aug 22, 2007 10:04 AM
Subject: Re: Waste in drums

Kevin,

In addition to the NUREG 1757 reference I mentioned in my email yesterday I would also recommend you look at Federal Register Notice, Volume 67, No. 167, August 28, 2002, pages 55175-55179, "Transfers of Certain Source Materials by Specific Licensees". I think this would be directly applicable to what you are proposing to do. Hope this helps.

John

>>> "Kevin Taylor" <ktaylor@energysolutions.com> 08/16/2007 10:55 AM >>>
John:

We want to release the drums that are located on-site for off-site disposal as hazardous or potentially hazardous waste (due to TCE and some metals). Do we need to show more than the fact that the drums contain materials (mostly contaminated soils) with Th and U less than the approved DCGLs to release it for disposal? Any other limits less than the DCGLs would be determined by the disposal facility. In other words:

< DCGLs = OK with NRC

< disposal criteria = OK with disposal site / State regulations for hazardous waste disposal

We plan to use on-site in situ gamma spectroscopy to survey the drums along with an external survey for dose rates and removable contamination. Composite sampling has already indicated that most of the drums should be << DCGLs.

Comments / concerns / plans needed by NRC for approval?

Regards,

Kevin E. Taylor, PE, CHP
EnergySolutions, LLC
17 College St., Suite D
Greenville, SC 29601

864.235.3695 - office

864.235-8405 - fax

864.414.3831 - cell

ktaylor@energysolutions.com

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energysolutions.com
ktaylor (Kevin Taylor)

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