

From: "Aaron Gantt" <GANTTAA@dhec.sc.gov>
To: <rlb@nrc.gov>
Date: 09/25/2007 4:43:10 PM
Subject: Comments to the NRC IMPEP Review Report

Mr. Blanton,

Attached are the comments to the Draft NRC IMPEP Review Report for South Carolina. This letter contains comments for both Division of Radioactive Materials Licensing and Compliance and the Division of Waste Management. Also, this letter has an electronic signature by Mr. Hunter. The hard copy will be mailed to you over the next few days.

If you have questions regarding these comments, please contact Jim Peterson at 803-545-4407 and Richard Haynes at 803-896-4070.

Thanks

Aaron A. Gantt, Chief
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September 20, 2007

Richard L. Blanton
Health Physicist
Division of Materials Safety and State Agreements
Office of Federal and State Materials
and Environmental Management Programs
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Mr. Blanton:

The Department has received and reviewed the U.S. Nuclear Regulatory Commission's (NRC) July 16-20, 2007 draft Integrated Materials Performance Evaluation Program (IMPEP) report. The following are our comments addressing the technical and clerical accuracy of the report:

1. Page 1, paragraph two of the report identifies the Bureau of Radiological Health as the group administering the radioactive materials program. The Division of Radioactive Materials Licensing and Compliance (Division of Radioactive Materials) administers the radioactive materials program. This needs to be changed throughout the report where the term Bureau is used, including the appendices.
2. Page 1, paragraph two of the report identifies the Division of Radioactive Waste Management as the group responsible for oversight of the Barnwell radioactive waste disposal site. The Division of Waste Management is the proper name for the group. This needs to be changed throughout the report where the term Division of Radioactive Waste Management is used, including the appendices.
3. Page 1, paragraph four states that the Division of Radioactive Materials and the Division of Waste Management provided responses to the questionnaire on May 16, 2007 and June 26, 2007, respectively. Please correct to reflect that the Division of Radioactive Materials provided responses on June 26, 2007 and the Division of Waste Management provided responses on May 16, 2007.
4. Page 3, paragraph six states that the former Bureau Chief retired. The report should state that the former Bureau Chief has been replaced.
5. Page 13, paragraph one states that the high level of tritium was first detected in an on-site monitor well in 1974. This should be corrected to state the following: Tritium was first measured in the disposal trench sumps in 1974 and in on-site monitoring wells in 1978.
6. Page 13, paragraph one states that the Division of Waste Management action level is 13 mrem per year. This statement is technically incorrect. There is a contingency plan

in place that has a series of action levels based on tritium concentrations at the compliance point. The third and final action level, requiring construction of a pump and treat system, is reached when the tritium concentration exceeds 280,000 pCi/L, which correlates to 14 mrem/year.

7. Page 13, paragraph three states that the Assistant Director retired. This should be corrected to reflect that the Assistant Director accepted a position in another area of the Department.
8. Page 14, paragraph five states that several of the inspection finding letters were transmitted to the licensee prior to the Division of Waste Management Manager's review. The Division of Waste Management would like to clarify this observation. There were times when the Section Manager or Assistant Director both reviewed the report and signed the corresponding letter a day or two after the date on the letter, but in no instance was the letter transmitted prior to review of the corresponding report.

We thank the team for their comprehensive review of the South Carolina Agreement State Program. If you have any questions concerning these comments, please contact James Peterson at (803) 545-4400 or Richard Haynes at (803) 896-4070.

Sincerely,

A handwritten signature in black ink that reads "C. Earl Hunter". The signature is written in a cursive, flowing style.

C. Earl Hunter, Commissioner
SC Department of Health and Environmental Control

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