

APR 29 1983

FCML:DBH
(01121)
040-07344

General Electric Company
Re-Entry Systems Operations
ATTN: John R. McFadden
3195 Chestnut Street
Philadelphia, PA 19101

Gentlemen:

This refers to your letter dated March 25, 1983, (responding to our letter of March 9, 1983) providing additional information for the amendment of License No. SUB-831. As discussed in telephone conversations on April 14, 1983, and April 20, 1983, between myself and John McFadden, G. E., the following deficiencies were noted in your proposed air sampling program and additional information was requested to support your amendment request.

1. You set your action level of airborne radioactivity at the limit required to post the area as an "airborne radioactivity area" and indicated engineering controls would not be added below this action level. Your action level assumed that the milling area was the restricted area. However, your facility does not have either well-defined physical or ventilation barriers between the milling area and the rest of the track level to confine airborne contamination to the milling area. You should reevaluate your airborne radioactivity action level and address airborne radioactivity levels in both the restricted and unrestricted areas. Both areas are important when deciding if engineering controls are necessary.
2. When considering the need for engineering controls, you should also address your ALARA (as Low as Reasonably Achievable) guidelines for effluent releases to your unrestricted areas both on the track level and outside the building. We will accept your effluent release program as meeting the ALARA concept if you specify that your goal is to maintain concentrations in your effluent releases to within 1% of 10 CFR Part 20 limits and that whenever any of your effluent releases exceed this guideline, that you will perform an investigation or inquiry and then will take appropriate corrective actions to bring releases to within the 1% guideline. Please note that we have not changed the requirements for effluent concentrations, but we need documentation to show your program meets the ALARA concept.
3. What actions will be taken if your pilot study shows engineering controls are needed to reduce your effluent releases to the unrestricted area?

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4. Mr. McFadden indicated that the majority of workers on the track level are nonradiation workers. The permissible levels of airborne radioactivity in their work areas are governed by radioactivity in effluents to unrestricted areas. Effluent releases from the milling area need to be monitored at the boundary between the restricted area and the unrestricted area in addition to other potential "hot" spots. This boundary should be clearly defined on your diagram and air sampling should be performed at multiple points along it. Please note that common walkways, elevators, and lifts adjacent to the restricted area should be monitored carefully.
5. You have indicated that air sampling would be performed only during the pilot study and would cease once you establish you did not need engineering controls. The air monitoring program should be extended beyond the pilot study and into your production work stage (e.g., at least 6 months) to confirm the airborne activity levels during all stages of milling and cleanup are below your action levels.

Our review of your request will continue upon receipt of the above information. Please reply in duplicate and reference Mail Control No. 01121. If you have any questions, please contact Dr. Howe at (301)427-4228.

Sincerely,

Donna-Beth Howe, Ph.D.
Material Licensing Branch
Division of Fuel Cycle and
Material Safety

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