



December 20, 2007
696/CAL-4151

VIA EXPRESS DELIVERY SERVICE

Ms. Mary T. Adams (In Duplicate)
Fuel Cycle Licensing Branch/Section 1
U.S. Nuclear Regulatory Commission
Mail Stop T-8A33
Two White Flint North
11557 Rockville Pike
Rockville, MD 20852-2738

Subject: **Docket No. 70-734; SNM-696: Request to Release a Certain Portion of General Atomics Facility to Unrestricted Use and Delete it from License SNM-696: Namely, GA's "Underground Drain Line Piping Associated with the Former Building 31 Underground Liquid Radioactive Waste Tank"**

and

Dr. Ron Rogus (In Duplicate)
State of California
Department of Health Services
Radiologic Health Branch
Mail Stop 7610
1500 Capitol
Sacramento, CA 95814-0208

Subject: **Radioactive Materials License No. 0145-37: Request to Release a Certain Portion of General Atomics Facility to Unrestricted Use and Delete it from License 0145-37: Namely, GA's "Underground Drain Line Piping Associated with the Former Building 31 Underground Liquid Radioactive Waste Tank"**

Dear Ms. Adams and Dr. Rogus:

General Atomics (GA) is continuing its efforts directed at decontaminating, as appropriate, and obtaining the release to unrestricted use of selected facilities and land areas at General Atomics. GA has most recently completed the final radiological surveys of the remaining portions of underground drain line piping associated with a previously removed underground liquid radioactive waste tank that had been located near GA's Building 31.

In 1984, the radioactive liquid waste tank was removed from an area just outside room 101 of Building 31. The area where the tank had been located was subsequently released

to unrestricted use by both the Nuclear Regulatory Commission (NRC) (license amendment no. 59 dated August 12, 1999) and the State of California DHS/Radiologic Health Branch (State) (license amendment no. 140 dated September 10, 1999). At that time, the drain line piping leading to the tank was left in place.

In 2004, a portion of the subject drain line piping located within the "Phase IV" areas of the Building 30/31 complex was removed. The portion removed ran between the former sink and decontamination shower area in room 102A to the west wall of room 101 (i.e., the wall between rooms 102 and 101). No radioactive contamination was detected in soil samples collected from the bottom of the trench resulting from this drain line removal, and radiological measurements inside the trench were not distinguishable from normal background levels. The decommissioning of the "Phase IV" areas was documented in a report submitted to the NRC and the State in 2001¹. This report was revised in 2005, in part, to add the portion of the underground drain line removed in 2004² and, in part, to address questions/comments from the State. A copy of the revised Phase IV report and a copy of the corresponding letter are provided in Enclosure 1 of this letter for your reference. It is noted that the revised Phase IV report was initially sent only to the State in response to its questions/comments. While the State has the regulatory "lead" role on the Phase IV release request, GA is awaiting the release of the "Phase IV" area to unrestricted use by both the State and the NRC.

The remaining drain line piping associated with the former underground tank, which is the subject of this request, is shown in Figure 3 of the enclosed report (Enclosure 2). This piping consists of 2 short sections of pipe in room 103 and a longer 3" pipe going underneath room 103. These 3 sections all join at a point underneath the ~6' thick concrete wall that divides room 103 from room 101. Removal of these portions of the drain line piping is not reasonably feasible because of their depth (as far as 8'-9' below grade) and the high degree of difficulty of excavating them from under the concrete floor of the building and from under the 6'-thick concrete wall between rooms 103 and 101. Therefore, GA proposes to abandon this remaining piping in place.

The enclosed report (Enclosure 2) documents the results of: 1) the radiological measurements performed in the trenches/pits remaining after the recent excavation of portions of the piping and 2) survey measurements made inside the remaining piping intended to be abandoned in place. The results demonstrate the subject piping and

¹ Keith Asmussen Letter dated September 6, 2001 (CAL/696-3404), "Request to Release Certain Portions of General Atomics' Facility to Unrestricted Use and Delete them from its License: Namely, Building 30/31 - Phase IV".

² Dr. Keith Asmussen letter dated November 30, 2005 to Dr. Ronald Rogus (CAL-3940), "Response to Comments Re: GA's Final Survey Report for Phase IV area of Bldg 30/31 Complex and Submittal of Revised Building 30/31 Phase IV Report".

associated excavations meet the NRC- and State-approved criteria for release to unrestricted use.

Accordingly, GA is requesting that the abandoned underground drain line piping and the trench and excavated holes/pits associated with the efforts to locate, access and remove portions of the drain line piping, as described in the enclosed report, be released to unrestricted use and deleted from GA's NRC SNM and State Radioactive Materials licenses, numbers SNM-696 and 0145-37, respectively.

If you should have any questions regarding this request, or the enclosures, please don't hesitate to contact Ms. Laura Q. Gonzales at (858) 455-2758 or laura.gonzales@gat.com, or me at (858) 455-2823.

Very truly yours,



Keith E. Asmussen, Ph.D., Director
Licensing, Safety and Nuclear Compliance

Enclosure 1: Dr. Keith Asmussen letter dated November 30, 2005 to Dr. Ronald Rogus (CAL-3940) responding to State comments and questions, plus Revised Building 30/31 Phase IV Report.

Enclosure 2: "Final Radiological Survey Report of the Underground Drain Line Pipe Associated with the Former Building 31 Underground Liquid Radioactive Waste Tank", dated December 2007.

cc: Ms. Jackie E. Whitten, Chief, NMSS-B, Region IV
Mr. Robert Evans, Fuel Cycle Inspector, NRC Region IV
Mr. Jeff Wong, State of CA, Berkeley, CA
Ms. Barbara Hamrick, State of CA, Brea, CA