

MEMORANDUM FOR: Those on Attached List

FROM: Richard E. Cunningham, Director
Division of Industrial and
Medical Nuclear Safety, NMSS

SUBJECT: INSTRUCTIONS FOR DEALING WITH OAK RIDGE NATIONAL
LABORATORY (ORNL) LIST OF POTENTIALLY
CONTAMINATED SITES

The evaluation of approximately 17,000 retired licenses conducted by Oak Ridge National Laboratories has resulted in a preliminary list of 147 sites which appear -- on the basis of the information in the license files -- to have the potential for significant contamination. This list has been provided to the Regions. Of the 147 sites, 52 -- those with evaluation rankings above 300 -- are considered to have a potential for high enough contamination that they should be examined promptly to determine if there is an actual hazard. There is an additional list of 99 licenses which had significant sealed sources that are not clearly accounted for. The sealed sources will be dealt with at a later date.

The license files, and, in some cases, the inspection files for the 52 potentially contaminated sites are being shipped to the Regions from HQ and from ORNL. Enclosure 1 is a list of files being shipped from HQ. The other files are being shipped from ORNL. Copies of the ORNL evaluations are included in the licenses. While ORNL's methodology may require some further explanation, the evaluations should give some sense of how ORNL arrived at its conclusions. If any of the files are not received or if there are questions about them, please call Paul Goldberg on (301) 504-2631. Separately, IRM has sent a request to Records Liaison Officers in the Regions, asking them to locate and send to headquarters any files for the 147 licenses on the list. This instruction is being modified by IRM to direct the Regions to retain any files for the first 52 sites in view of the Regions' efforts on these sites.

We have checked the list of 52 sites in three ways to eliminate sites which are already being handled in some other fashion:

1. We have compared the list to DOE's list of sites under the Formerly Utilized Sites Remedial Assessment Program (FUSRAP). This has resulted in the elimination of three sites (pending Regional confirmation): the two National Lead sites (License numbers SNM-316 and SNM-686), which are part of DOE's Colonie, NY site, and the W. R.

Grace site (license number R-196) in Pompton Plains, N.J., which is part of the Wayne site under FUSRAP.

In addition, we have identified another site (Diamond

Alkali) which may be on EPA's Superfund National Priority List and one site (David Witherspoon) which is the subject of discussion between the State of Tennessee and the Department of Energy concerning responsibility for cleanup. This last site is only one of three on the license.

2. We also compared the list to the Site Decommissioning Management Plan (SDMP) list. This has resulted in the elimination of two sites from the list: Kerr-McGee, Cimarron (license number SMA-826) and AMAX (license number STB-440).

3. We are also comparing the 52 sites to the list of active sites in the License Tracking System. We will apprise you of the results of this effort when it is completed.

The Division of Low Level Waste Management and Decommissioning is responsible for the United Nuclear Corporation (UNC) license (license number SNM-368) as part of its review of UNC's decommissioning. This license does not require any additional action.

Therefore, of the 52 licensees, we believe that 6 have been eliminated from the need for detailed consideration. In addition, Region II should determine through contact with DOE and the state the status of the Witherspoon site in Knoxville, Tennessee; this may obviate any additional consideration for that site, although there are two additional Region III sites on the license. We will determine whether the Diamond Alkali site is on EPA's Superfund National Priority List and notify you of its status. We are requesting that the Regions take the following actions with respect to the sites:

1. Check the list against any additional documentation and institutional memory in the Regions (HQ is also looking for additional files and consulting collective memory) with a view to eliminating any sites which can easily be dismissed and collecting additional information about sites which will require additional assessment. If you find significant information bearing on the status of the site, such as closeout surveys and inspections, termination amendments, NRC letters certifying that the license can be terminated, or materials disposition, determine to what extent this resolves the questions about the site.

2. Determine whether there is any reason to question the findings of the three screenings done in HQ.

3. Notify HQ (Paul Goldberg) of any early results by June 30. If you see a need to take prompt action before June 30, notify HQ as early as possible. HQ and Regions can then discuss possible next steps: additional paper reviews,

calls to licensees, and onsite visits. We will plan a conference call and issue any necessary further guidance following that. Pending this, Regions should not do or plan any actions involving extensive staff resources, beyond those described here.

As noted above, we are focusing our efforts at this time on the 52 licenses that received scores of 300 or greater in ORNL's review. However, in the future, we will be looking at the remaining 95 licenses on the initial list. We will forward to you shortly the results of our screening for these 95 licenses. After you have completed your review of the high priority sites, we ask that you examine these 95 listed sites to determine if any of them can be eliminated from further consideration. This effort is clearly a second priority to addressing the first 52 sites, but your preliminary review should be complete by September 1.

IV. Additional Coordination

IMNS will consult with the Office of Public Affairs on how best to deal with any media or public inquiries about the project. This may include the development of a general response to inquiries. At this time, we are considering the list of sites which was provided to you to be predecisional and it should be treated accordingly.

IMNS will consult with the Office of State Programs on when and how to notify states of the assessment of sites. For any onsite activity, and perhaps even before that point, we will need to advise the states involved of the status of sites and coordinate our activities with them.

(original signed by John T. Greeves

for)

Richard E. Cunningham,

Director

Division of Industrial and
Medical Nuclear Safety, NMSS

Enclosure: As stated
cc: R. Bangart, LLWD
J. Austin, LLWD
Tim Johnson, LLWD
J. Kinneman, RI
C. Hosey, RII
R. Caniano, RIII
W. Holley, RIV
G. Yuhas, RV

Files sent to regions from HQ

David Witherspoon SUB-587 R's II and III (2 folders)

RI

Carborundum SNM-00214 (2 folders)

Westinghouse

 Blairsville SNM-00037

Ebasco SNM-00907

Martin-Marietta SNM-1192

Martin Co. SNM-00011

RIII

Allis-Chalmers SNM-237 (3 folders)

3M SNM-764

Diamond Alkali SNM-832

RIV

Spencer Chemical SNM-154

^Enclosure

Attached List for Memorandum Dated: June 22, 1992

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LABORATORY (ORNL) LIST OF POTENTIALLY CONTAMINATED
SITES

Richard W. Cooper, Director
Division of Radiation Safety and Safeguards, RI

J. Philip Stohr, Director
Division of Radiation Safety and Safeguards, RII

Charles E. Norelius, Director
Division of Radiation Safety and Safeguards, RIII

L. Joe Callan, Director
Division of Radiation Safety and Safeguards, RIV

Ross A. Scarano, Director
Division of Radiation Safety and Safeguards, RV