



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

October 8, 1991

Thomas D. Ferguson
Radiological Health Program
Maryland Department of the Environment
2500 Broening Highway
Baltimore, Maryland 21224

Dear Mr. Thompson:

On October 7, 1991, you sent me by facsimile a copy of the Neutron Products, Incorporated (NPI) August 9, 1989 request for approval of a radioactive waste compactor at its Dickerson, Maryland facility. I have reviewed the NPI request and provide the following comments.

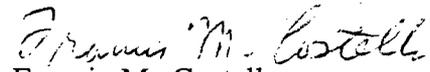
1. NPI should specify the location in the facility where the compactor will be used.
2. NPI should describe the safeguards which prevent the failure of a drum during compaction, including describing the equipment which provides the force to the piston, the method for limiting this force, and the specifications for the drums themselves,
3. A description of the material being compacted should be provided, including the amount of radioactivity in a drum and any restrictions on the types of material placed into a drum. Records should be maintained so that later, when a drum is sent for disposal, NPI will know what is in a given drum.
4. Air sampling in the "enclosed space" in which NPI plans to do the waste compaction should not be discontinued at NPI's discretion. The air sampling should continue until NPI collects a substantial amount of sampling data and submits this data to the State with a request to amend the license to permit the discontinuance of the sampling.
5. NPI should estimate the expected dose rates around the compactor and the associated HEPA filter and describe its plans to survey these areas for radiation and contamination. These surveys should be performed and recorded for each use of the compactor. If a high radiation area will be created by the compactor, NPI should describe its plans to control access to this area.
6. NPI should describe the procedure for changing the HEPA filter associated with the compactor.

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7. NPI should address whether there might be any liquids generated during the compaction process and what will be done to dispose of these liquids.

Please contact me if you have any questions about these comments.

Sincerely,



Francis M. Costello

Acting Regional State Agreements Officer

cc: Roland Fletcher, State of Maryland
Vandy Miller, SP