

From: Scott Flanders  
Sent: Friday, March 21, 2008 11:49 AM  
To: 'sjablons@tceq.state.tx.us'  
Cc: Anna Bradford; David Brown; Larry Camper  
Subject: WCS SNM License condition

Susan,

My staff has reviewed the proposed sealed source wipe authorization described in your e-mail to Larry Camper dated March 18, 2000, at 11:40 AM.

We understand that Waste Control Specialists LLC (WCS) plans to receive a sealed source isotope safe from the U.S. Department of Energy's Waste Isolation Pilot Plant for storage and macroencapsulation. The 2000 pound safe contains ten sealed sources of special nuclear material (SNM), and one of the plutonium-239 sources is leaking. WCS proposes to receive the safe and the sources contained therein in a B-25 box, macroencapsulate the safe by opening the safe while it is still in the box, and fill both the safe and the box with concrete. We understand the safe will be elevated in the box to ensure full encapsulation. The safe will be shipped to the Nevada Test Site (NTS) for disposal. The inventory of the safe will be verified by NTS personnel and the macroencapsulation procedure will be monitored by NTS personnel.

Related to this action, WCS requested approval from the Texas Commission on Environmental Quality by letters dated August 7, 2007, and September 21, 2007, to perform wipe tests of the SNM sealed sources as an acceptable method of meeting the confirmatory sampling requirement of License Condition 19.A.(7) of TCEQ radioactive materials license (RML) R04971. The TCEQ requirement for confirmatory sampling is a condition of the NRC Order dated November 5, 2004, that grants an exemption from the requirements of 10 CFR Part 70, which has been incorporated into RML R04971.

In support of its request, WCS makes a compelling case that wipe samples are the only kind of sampling that can reasonably be performed on a sealed source. Further WCS requests that this approval be granted on a "one-time" basis.

In response to WCS' request, TCEQ proposes to add a time-limited authorization to condition 19.A.(6) that reads:

"Sealed sources containing SNM from the Waste Isolation Pilot Plant facility, as described in the letters dated August 7, 2007 and September 21, 2007, can be sampled using a wipe test of each source combined with the generators written certification. This

authorization expires within 2  
months of the issuance of amendment 45."

On the basis of the foregoing facts, We agree that the use of wipe tests  
of each source, in the  
manner described in the proposed new Condition of RML 04971 (above),  
meets the intent of the  
Condition of NRC's Order dated November 5, 2004.

Please let me know if you need any further information.

Thanks Scott

E-mail Properties

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Options

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