

June 30, 2008

Todd J. Jackson, CHP US Nuclear Regulatory Commission 475 Allendale Road King of Prussia, PA 19406-1415

SILVE JUL PARTY STILL

9-6 MS-16

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Control No. 136636 Dear Mr. Jackson,

Docket No. 04008940

I am writing in response to your letter dated June 26, 2008 regarding the review of our proposed decommissioning plan. I would like to respond to each of the comments in your letter in order.

STB-1504

1. Background Measurements

We agree to obtain a minimum of ten (10) background measurements from the reference area.

2. Survey Locations

We agree to determine all survey locations by using a set of two random numbers, one representing the x axis and the other the y axis.

3. MDC Calculation

The Static Minimum Detectable Concentration (MDC) will be calculated using the following equation obtained from NUREG-1757, Vol. 2, Section A.5.1, p. A-10.

 $MDC_{static} = \frac{3 + 4.65 (B)^{1/2}}{K x t} \qquad x \quad \frac{100 cm^2}{100 cm^2}$

Where $K = \varepsilon_i x \varepsilon_s x A$

t = time interval of the observation

B = background counts in time t

 ε_i = instrument efficiency for emitted radiation

 ε_s = source efficiency in emissions/disintegration

A = probes sensitive area

MSS/RGNI MATERIALS-002

"where quality comes first"

Assuming a background of 300 cpm, an instrument efficiency of 13.2%, a source efficacy of 0.521, and a count time of 10 minutes, the MDC works out to be 297 dpm/100 cm².

Some floor areas are covered in a layer of paint which will introduce an additional correction factor to this equation. It was determined that the paint in 5-7 mils thick and at its maximum thickness would shield 34.55% of the beat radiation from Th-232. Adding this correction factor, the MDC for a 10-minute count would be 454 dpm/100 cm². Counting pained areas for 23 minutes would drop the MDC to 298 dpm/100 cm²

Based upon these calculations we agree to use a counting time which is long enough to ensure the MDC below 300 dpm/100 cm^2 .

The responses outlined above will be incorporated into our final site survey plan. Once the plan is approved, we will contact you to inform you of our proposed survey schedule.

Sincerely,

Tiphen Krowt

L. Stephen Prout President