

DRAFT DRAFT DRAFT DRAFT DRAFT DRAFT DRAFT

Docket No. 030-20934

License No. 37-23341-01

Interstate Nuclear Services
ATTN: Michael J. Bovino, CHP
 Manager, Health Physics and Engineering
295 Parker Street
P. O. Box 51957
Springfield, Massachusetts 01151

Dear Mr. Bovino:

We have reviewed the document submitted with your letter dated May 29, 1992 "Radiological Impacts of Effluent Releases to the Atmosphere and to the Sanitary Sewer from Interstate Nuclear Services" for your facility in Morris, Illinois. We understand that you will perform a similar pathway analysis for releases from Royersford facility, and that you will incorporate the following comments from our review of this document:

1. Section 6.0 should include a) exposure to employees at the Royersford Wastewater Treatment Facility (RWTF) from sludge in the reed beds, application of sludge to the reed beds, and fall harvest of the reeds; b) exposure to personnel during removal of sludge from the reed beds after a five to ten year accumulation period; and c) exposure resulting from the disposal of sludge at a public landfill.
2. Where possible, data from real measurements and analyses should be used to determine the concentration of isotopes in the sludge.
3. Since the RWTF currently dewateres sludge by both mechanical dewatering and by drying in the reed beds, a comparison of the doses from the two methods should be performed to determine which route produces the higher exposure to the maximally exposed individual.
4. Since INS has applied for a permit from the Pennsylvania Department of Environmental Resources to make releases directly from its facility to the river, an analysis of this pathway should be included as performed in Section 6.10.
5. Strontium-90 should be included as an isotope of concern at this facility.
6. Specify the time interval used to determine the annual average concentrations listed in Tables 9.1 and 9.2 in the Royersford analysis.

DRAFT DRAFT DRAFT DRAFT DRAFT DRAFT DRAFT

bcc:
Region I Docket Room (w/concurrences)
J. Kinneman, RI
M. Banerjee, RI
E. Ullrich, RI

RI:DRSS
Ullrich/lp

8/ /92

RI:DRSS
Kinneman

8/ /92

RI:DRSS
Banerjee

8/ /92

DRAFT DRAFT DRAFT DRAFT DRAFT DRAFT DRAFT

Thank you for your cooperation in this matter. If you have any further questions, please contact me or Betsy Ullrich.

Sincerely,

John Kinneman, Chief
Research, Development &
Decommissioning Section

cc:
Public Document Room (PDR)
Nuclear Safety Information Center (NSIC)
Commonwealth of Pennsylvania

Commonwealth of Pennsylvania
Department of Environmental Resources
ATTN: Ivna Shanbaky
1875 New Hope Street
Norristown, Pennsylvania 19401

Commonwealth of Pennsylvania
Department of Environmental Resources
ATTN: Margaret Reilly
P. O. Box 2063
Harrisburg, Pennsylvania 17120

Borough of Royersford
Royersford Wastewater Treatment Facility
ATTN: Michael Clafflin, Superintendent
300 Main Street
P. O. Box 188
Royersford, Pennsylvania 19468