

## **Hayes, John**

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**From:** Couture, Gerard F. [CouturGF@westinghouse.com]  
**Sent:** Saturday, May 08, 2010 8:52 AM  
**To:** Hayes, John  
**Cc:** Michelsen, Mark A; Williamsdnick@aol.com  
**Subject:** HDP DP ITEMS

Jack,

As I have mentioned in a previous call, HDP is actively working on finalizing the remaining procedures and work packages to perform work once the DP has been approved. As with any large document, this has resulted in the identification of editorial comments, points that could be better clarified, and slight changes in the text and tables within the various DP chapters. HDP licensing is maintaining a living file of these items in anticipation of correcting them in the DP when we submit revised pages generated in response to RAIs received by the department. We will of course note these in a change log file to ensure you are aware of them. During this ongoing effort, licensing is further evaluating these items to determine if they warrant informing NRC before receipt of the RAIs. The following three items fall into this latter category and are provided for your information.

### **Comments on DP Resolution-Recommend Informing NRC**

#### **DP page 14-14 (pdf page 650)**

**Comment:** *No area factors for total Uranium are presented in Table 14-12*

**Licensing Response:** Reviewer is correct, DP Chapter 4, Table 14-12 presents area factors for uranium isotopes and not total uranium. On the previous page 14-13, the following verbiage is also found, "Table 14-12 also provides AFs for total Uranium for surface soil in the Plant Soil SEA, Tc-99 SEA, and Burial Pit SEA that correspond to the calculated U-235 enrichment". This is also not true. However the formula for calculation is correct and the DP user would be able to successfully calculate an AF for total uranium using the guidance and formula presented in DP Chapter 14. Omission of the calculated total uranium AF in Table 14-12 should be identified to the Regulator. Issue will be corrected when document undergoes revision in response to RAIs.

Recommend informing NRC, and correcting DP to include total Uranium Area Factors during RAI phase.

#### **DP Table 14-10 (pdf page 743)**

**Comment:** *This value should be 204.8 and not 208.4.*

Reviewer is correct, DCGL specified for measurement of U-234 in uniform soils is 204.8 pCi/g as listed in Table 14-4 versus the value of 208.4 pCi/g listed in Table 14-10. This will be brought to the attention of the Regulator as the incorrect value is more conservative than the true value and corrected when the document is revised for RAI response.

Recommend informing NRC and correcting during RAI response.

#### **DP Figures 14-4, 14-5, 14-6 (pdf pages 774-776)**

**Comment:** *Use(d) the old terminology for this figure for CSM*

Figure 14-4 is presented as an illustration of the lack of sensitivity of Total Uranium soil DCGLs to Uranium enrichment. The sensitivity analysis results are for the old models and the old DCGL. This figure, as well as similar figures 14-5 and 14-6, will be corrected to use current terminology and DCGLS.

Recommend updating figures to current CSM terminology and DCGLs and inform NRC.

Gerry

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