From: Williams, David
To: Modes, Kathy
Cc: Siegrist, Hank; Hay, Scott; Mark.Maiello@pfizer.com
Subject: Pfizer - response to questions
Date: Monday, April 22, 2013 2:44:49 PM

Kathy,

Per my communication with Hank, we have the following responses to your questions we discussed this AM. Please let us know if you need anything else; we wait your approval.

Thanks – Dave

1) Is the work at the site considered Group 2 or 3?

The Pfizer project is considered a Group 2 Decommissioning (Unrestricted Release Using Screening Criteria, No Decommissioning Plan Required). Group 3 Decommissioning would require a license amendment to authorize the activities for decommissioning. The Pfizer facility will meet the screening criteria prior to unrestricted release, but a Decommissioning Plan does not need to be submitted, and the Pfizer license does not need to be amended to modify or add to existing procedures since the Cabrera license will be activated using existing procedures in order to support renovation activities for this project.

2) Will the disposal of waste be in accordance with 10 CFR 20.1404?

The facility is expected to be released for unrestricted use as defined in 10 CFR 20.1402. Since Cabrera will not be releasing the site, the requirements listed in 10 CR 20.1402 do not apply to the work Cabrera will be performing under our license. Cabrera is responsible for removal and disposal of solid materials and equipment with residual activity levels exceeding the limits established in Regulatory Guide 1.86 for release of solid materials by non-reactor licensees. All solid materials with activity levels less than the limits established in Regulatory Guide 1.86 will be transferred to Pfizer along with all measurement results supporting the decision that disposal as radioactive waste was not required, and Pfizer will determine the final disposition of this solid material as well as the final release of the facility for unrestricted use. Cabrera will also perform measurements on building surfaces to provide Pfizer with information on radionuclide concentrations associated with building surfaces to support decisions concerning the necessity for remediation prior to unrestricted release. Because the radionuclides of concern are hydrogen-3 and carbon-14, the screening criteria corresponding to 25 mrem/y TEDE are significantly higher than the limits for total and removable activity established in Regulatory Guide 1.86. Therefore, the results of the renovation activities are expected to result in activity levels on solid materials that are ALARA and less than 25 mrem/yr, meeting the requirements for unrestricted release in 10 CR 20.1402. All low-level radioactive waste shipments will be packaged, surveyed, transported, and disposed of in accordance with all Federal, State, and local requirements, including complying with waste

acceptance criteria for the disposal facility.

3) Will the work at the site be conducted in accordance with MARSSIM?

Cabrera will be using as much guidance from MARSSIM and MARSAME as practical for this project. The survey results are expected to be technically defensible based on MARSSIM and MARSAME guidance. However, some adjustments had to be made to a MARSSIM default survey approach because one of the radionuclides of concern is hydrogen-3. Hydrogen-3 emits a low-energy beta particle that cannot be measured by scanning using available instrumentation. Therefore, scanning was performed for carbon-14 but the number of measurements on building surfaces in Class 1 areas was increased to account for the inability to scan for hygrogen-3. This is a non-standard approach to survey design that is discussed in MARSSIM Appendix D (page D-23).

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