

Phase II Final Status Survey Report Mallinckrodt Columbium-Tantalum Plant

St. Louis, Missouri

Chapter 13

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ABBREVIATIONS AND ACRONYMS

%	percent
σ	sigma; standard deviation
AECOM	AECOM Technical Services
bgs	below grade surface
C-T	columbium-tantalum
CFR	Code of Federal Regulations
DCGL	derived concentration guideline level
DP	decommissioning plan
DQO	data quality objectives
EMC	elevated measurement comparison
FSS	Final Status Survey
FSSR	Final Status Survey Report
ft	feet
GWS	gamma walk-over survey
m ²	square meters
MARSSIM	Multi-Agency Radiation and Site Investigation Manual (NUREG-1575)
MDC	minimum detectable concentration
NIST	National Institute of Standards and Technology
NRC	U.S. Nuclear Regulatory Commission
pCi/g	picoCuries per gram
Ra	radium
SOF	sum of fractions
Th	thorium
U	uranium
VCP	vitriified clay pipe
WRS	Wilcoxon Rank Sum

13.0 RESULTS SUMMARY FOR PLANT 5 SUBSURFACE SU07

This chapter of the Final Status Survey Report (FSSR) presents the results of the final status survey (FSS) and data assessment for Plant 5 subsurface survey unit SU07 in accordance with Columbium-Tantalum (C-T) Phase II Decommissioning Plan (DP) Section 14.5. The FSS for this Class 1 survey unit was completed by AECOM Technical Services (AECOM) in October 2011. The SU07 data assessment was performed based on the assumptions, methods, and performance criteria established to satisfy the data quality objectives (DQOs) in accordance with the C-T Phase II DP Section 14.4.3.8. The summary statistics provide numerical values for measures of central tendency (i.e., mean, median), variation (i.e., standard deviation), and spread (i.e., minimum, maximum). Data evaluation and statistical analyses were performed and a separate decision was made for each survey unit of the C-T Plant as to its suitability for release for unrestricted use based upon the industrial use scenario release criterion as established in C-T Phase II DP Chapter 5.

13.1 OVERVIEW

SU07 is a Class 1 survey unit located in the central portion of C-T Plant 5. The survey unit is approximately 577 square meters (m²) in size, which is less than the size limit of 3,000 m² for Class 1 survey units for subsurface material (per C-T Phase II DP, Table 14-4). Class 1 was the appropriate classification because the survey unit contained residual radioactivity that exceeded the DCGL_w prior to remediation. Figure 13-1 shows the location of SU07 within the Plant 5 area.

Figure 13-2 is a photograph of SU07 that was taken during the FSS, following remediation. The eastern edge of the survey unit is a vertical wall barricaded from the 7th Street roadway. The southern boundary was moved north between 6 and 13 feet (ft) to account for material along the southern edge of the existing excavation that could not be removed without undermining higher elevations—the excluded area was evaluated as part of survey units SU16 and SU17. Soil and related debris were removed from the area to an excavated depth range of approximately 9 to 16.5 ft below grade surface (bgs).

A vitrified clay pipe (VCP) containing contaminated material was discovered running north-northeast through AECOM grids C7, C6, and D6 at approximately 16.5 ft bgs. Several lines of “wood pipes” (pipelines made of 4 ft diameter by 12 ft long timbers) also crossed the area. The VCP and “wood pipes” were historic sewer remnants from past site development, were not related to the C-T manufacturing buildings, and were removed during remediation.

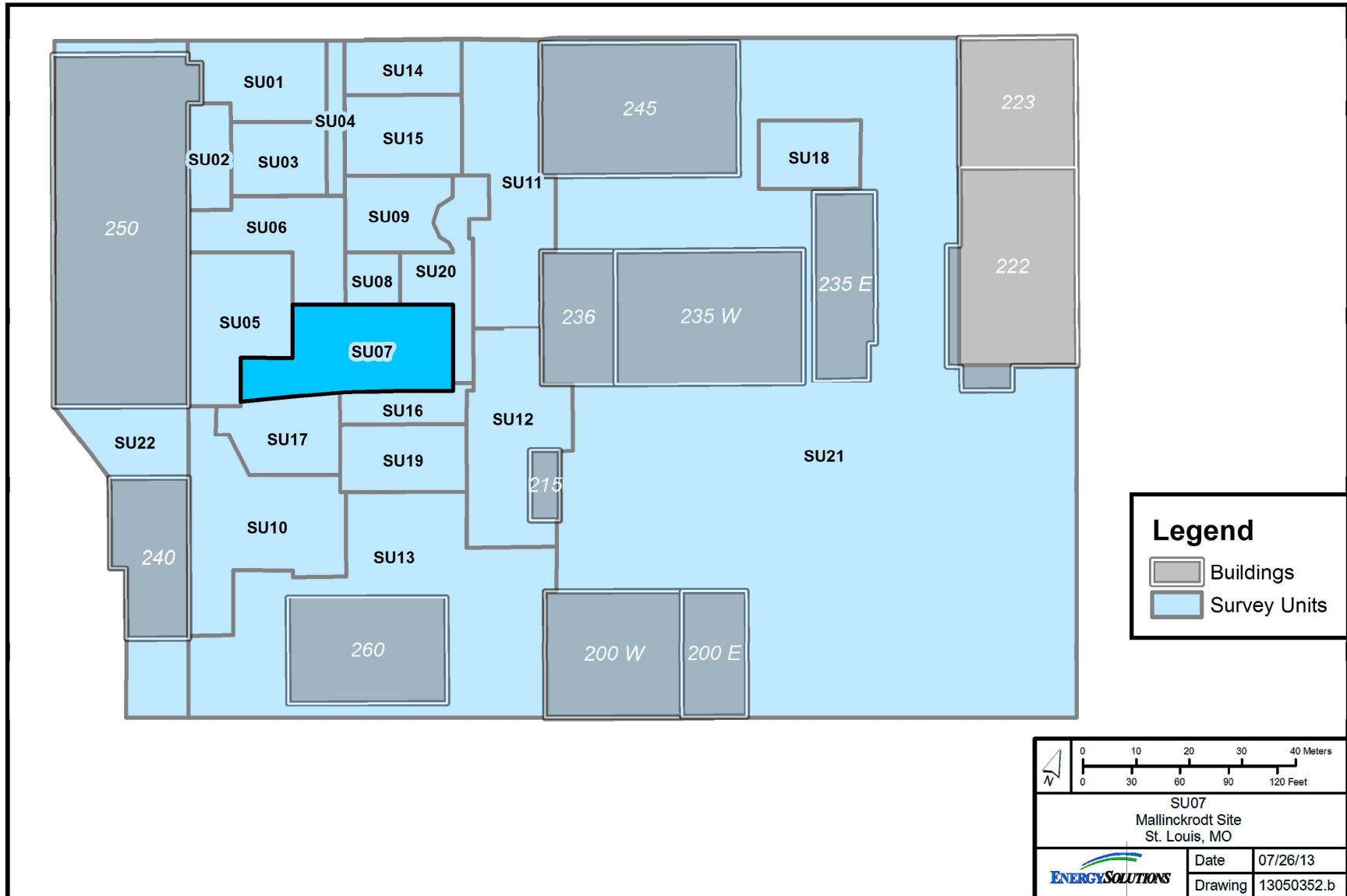


Figure 13-1 Location of Subsurface SU07 in C-T Plant 5



Figure 13-2 Photograph of SU07 Looking West toward East Side of Building 250

13.2 REMEDIAL ACTION AND RADIOLOGICAL SAMPLING SUMMARY

Post-remediation soil sampling, shown in Figure 13-3, was performed by AECOM after GWS indicated successful remediation. The soil sampling demonstrated that the survey unit was ready for FSS and included: 1) “Grid + Step-Out Sampling”, 2) VCP removal verification sampling, and 3) “At-Depth (Auger) Sampling.” All post-remediation soil samples were analyzed at the on-site laboratory only. Table 13-1 provides the results for the 29 “Grid + Step-Out” samples. Table 13-2 provides the results for the five VCP removal verification samples. Table 13-3 provides the results for the seven “At-Depth (Auger)” samples were taken from AECOM grids B7, C6, and C7. AECOM grids D6, D7, E6, and E7 were excavated down to a depth of 16 ft bgs and additional at-depth (auger) samples were not required.

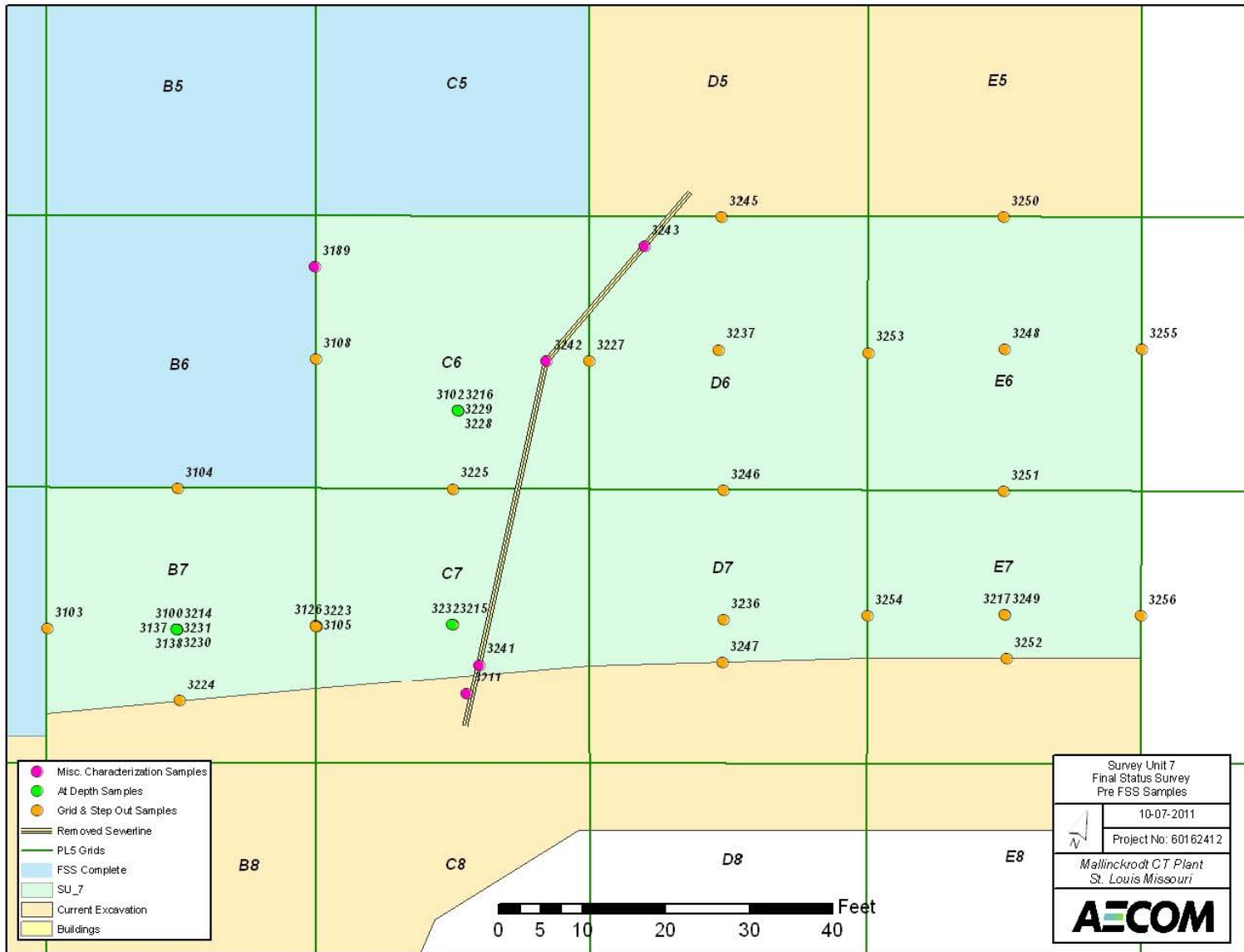


Figure 13-3 Post-Remediation Soil Sampling Locations

Table 13-1 “Grid + Step-Out Sampling” Analytical Results

Sample ID	Collection Date	On-Site Results			Gross SOF
		Concentration (pCi/g)			
		²³² Th	²²⁶ Ra	²³⁸ U	
3100	08/23/11	1.30	1.99	3.42	0.13
3102	08/23/11	1.54	4.39	3.39	0.22
3103	08/24/11	1.45	2.01	2.56	0.13
3104	08/24/11	1.55	2.93	3.55	0.17
3105	08/24/11	3.21	8.77	20.00	0.47
3108	08/24/11	1.86	4.88	5.30	0.25
3126	08/27/11	1.47	2.17	10.33	0.15
3214	09/23/11	1.41	3.61	3.03	0.19
3215	09/23/11	1.20	3.01	9.32	0.17
3216	09/23/11	1.17	4.53	7.90	0.22
3217	09/23/11	1.50	7.74	9.07	0.34
3223	09/27/11	4.04	3.98	16.98	0.33
3224	09/27/11	2.14	5.28	5.12	0.28
3225	09/27/11	1.61	3.45	5.32	0.19
3227	09/27/11	1.66	0.74	9.32	0.11
3236	09/29/11	0.74	1.56	1.52	0.09
3237	09/29/11	0.80	2.48	1.43	0.12
3245	10/06/11	0.82	1.13	3.36	0.08
3246	10/06/11	0.94	1.36	1.47	0.09
3247	10/06/11	1.14	3.03	7.44	0.16
3248	10/06/11	1.09	1.85	2.16	0.11
3249	10/06/11	0.82	9.25	8.20	0.36
3250	10/06/11	8.95	7.54	7.72	0.64
3251	10/06/11	1.34	4.23	19.59	0.23
3252	10/06/11	0.83	9.00	11.08	0.36
3253	10/06/11	2.02	8.43	24.09	0.41
3254	10/06/11	1.13	8.84	14.20	0.37
3255	10/06/11	1.09	1.88	1.22	0.11
3256	10/06/11	1.85	15.01	32.08	0.64

Table 13-2 VCP Removal Verification Sampling Analytical Results

Sample ID	Collection Date	On-Site Results			Gross SOF
		Concentration (pCi/g)			
		²³² Th	²²⁶ Ra	²³⁸ U	
3189	09/13/11	1.31	2.46	16.00	0.16
3211	09/20/11	1.96	6.10	14.54	0.31
3241	10/05/11	1.45	5.52	11.25	0.27
3242	10/05/11	1.28	2.25	2.99	0.13
3243	10/05/11	1.20	2.65	4.12	0.15

Table 13-3 “At-Depth (Auger) Sampling” Analytical Results

Sample ID	Collection Date	On-Site Results			
		Concentration (pCi/g)			Gross SOF
		²³² Th	²²⁶ Ra	²³⁸ U	
3137	08/30/11	1.06	1.61	3.95	0.11
3138	08/30/11	1.20	1.88	4.59	0.12
3228	09/28/11	1.02	1.44	3.14	0.10
3229	09/28/11	1.13	1.61	0.88	0.10
3230	09/28/11	1.11	1.74	2.38	0.11
3231	09/28/11	1.20	2.09	1.90	0.12
3232	09/28/11	0.94	1.14	2.35	0.08

13.3 DATA COLLECTION

Data collection was performed based on the assumptions, methods, and performance criteria established to satisfy the DQOs in accordance with the C-T Phase II DP, Sections 14.4.1 and 14.4.3. Details regarding FSS design and quality assurance and quality control applicable to all survey units were discussed in Chapters 4 and 5, respectively, of this FSSR.

13.3.1 Gamma Scans

A gamma walk-over survey (GWS) was performed over 100% of the excavated area to locate radiation anomalies that might indicate areas with elevated residual radioactivity where further data collection (i.e., biased soil sampling) was warranted.

13.3.2 Soil Sampling

Soil samples to be used for the statistical test were collected at a frequency and at representative locations throughout SU07 such that a statistically sound conclusion regarding the radiological condition of the survey unit could be developed. Additional biased soil samples were also collected at locations of elevated residual radioactivity identified by GWS. Figure 13-4 provides the GWS results and soil sampling locations. A total of 17 (15 systematic and 2 GWS biased) soil samples were collected over the areal footprint SU07.

All soil samples were analyzed on site via gamma spectroscopy analysis. Table 13-4 provides the sample results and summary statistics for the 15 systematic samples. Table 13-5 provides the sample results for the 2 GWS biased samples.

Any remaining sieved material from each sample was analyzed separately to verify residual radioactivity was consistent with sample results. The radiological screening process did not identify any significant levels of radioactivity in the sieved materials removed from samples.

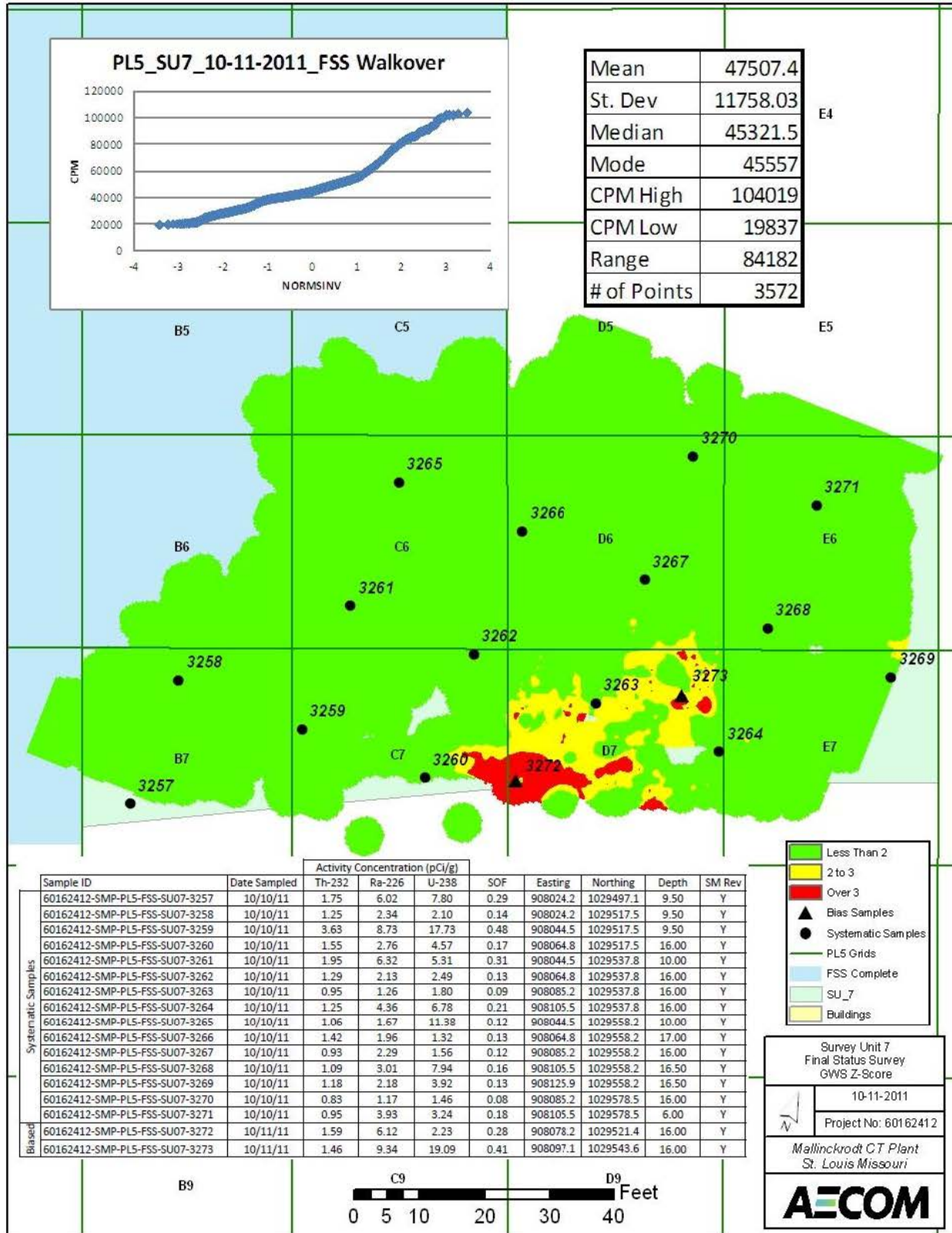


Figure 13-4 GWS and Soil Sampling Locations

Table 13-4 Gamma Spectroscopy Systematic Sample Analytical Results

Sample ID	Depth (ft bgs)	On-Site Results											Off-Site Results ^a											On-Site/ Off-Site Gross SOF Ratio	
		Concentration (pCi/g)									SOF		Concentration (pCi/g)									SOF			
		²³² Th			²²⁶ Ra			²³⁸ U					²³² Th			²²⁶ Ra			²³⁸ U						
		Result	Uncert. (2σ)	MDC	Result	Uncert. (2σ)	MDC	Result	Uncert. (2σ)	MDC	Gross	Net ^b	Result	Uncert. (2σ)	MDC	Result	Uncert. (2σ)	MDC	Result	Uncert. (2σ)	MDC	Gross	Net ^b		
3257	9.5	1.75	0.30	0.12	6.02	1.52	1.07	7.80	1.70	1.01	0.29	0.14	1.98	0.38	0.28	3.38	0.45	0.08	3.72	0.48	0.08	0.20	0.06	1.42	
3258	9.5	1.25	0.24	0.08	2.34	0.96	0.69	2.10	1.07	0.68	0.13	0.00	1.48	0.37	0.32	2.51	0.34	0.08	2.66	0.35	0.09	0.15	0.01	0.89	
3259	9.5	3.63	0.48	0.21	8.73	2.38	1.74	17.73	2.27	1.20	0.47	0.33	3.36	0.70	0.54	7.15	0.96	0.14	7.44	0.95	0.15	0.39	0.25	1.20	
3260	16	1.55	0.22	0.10	2.76	1.15	0.85	4.57	0.97	0.63	0.17	0.02	1.72	0.43	0.36	2.12	0.31	0.09	2.29	0.34	0.10	0.15	0.02	1.12	
3261	10	1.95	0.40	0.13	6.32	1.43	0.96	5.31	1.47	0.90	0.30	0.16	2.48	0.49	0.36	6.13	0.80	0.09	6.80	0.86	0.10	0.32	0.18	0.95	
3262	16	1.29	0.25	0.06	2.13	0.89	0.63	2.49	1.04	0.66	0.13	0.00	1.52	0.37	0.31	1.41	0.21	0.08	1.70	0.25	0.09	0.11	0.01	1.14	
3263	16	0.95	0.23	0.06	1.26	0.76	0.55	1.80	0.91	0.55	0.09	0.00	1.04	0.27	0.23	0.77	0.14	0.17	0.73	0.13	0.07	0.07	0.00	1.21	
3264	16	1.25	0.25	0.05	4.36	1.26	0.90	6.78	1.54	0.86	0.21	0.07	0.80	0.34	0.34	1.43	0.24	0.09	1.57	0.23	0.10	0.08	0.00	2.49	
3265	10	1.06	0.20	0.06	1.67	1.53	1.21	11.38	1.47	0.74	0.12	0.01	1.35	0.32	0.17	1.20	0.17	0.06	1.27	0.18	0.06	0.10	0.00	1.18	
3266	17	1.42	0.25	0.11	1.96	0.90	0.65	1.32	0.92	0.62	0.13	0.00	1.35	0.34	0.26	1.39	0.22	0.07	1.69	0.24	0.07	0.11	0.00	1.21	
3267	16	0.93	0.18	0.03	2.29	0.87	0.56	1.56	0.74	0.49	0.12	0.00	0.97	0.31	0.27	1.60	0.22	0.07	1.85	0.25	0.08	0.10	0.00	1.22	
3268	16.5	1.09	0.25	0.07	3.01	1.15	0.84	7.94	1.51	0.81	0.16	0.02	1.35	0.34	0.29	1.20	0.21	0.08	1.39	0.21	0.08	0.10	0.00	1.60	
3269	16.5	1.18	0.17	0.06	2.18	0.99	0.73	3.92	1.10	0.66	0.13	0.00	1.40	0.34	0.31	1.15	0.19	0.08	1.13	0.18	0.09	0.10	0.00	1.30	
3270	16	0.83	0.19	0.06	1.17	0.80	0.61	1.46	0.97	0.62	0.08	0.00	1.09	0.23	0.20	1.45	0.21	0.06	1.65	0.22	0.06	0.10	0.00	0.79	
3271	6	0.95	0.26	0.09	3.93	1.25	0.88	3.24	1.14	0.73	0.18	0.05	0.97	0.29	0.27	3.06	0.41	0.07	3.49	0.45	0.08	0.15	0.02	1.19	
Summary Statistics																									
Count:	15				15				15				15	15	15				15				15	15	15
Average:	1.41				3.34				5.29				0.18	0.05	1.52				2.40				0.15	0.04	1.26
Median:	1.25				2.34				3.92				0.13	0.01	1.35				1.45				0.11	0.00	1.20
Standard Dev.:	0.69				2.17				4.54				0.10	0.09	0.67				1.88				0.09	0.07	0.39
Minimum:	0.83				1.17				1.32				0.08	0.00	0.80				0.77				0.07	0.00	0.79
Maximum:	3.63				8.73				17.73				0.47	0.33	3.36				7.15				0.39	0.25	2.49
Range:	2.80				7.57				16.41				0.40	0.33	2.56				6.38				0.32	0.25	1.70

^a Off-site laboratory results as reported by TestAmerica after sufficient in-growth time to reach ²²⁶Ra progeny equilibrium.

^b Calculated as discussed in Section 13.3.2.

Table 13-5 Gamma Spectroscopy Biased Sample Analytical Results

Sample ID	Depth (ft bgs)	On-Site Results											Off-Site Results ^a											On-Site/ Off-Site Gross SOF Ratio
		Concentration (pCi/g)									SOF		Concentration (pCi/g)									SOF		
		²³² Th			²²⁶ Ra			²³⁸ U			Gross	Net ^b	²³² Th			²²⁶ Ra			²³⁸ U			Gross	Net ^b	
Result	Uncert. (2σ)	MDC	Result	Uncert. (2σ)	MDC	Result	Uncert. (2σ)	MDC			Result	Uncert. (2σ)	MDC	Result	Uncert. (2σ)	MDC	Result	Uncert. (2σ)	MDC					
GWS Biased Samples																								
3272	16	1.59	0.29	0.11	6.11	1.10	0.61	2.23	0.95	0.66	0.28	0.14	2.18	0.53	0.39	4.91	0.64	0.10	5.57	0.69	0.12	0.27	0.12	1.04
3273	16	1.46	0.21	0.10	9.34	1.76	1.20	19.09	2.09	1.02	0.41	0.26	2.24	0.59	0.45	4.59	0.62	0.12	5.04	0.67	0.13	0.26	0.11	1.58

^a Off-site laboratory results as reported by TestAmerica after sufficient in-growth time to reach ²²⁶Ra progeny equilibrium.

^b Calculated as discussed in Section 13.3.2.

The C-T Phase II DP, Table 4-17, provided mean background activity levels of 1.3, 2.5, and 4.4 picoCuries per gram (pCi/g) for thorium-232 (^{232}Th), radium-226 (^{226}Ra), and uranium-238 (^{238}U), respectively. These values were used to calculate net sum of fractions (SOF) values—note that when measured activity concentration levels were less than the background mean resulting in a negative value, the net activity concentration was set equal to zero for the net SOF calculation.

To mitigate the risk of backfilling, the on-site laboratory analytical results were reviewed to determine the likelihood of the survey unit failing to meet the criteria for radiological release. The on-site laboratory, by design, reported conservative sample results.

13.3.3 Core Boring

The C-T Phase II DP, Table 4-7, provided characterization borehole results. Of the locations provided in the table, four were collected within the extent of SU07: BH-011, BH-012, BH-013, and BH-053. Table 13-6 provides the data for these four locations. Borehole locations with elevated results, BH-011 and BH-012, were collected in the extent of the survey unit identified by AECOM as grids C6 and D6, respectively.

In addition to the characterization borehole results, Section 13.2 discussed that AECOM collected seven auger samples from grids B7, C6, and C7 to a depth of 16 ft bgs, or to the clay layer, whichever came first. Table 13-3 provides the on-site laboratory analytical results. These results demonstrated that remediation was successful and provided confidence that AECOM grid C6 was adequately remediated given the elevated results for BH-011.

The characterization borehole results, along with additional subsurface sampling performed by AECOM, indicate that beyond the excavation extent, additional subsurface contamination was not reasonably expected.

Table 13-6 Characterization Borehole Results

Location ID	Sample Depth (ft)	Activity Concentration (pCi/g) ^a			SOF ^b	
		²³² Th	²²⁶ Ra	²³⁸ U	Gross	Net ^c
BH-011	2 - 3	0.24	2.12	0.65	0.08	0.00
	3 - 4	25.90	115.20	2.30	5.01	4.86
	9 - 10	15.30	40.40	30.40	2.06	1.91
	13 - 14	2.70	2.20	2.80	0.19	0.06
	22 - 23	1.50	1.40	1.20	0.11	0.01
BH-012	5 - 6	33.80	250.20	10.40	9.94	9.79
	9 - 10	8.30	208.70	10.00	7.46	7.31
	11 - 12	5.95	17.60	8.03	0.86	0.71
	12 - 13	1.10	1.51	4.88	0.10	0.00
	13 - 14	1.62	8.07	7.68	0.35	0.21
	14 - 15	2.50	4.80	3.40	0.27	0.13
	15 - 16	0.92	3.30	2.80	0.15	0.03
BH-013	3 - 4	1.28	2.85	7.05	0.16	0.02
	5 - 6	1.60	1.10	4.50	0.11	0.01
	9 - 10	1.10	3.40	4.40	0.17	0.03
	16 - 17	0.95	1.80	1.70	0.10	0.00
BH-053	0.5 - 2	1.40	9.80	7.80	0.40	0.26
	3 - 4	0.76	1.11	2.04	0.07	0.00
	9 - 10	1.40	2.80	5.60	0.16	0.02
	13 - 14	0.88	1.10	2.60	0.08	0.00

^a Italicized results indicate <MDC.

^b **Bolded orange** SOF values indicate a result >0.5 but ≤1 and **bolded red** SOF values indicate a result >1.

^c Calculated as discussed in Section 13.3.2.

13.4 DATA ANALYSIS

The data analysis was performed based on the assumptions, methods, and performance criteria established to satisfy the DQOs in accordance with the C-T Phase II DP, Sections 14.4.1 and 14.4.3. Details regarding FSS design and quality assurance and quality control applicable to all survey units were discussed in Chapters 4 and 5, respectively, of this FSSR.

13.4.1 Elevated Area Evaluation

There were no elevated areas identified in SU07.

13.4.2 Data Set Screening Analysis

Table 13-7 summarizes the results of the screening tests performed in accordance with Pages 14-27 through 14-29 of the C-T Phase II DP. All applicable tests demonstrating compliance passed.

Table 13-7 Screening Tests Results

Screening Test	Test Value	Conclusion
Min/Max	0.37	PASS
Low Level	N/A	Not applicable; Class 1 survey unit
DCGL _w	N/A	Not applicable; Min/Max < 1
EMC Limit	N/A	Not applicable; No elevated areas

13.4.2.1 Min/Max

In accordance with Page 14-27 of the C-T Phase II DP, the Min/Max screening test value was calculated by subtracting the minimum reference area result from the maximum survey unit systematic result. Sample 3259 with a gross SOF of 0.39 (from Table 13-4) was the maximum survey unit systematic result. Sample BH-Z-08 with a calculated gross SOF of 0.02 (from C-T Phase II DP Table B-1) was the minimum reference area result. The Min/Max screening test value was calculated to be 0.37. Because the test value was less than one, no further computations are required, i.e., DCGL_w screening and Wilcoxon Rank Sum (WRS) tests.

13.4.2.2 Low Level

In accordance with Page 14-27 of the C-T Phase II DP, the Low Level screening test is not applicable to Class 1 survey units.

13.4.2.3 DCGL_w

In accordance with Page 14-28 of the C-T Phase II DP and because the Min/Max test value was less than one, the DCGL_w screening test was not applicable to this survey unit.

13.4.2.4 EMC Limit

In accordance with Page 14-28 of the C-T Phase II DP, the elevated measurement comparison (EMC) Limit screening test was not applicable to this survey unit because no elevated areas were identified.

13.4.3 WRS Test

In accordance with Page 14-29 of the C-T Phase II DP and because the Min/Max test value was less than one, the WRS Test was not required to demonstrate compliance.

13.4.4 Retrospective Analysis

A retrospective analysis was performed of the FSS results to determine whether the results met the survey design objectives, in accordance with Page 14-30 of the C-T Phase II DP. Table 13-8 provides the results of the retrospective analysis. Because the actual sample size exceeded the retrospective value sample size, the conclusion is that the survey design objectives were met.

Table 13-8 Retrospective Analysis

Parameter	<i>A Priori</i> Value	Retrospective Value Based on FSS Results (Gross SOF)
Upper Bound of Gray Region	DCGL = 1	1
Lower Bound of Gray Region	0.5 x DCGL = 0.5	0.15
Spatial Variability (standard deviation)	1/6 x DCGL = 0.17	0.092
Type I Error (false positive)	0.05	0.05
Type II Error (false negative)	0.05	0.05
Relative Shift	3	9.2
Calculated N/2 Sample Size	15 ^a	9
Actual N/2 Sample Size	--	15

^aThe *a priori* value of 15 for the N/2 sample size was determined to be a conservative value that would allow application of either the Sign or WRS test. The *a priori* value for N/2 is 10 based on MARSSIM Table 5.3.

13.5 DEVIATIONS

In accordance with the second bullet in Section 14.5 of the C-T Phase II DP, the FSSR is required to list changes made in the FSS from what was proposed in the DP. Only one deviation was noted. Page 14-27 of the C-T Phase II DP indicated that the “data set for the survey unit will be processed within a database using screening software developed and verified for the project.” This database was not developed; instead, a combination of Microsoft[®] Excel[®] spreadsheets and hand calculations was utilized. This deviation is not significant and does not affect the data collection or assessment.

13.6 NRC INSPECTIONS

A summary of NRC inspections applicable to the FSS are provided in Section 5.8 of this FSSR. The scope of the inspections included, but was not limited to: review of project plans, interviewing of project personnel, evaluation of the on-site laboratory, and independent confirmatory surveys conducted by the NRC after backfilling. Inspection Report 040-06563/11-003 noted that the NRC reviewed the FSS data package for SU07 to ensure the licensee conducted the surveys in accordance with the NRC-approved DP and work plans. No violations were identified. No findings of significance were identified.

13.7 CONCLUSION

FSS data were verified to be reliable, appropriately documented, and technically defensible. Specifically, the following conclusions are made:

- The instruments used to collect the data were capable of detecting the radiation type (i.e., gamma) at or below the release criteria (described in Sections 4.4 and 4.5 of this FSSR).
- The calibration of the instruments used to collect the data was current and radioactive sources used for calibration were National Institute of Standards and Technology (NIST) traceable (described in Section 5.4 of this FSSR). Specific records available upon request.

- Instrument response was checked before instrument use each day, at minimum (described in Section 5.4 of this FSSR). Specific records available upon request.
- The survey methods used to collect the data were appropriate for the media and type of radiation being measured (described in Sections 4.4, 4.5, and 4.6 of this FSSR).
- The custody of samples collected for laboratory analysis was tracked from the point of collection until final results were obtained (described in Section 5.5.2 of this FSSR). Specific records available upon request.
- The survey data consist of qualified measurement results that are representative of the area of interest.
- Areas identified with elevated residual radioactivity (i.e. SOF > 1.0) were appropriately investigated and the $DCGL_{EMC}$ properly applied.

All the applicable screening tests passed, the retrospective analysis found that the survey design objectives were met, and additional subsurface contamination was not reasonably suspected. SU07 meets the industrial use scenario release criterion as established in the C-T Phase II DP Chapter 5; and therefore, satisfies the unrestricted release provisions of Title 10, Code of Federal Regulations (CFR), Part 20, Subpart E.

13.8 REFERENCES

Mallinckrodt, *Mallinckrodt Columbium-Tantalum Phase II Decommissioning Plan*, Revision 2, August 2008.