

Lawyer, Dennis

From: Lawyer, Dennis
Sent: Wednesday, February 17, 2016 2:37 PM
To: 'gfenton'
Subject: Fenton Art Glass Co., Request for Additional Information Concerning Application for a License Amendment, Control 589275

Dear Mr. Fenton,

This is in reference to your letter dated February 16, 2016, submitting your Final Status Survey Plan for Termination for Nuclear Regulatory Commission License No. SUB-491, Docket No. 04003149. In order to continue our review, we need the following additional information:

1. Section 2 describes the area needing released. It appears that you have not included Furnace/Tank number 8 which was a major component utilizing uranium.
2. In section 5.0, you state that the DCGL is from Table 5.19 Concentration (dpm/100 cm²) equivalent to 25 mrem/y for the specified value of Pcrit, published in NUREG/CR-5512, Vol. 3. However you quote the value at 1000 dpm/100cm², but the value is 101 dpm/100 cm². However, the correct DCGL is used later. Please confirm you are using a DCGL of 101 dpm/100 cm².
3. Section 7.0 does not discuss the location of the survey points and how you determine where the points are located. Please provide a survey map with the 14 points and state how the locations were determined.
4. Section 7.0 does not discuss scan surveys. Please provide what instrumentation will be used, scan rates, survey procedures, and expected scan minimal detectable concentration or the probability of detection. Please show all formulas, variables, and results of calculations.
5. Section 8.0 appears to use a source efficiency of 0.5 for alpha which is contrary to the recommendations outlined in MARSSIM. For alpha measurements, MARSSIM on page 6-25, states to use a recommended source efficiency of 0.25. With a source efficiency of 0.25, the minimum detectable concentration is 36.5 dpm. This is still sufficient for meeting the DCGL, but the total activity calculations will need to be adjusted due to the lower surface efficiency.
6. Your survey plan did not incorporate loose surface contamination measurements. Please perform a loose surface contamination measurements at the survey locations to show if surfaces have loose contamination.
7. In our discussion on January 6, 2016, you described the tank, furnace, and refractory brick which has natural contaminants. Your survey plan did not discuss surveys of this material nor how you would use brick from other furnaces to show that the brick in the furnace/tank 8 is below the DCGL above the natural contamination level. Please discuss how this material will be released and how you will determine the natural radioactivity associated with brick.
8. The survey zone you describe is of the area where contamination could be suspected. Contamination from the multiple years of operations could have caused movement of the uranium contamination. Please provide an encompassing survey area around the class one zone to show that contamination did not spread.

We will continue our review upon receipt of this information. Please reply to my attention at the Region 1 Office (Address below) and refer to Mail Control No. 589275. If you have technical questions regarding this letter, please call me at (610) 337-5366.

Your reply must be an originally signed and dated letter. The letter may be scanned and submitted as a pdf document attached to an email; or it may be transmitted by facsimile to (610) 337-5269; or it may be sent by regular mail. If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your application OR amendment request.

Region 1 Office Mailing Address: Licensing Assistance Team, US Nuclear Regulatory Commission Region I, 2100 Renaissance Boulevard, Suite 100, King of Prussia, PA 19406-2713.

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