



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

May 5, 2017

[

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SUBJECT: INDIANA RADIUM INSTITUTE-2—RESULTS AND CONCLUSIONS OF THE U.S. NUCLEAR REGULATORY COMMISSION'S INITIAL SITE VISIT

Dear [ ]

I am writing to provide you with the results of the U.S. Nuclear Regulatory Commission (NRC) staff's initial site visit to your property at [ ] performed on December 13, 2016.

The purposes of the initial site visit were to: 1) determine if there are health and safety concerns to current property occupants or site visitors; and 2) identify the locations with the potential for contamination and gather information for a scoping survey plan, should it be needed.

As described in the site summary which was attached to the letter dated October 6, 2016, a building previously located on your property was associated with the former Indiana Radium Institute and was torn down as part of a redevelopment project. Your property is one of five townhomes that is a portion of the historical site. Based on the history of the site and its redevelopment, NRC staff considered the likelihood of discrete sources of radium-226 (Ra-226) being located within the existing structures to be negligible. Therefore, the initial site visit focused on the accessible areas of your property to identify any discrete Ra-226 sources, which may be indicative of additional Ra-226 in subsurface soil.

As discussed within the enclosed report, NRC staff and staff from the Oak Ridge Institute for Science and Education performed radiological surveys consisting of gamma radiation scans and exposure rate measurements. Surveys were conducted on accessible areas outside, and also select areas inside your property. Surveys covered approximately 60 percent of the area within the boundary that includes the five townhomes located at the historical site. With the redevelopment history of the site, it is assumed that the area surveyed in the surface scans is representative of the currently inaccessible subsurface soil covered by the footprint of your property. The NRC did not survey under the current driveway or building foundations.

NRC staff concludes, based on radiological conditions observed during the initial site visit and a review of the site history, that: 1) there is no indication of discrete sources of Ra-226 on the

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[ ]

portions of your property that were evaluated; and 2) a follow-up scoping survey is not required as it would be unlikely to yield additional information.

Given these conclusions, no further actions are needed from you at this time. You should be aware that the NRC will be performing an initial site visit at another property associated with the former Indiana Radium Institute. This property is located near yours and consists of the abutment between your property and [ ]. This initial site visit may yield additional information relevant to your property. Should that occur, you will be contacted.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," upon removal of the bracketed information, a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions concerning this letter, please contact Mr. Theodore Smith, Acting Chief, Materials Decommissioning Branch, Division of Decommissioning, Uranium Recovery and Waste Programs, Office of Nuclear Materials Safety and Safeguards, at (301) 415-6721, or Mr. Matthew Meyer, Project Manager, at (301) 415-6198.

Sincerely,

*/RA/*

John R. Tappert, Director  
Division of Decommissioning, Uranium Recovery  
and Waste Programs  
Office of Nuclear Material Safety  
and Safeguards

Docket No. 03038959

Enclosure:

Site Status Report for Indiana Radium Institute-2 [ ]

REGISTERED LETTER – RETURN RECEIPT REQUESTED

[ ]

SUBJECT: INDIANA RADIUM INSTITUTE-2—RESULTS AND CONCLUSIONS OF THE U.S. NUCLEAR REGULATORY COMMISSION'S INITIAL SITE VISIT

**DISTRIBUTION:**

RidsRgn3MailCenter

M. Kunowski, RIII

B. Lin, RIII

M. Meyer, NMSS

**ADAMS Accession No.: ML17061A704**

**\*via e-mail**

<b>OFFICE</b>	DUWP/MDB/PM	DUWP/LA	DUWP/MDB	DUWP/MDB
<b>NAME</b>	JWhited	CHolston	ASchwartzman*	RNelson*
<b>DATE</b>	02/28/2017	02/28/2017	03/16/2017	03/02/2017
<b>OFFICE</b>	RIII/DNMS/BC	DUWP/MDB/BC (A)	OGC (NLO)	DUWP
<b>NAME</b>	MKunowski*	TSmith	AWase*	JTappert
<b>DATE</b>	03/22/2017	03/24/2017	04/06/2017	05/05/2017

**OFFICIAL RECORD COPY**

Enclosure

OAK RIDGE INSTITUTE FOR SCIENCE AND EDUCATION:  
SITE STATUS REPORT FOR THE INDIANA RADIUM INSTITUTE AT  
[ ]

May 5, 2017

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EXECUTIVE SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) requested that the Oak Ridge Institute for Science and Education (ORISE) perform a radiation survey of the property at [

] This property covers part of the footprint once occupied by the Indiana Radium Institute, which used radium sources to treat cancers and other skin diseases into the early 1920s. The original building was torn down, and the land has been redeveloped. The objective of this survey was to locate possible discrete sources of radium, if any, that would be associated with the Indiana Radium Institute's operations.

ORISE performed the radiation survey on December 13, 2016, and did not identify elevated levels of radiation indicative of discrete sources of radium. Because no elevated levels of radiation were identified, ORISE concludes that discrete sources of radium are likely not present in subsurface soils. Based on these results, it is recommended that the NRC not pursue additional action at the [ ] property.

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**OFFICIAL USE ONLY – PERSONALLY IDENTIFIABLE INFORMATION**  
**SITE STATUS REPORT**

Property: Former Indiana Radium Institute  
[ ]

Docket Number: 03038959

Current Property Name: Private residential

Current Property Owner: Private residential

Inspection Dates: December 13, 2016

Participants: Mike Kunowski/ NRC, Harral Logaras/ NRC, Maureen Conley/ NRC, Amber Kent/ Indiana State Department of Homeland Security, supported by Teresa Brown/Oak Ridge Associated Universities (ORAU)

## 1.0 INTRODUCTION

The Energy Policy Act of 2005 amended section 11e.(3) of the Atomic Energy Act of 1954 to place discrete sources of radium-226 (Ra-226) under U.S. Nuclear Regulatory Commission (NRC) regulatory authority as byproduct material. The NRC is evaluating properties where review of historical information has identified Ra-226 use. The property at [ ] was identified as a portion of the Indiana Radium Institute, a medical facility that operated from 1917 to 1922 (Oak Ridge National Laboratory (ORNL) 2015). The objectives of the initial site visit were to determine if discrete sources of Ra-226 and/or distributed Ra-226 contamination are present, to identify the areas of highest contamination, to determine if there are any current health and safety concerns, and to determine if a scoping survey is needed. Surveys were performed as described within NRC's procedure, Temporary Instruction (TI) 2800/043, "Inspection of Facilities Potentially Contaminated with Discrete Radium-226 Sources" (NRC 2016).

Data collected during the December 13, 2016, site visit, which includes gamma radiation scans and exposure rate measurements, are used to plan future actions that may be needed to reduce Ra-226 exposure to current or future site occupants to levels that do not exceed the applicable regulatory requirement. It is important to note that destructive testing is not generally performed as described within TI 2800/043.

## 2.0 PROPERTY DESCRIPTION AND INITIAL SITE VISIT CONSIDERATIONS

### 2.1 Property Description and History

The site summary included in the "Historical Non-Military Radium Sites Research Effort Addendum" report (ORNL 2015) provides known site details about the type, form, history, potential locations and other information related to discrete sources of Ra-226 used at the site. The Indiana Radium Institute, a medical facility that performed radium therapy, was once located at [ ] in Indianapolis, Indiana (see Figure 1). The northern portion of this area is now located near the [ ] while the southern portion has been re-developed into a single building containing five townhomes on [ ]. The scope of this report is limited to a single townhome in the east section of that building.

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Directly on either side of [ ] are grassy areas sloping up to the interstate with residential and shopping areas further down the road.

The exact amount of radium that was used at the Indiana Radium Institute is unknown. According to advertisements, the Indiana Radium Institute performed “accurate and scientific application of radium,” provided “radium for renting purposes,” and used radium in “solution for emanation” (ORNL 2015).

[

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Figure 1. Approximate Location of the Indiana Radium Institute in Indianapolis  
(Google Earth, 2014)

2.2 Initial Site Visit Considerations

Based on the history of the property and its redevelopment, NRC staff considers the likelihood of discrete sources of Ra-226 existing in current property structures to be negligible. Rather, were discrete sources of Ra-226 present, they would likely be in subsurface soils. However, it is likely that existing surface soils were transported off site and backfill materials were brought in during redevelopment activities. As a result, potential mixing between the backfill and remaining subsurface soils would likely further dilute any remaining discrete subsurface sources of Ra-226. The structures, pavement, and other obstructions on the property limited the area in which soil surveys could be performed. Therefore, this initial site visit focused on identifying discrete sources of Ra-226 associated with the areas surrounding the townhomes. Surveys covered approximately 60 percent of the area within the property boundary that includes the five townhomes located at the historical site.

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3.0 SITE OBSERVATIONS AND FINDINGS

3.1 Summary of Activities

The inspection team conducted an initial site visit with radiological surveys at the [ ] property on December 13, 2016. A pre-inspection meeting was held with Mike Kunowski, Herral Logaras, and Maureen Conley from NRC, Amber Kent from the State of Indiana, and Teresa Brown from ORAU. Participants discussed the inspection team’s intention to perform general area surveys inside and outside the [ ] property. The inspection team obtained consent from the current owners prior to commencing survey activities.

Radiological surveys consisted of gamma radiation scans using a Ludlum model 44-10 2-inch by 2-inch sodium iodide detector (2×2) connected to a Ludlum model 2221 ratemeter/scaler, and exposure rate measurements using a Ludlum model 192 ratemeter. The 2×2 sodium iodide detector can respond to gamma-emitting radionuclides located in the top 6 to 12 inches of soil. A Ludlum model 44-142 plastic scintillator was available for direct surface activity measurements. Surface scans inside the townhome focused on areas that were near the original facility footprint, which included the interior garage, back entrance, first floor bathroom, and kitchen. Likewise, surface scans outside the townhome focused on the garden, deck, and driveway areas. Table 1 presents the specific instruments used during the initial site visit.

<b>Radiation Type (units)</b>	<b>Detector Type</b>	<b>Detector (Number)</b>	<b>Ratemeter (Number)</b>
Alpha-plus-beta (cpm)	Plastic Scintillator	44-142 (690)	2221 (602)
Gross gamma (cpm)	Sodium Iodide	44-10 (1151)	2221 (693)
Gross gamma (µR/h)	Exposure Rate Meter	192 (1128)	N/A

N/A = not applicable; ratemeter is not required  
Number = equipment tracking number  
cpm = counts per minute  
µR/h = microRoentgen per hour

3.2 Summary of Results

Figure 2 presents a summary of results from the initial site visit. Inspectors identified no anomalous gamma radiation measurements and did not identify any discrete Ra-226 materials in the surveyed areas at the [ ] property. In general, the sodium iodide detector background responses ranged from about 6,000 to 9,000 counts per minute (cpm) inside the townhome, depending on proximity to concrete, brick walls, and various kinds of tile flooring, and 5,000 to 5,700 cpm outside the townhome, depending on proximity to brick buildings, sidewalks, and grassy areas. Exposure rates also varied depending on proximity to naturally occurring radioactive materials (NORM), with a consistent range from 3.5 to 5 microRoentgens per hour (µR/h<sup>1</sup>) inside and 4 µR/h outside the townhome. These results are expected with NORM in this configuration.

<sup>1</sup> NOTE: Roentgen (R) is a unit of exposure (energy absorbed in air), whereas a Rem is a unit of dose delivered to a person (resulting from the radiation energy absorbed in that person). While Roentgen and Rem are related, these are different units. Because they are similar for gamma ray energies from Ra-226, NRC makes the simplifying assumption in this case that these units are equivalent (1 Roentgen = 1 Rem).



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In addition, no records were identified that suggest discrete sources of radium exist after the property’s redevelopment. The upper floors within the townhome were not surveyed as the primary concern was potential exposure from underlying subsurface soils.

<b>SITE:</b> Indiana Radium Institute	<b>AREA:</b> [ ]	<b>DATE:</b> 12/13/2016	<b>TIME:</b> 14:00 - 18:30
<b>SURVEYOR(S):</b> T. Brown		<b>PURPOSE:</b> Site Visit	

<b>TYPE</b>	<b>INSTRUMENT</b>	<b>DETECTOR</b>	<b>BACKGROUND</b>
Gamma	2221 #693	44-10 #1151	5.2 – 8.8 kcpm <sup>a</sup>
Exp. Rate	192 #1128	NA	3.5 – 5 µR/h <sup>a</sup>

<sup>a</sup>Background varied depending on NORM in the area.

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Figure 2. Survey Results of [ ] Property

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3.3 Summary of Dose Assessment Results

Because no radiation levels were detected above background and no discrete sources of radium were encountered, a dose attributed to discrete radium sources could not be calculated.

4.0 OBSERVATIONS AND RECOMMENDATIONS

There was no indication from the areas surveyed that the [ ] property, occupying a portion of the former Indiana Radium Institute, contains discrete sources of Ra-226 as determined by the following observations:

- Gamma radiation levels were consistent with background.
- The absence of observable gamma radiation anomalies is indicative that there are no discrete sources of Ra-226 present.
- There was no historical evidence that discrete sources of Ra-226 are present following the Institute's demolition and the property's subsequent redevelopment.
- Risk of potential contamination on the site is low and, if present, would most likely be found at a significant depth in the subsurface soil.

Therefore, the recommendation to the NRC staff is that a more detailed scoping survey is not necessary at this time, and NRC staff should not pursue additional action at the [ ] property.

5.0 REFERENCES

NRC 2016. *Inspection of Facilities Potentially Contaminated with Discrete Radium-226 Sources*, Temporary Instruction 2800/043, U.S. Nuclear Regulatory Commission, Office of Nuclear Material Safety and Safeguards, Washington, D.C., October. (Agencywide Documents Access and Management System [ADAMS] Accession No. ML16035A053).

ORNL 2015. *Historical Non-Military Radium Sites Research Effort Addendum*, "Indiana Radium Institute: Site Summary," Pages 68-72, Oak Ridge National Laboratory, Oak Ridge, Tennessee, November 24 (ADAMS Accession No. ML16291A488).