

## Hickman, John

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**From:** Hickman, John  
**Sent:** Wednesday, January 11, 2017 3:49 PM  
**To:** Tom Rielly  
**Subject:** RE: Zion Characterization of Land Fill materials

Tom,

Zion was clear from the beginning that some material from the site would be shipped to local landfills. By NRC regulations only material with no detectable plant related contamination may be disposed of in non-licensed landfills. We expected that some of the buildings and equipment on the site would be considered non-impacted and could be surveyed and disposed of in local landfills. Inspectors from the Region III office are monitoring this activity and the radiological characterization of the materials to be disposed.

The "rip and ship" concept referred to the disposal of contaminated material. Traditionally it has been common to remove surface contamination to allow the bulk of the material to be disposed of in landfills not licensed for radioactive materials. This frequently entailed scabbling the surface layers of concrete structures, chemical or abrasive decontamination of metal and equipment, and other labor intensive efforts. The "rip and ship" concept was to avoid this labor intensive part of the job and to send all contaminated material to Clive. However, as I stated above, this did not mean that non-impacted material with no detectable contamination would be sent to Clive when that would be an unnecessary expense.

Hope your holidays were enjoyable.

John

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**From:** Tom Rielly [mailto:tr649@sbcglobal.net]  
**Sent:** Friday, December 09, 2016 5:43 PM  
**To:** Hickman, John <John.HickmanNMSS@nrc.gov>  
**Subject:** [External\_Sender] Zion Characterization of Land Fill materials

Hi John,  
Zion Solutions LLC as you know is and has been shipping remnants of the Zion Station facilities in tear down mode to local landfills via 10 yard motor transport.

We see this as being in possible conflict with what we recall were the licensee's original plan and dictates that is to rip and ship all materials to their Clive facility.

We may be incorrect in our recollection but wanted to come to the NRC on this matter as it appears almost all daily activity in this regard has been ceded to Brandenburg construction. We know Zion Solutions has management on site and procedures in place but how are local interests assured that irradiated materials remain guaranteed outside the local waste stream to local landfills.

Is the NRC RIII monitoring this?

What was the original plan and intent as presented to the NRC?

Thank you and Happy Holidays.

Tom Rielly  
Executive Principal  
Vista 360