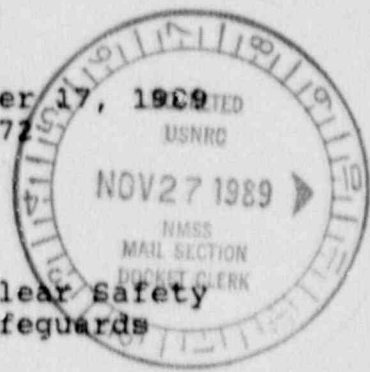


November 17, 1989
696-1477



Mr. Leland C. Rouse, Chief
Fuel Cycle Safety Branch
Division of Industrial and Medical Nuclear Safety
Office of Nuclear Material Safety & Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Docket 70-734: SNM-696; Request to Delete
Certain Portions of Facilities From General
Atomsics' License

- References:
- a) Asmussen, Keith E., letter 696-8023 to William T. Crow, "Plan for Obtaining Release of Certain Areas to Unrestricted Use," dated October 1, 1985
 - b) Asmussen, Keith E., letter 696-9096 to William T. Crow, "Plan for Obtaining Release of Approximately 215 Acres to Unrestricted Use," dated December 15, 1986
 - c) Asmussen, Keith E., letter 696-1146 to Robert D. Thomas, "Request for Release to Unrestricted Use," dated November 18, 1987
 - d) Rouse, Leland C., letter to Keith Asmussen dated October 19, 1989

Log Dec 89-1
Remit No.
Check No. 2562214
Amount \$150
Pay to order CA 10
Type of Disbursement
Date Check Issued 12/1/89
Date Completed 12/7/89
By Jackson

Dear Mr. Rouse:

As you are aware, General Atomics (GA) has been decontaminating portions of its land and facilities to meet NRC-approved criteria for release to unrestricted use. These efforts are being conducted in accordance with two NRC-approved plans (Refs. a and b) and SNM-696 license condition 25. To date, approximately 295 acres of land have been released, as reflected in amendments 9 and 12 to GA's license.

In addition, GA has been in the process of identifying portions of its facilities for which it has no plans to conduct future activities involving the use of radioactive materials. These areas are being decontaminated to meet NRC-approved criteria for release to unrestricted use and,

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upon receiving confirmation from NRC that the areas meet the criteria for release to unrestricted use, some of these areas, or portions thereof, are being leased to outside companies. Prior to embarking on this effort in 1987, GA sought and obtained NRC guidance and concurrence regarding proceeding in this manner. GA was informed that the NRC preferred not to delete portions of a licensee's building from its license in piecemeal fashion.

Proceeding with the approach described above, GA made its first request in November 1987 (Ref. c). At that time, GA requested the release of selected laboratories and their associated offices to unrestricted use, but, consistent with the above described approach, did not request a license amendment. However, in accordance with your letter of October 19, 1989 (Ref. d), GA will in the future include an appropriate request for a license amendment with each request for a confirmatory survey.

As was agreed to during conversations between Mr. McCaughey and Ms. Horn of your staff and myself, GA hereby requests NRC to delete from GA's license all portions of Buildings 2 and 9 which GA has previously requested to be released to unrestricted use. In Building 2, this consists of selected laboratories and associated offices; in Building 9, the areas consist of selected rooms, hallways and portions thereof. The specific laboratories, rooms and areas are listed in the attachment to this letter.

In Building 2, GA has referred to a collection of laboratories (and associated offices) which were surveyed during a particular confirmatory survey as a "group" of laboratories. In Building 9, GA has referred to the collection of areas surveyed during a particular confirmatory survey effort as a "stage." This notation has been used in GA's correspondence requesting confirmatory surveys and is used in the attachment to this letter.

The attachment to this letter also references documents related to each GA request for a confirmatory survey/release to unrestricted use. This list includes references for associated documentation such as: GA's transmittal letters for reports documenting GA's final survey results, NRC inspection reports/letters, Oak Ridge Associated Universities final reports, etc.

The following discussion addresses how it is assured that the use of NRC-licensed material has not been and will not be allowed in areas for which confirmatory surveys have been conducted.

GA's tenants are, of course, not allowed to conduct any activities involving the use of radioactive material under GA's license. Further, no tenant has applied on their behalf for an NRC license. There have been, though, instances consistent with the scenario GA presented to NRC in Ref. c, where GA tenants have applied to the State of California for by-product material licenses.

GA controls activities involving the use of radioactive material by its employees through the Work Authorization process as described in Section 3 of the specifications volume of GA's SNM license. Work Authorization requests are reviewed by, and must be approved by (among others), the Manager of Health Physics and the Manager of Licensing, Safety and Nuclear Compliance. These managers, as well as others, have been actively involved in the formulation of GA's policy to not use licensed material in areas that have been subjected to confirmatory surveys. Thus, they have not, nor would they, approve a request for a Work Authorization to use licensed material in surveyed areas. Incidentally, there have been no Work Authorization requests to conduct activities involving licensed material in any of the surveyed areas.

Enclosed is a check in the amount of \$150 for the application fee covering this license amendment request.

We trust you will find this letter responsive to your letter of October 19, 1989. If you should have any questions or need any additional information, please contact me at (619) 455-2823.

Very truly yours,

Keith E. Asmussen

Keith E. Asmussen, Manager
Licensing, Safety and
Nuclear Compliance

Attachment (as stated)
cc: John B. Martin, Regional Administrator,
U.S. NRC, Region V
Merri Horn, NRC Headquarters

**General Atomics' Areas
Meeting NRC and State of California Criteria
for Release to Unrestricted Use
as Confirmed by
Oak Ridge Associated Universities'
Environmental Survey and Site Assessment Team**

I. Building 2 - Science Laboratories Building

Group 1 (total area: about 10,115 ft²)

Related confirmatory documentation:

GA Survey Report: Ref. 1 and Ref. 2 (Ref. 2
supersedes Ref. 1)

NRC Inspection/Survey Report: Ref. 3

Labs/Rooms: 102, 104, 107, 109, 111, 113,
115, 117, 119, 122, 128, 130, 132, 134, 137,
139, 141, 143, 145, 147, 149, 151, 154, 641
and 643

Mezzanines associated with labs: 115, 117,
119, 122, 641 and 643

Mezzanines only: none

Group 2 (total area: about 5,652 ft²)

Related confirmatory documentation:

GA Survey Report: Ref. 4
ORNL Survey Report: Ref. 5
NRC letter: Ref. 6

Labs/Rooms: 228, 230, 232, 236, 311, 313,
319, 331, 333, 419, 421, 435 and 437

Mezzanines associated with labs: 331, 333,
419 (extends over 417), 435 and 437

Mezzanines only: 417

Group 3 (total area: about 9,612 ft²)

Related confirmatory documentation:

GA Survey Report: Refs. 7 and 8
ORNL Survey Report: Ref. 9
NRC letter: Ref. 10

Labs/Rooms: 234, 302, 309 room 1, 309 room 2, 315, 321, 323, 327, 343, 345, 347, 425, 427, 429, 431, 433, 647, 649 and 651

Mezzanines associated with labs: 321, 323, 327, 343, 345, 347, 425, 427, 429, 431, 433 and 647

Mezzanines only: 325, 335, 337, 339, 341, 349, 615, 617 and 645

Group 4 (total area: about 3,749 ft²)

Related confirmatory documentation:

GA Survey Report: Ref. 11

ORNL Survey Report: expected in December 1989

Labs/Rooms: 317, 355, 357, 359, 361, 554, 556, 558, 560, 562 and 564

Mezzanines associated with labs: 317, 359 and 361

Mezzanines only: none

II. Building 9 - Experimental Building

Building 9 exclusive of "Hot Suite" Area

Related confirmatory documentation:

GA Survey Report: Ref. 12

NRC Inspection/Survey Report: Ref. 13

Areas: See attached Figure 1.

Stage 1 of "Hot Suite" Area (total area: about 2,880 ft²)

Related confirmatory documentation:

GA Survey Report: Ref. 14

ORNL Survey Report: Ref. 9

NRC Concurrence: Ref. 10

Rooms/Areas: 39, 48, 49A, 50, 46B¹, 47A,
hallways east and south of room 47A, 38, 34²,
33³, and hallway east of room 38--see
attached Figures 1 and 2

Stage 2 of "Hot Suite" Area (total area: about 587 ft²)

Related confirmatory documentation:

GA Survey Report: Ref. 15

ORNL Survey Report: expected in December 1989

Rooms/Areas: 40, 41, 42, 43 and 47--see
attached Figures 1 and 2

¹Room denoted here and in ORAU's report as 46B was included in what was referred to as hallway in GA's reports.

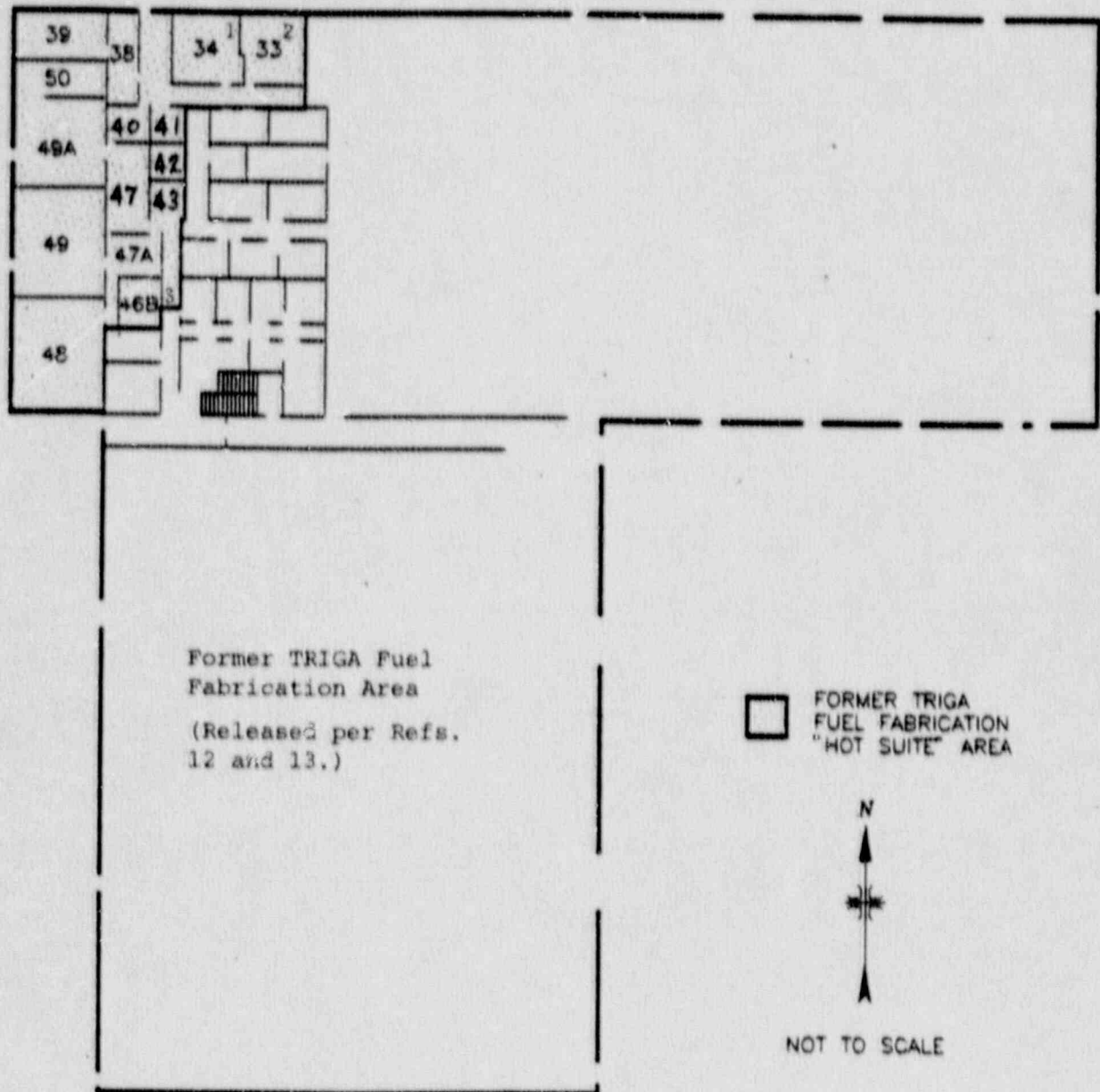
²Room denoted here and in ORAU's report as 34 was denoted as 35 in GA's reports.

³Room denoted here and in ORAU's report as 33 was denoted as 34 in GA's reports.

References

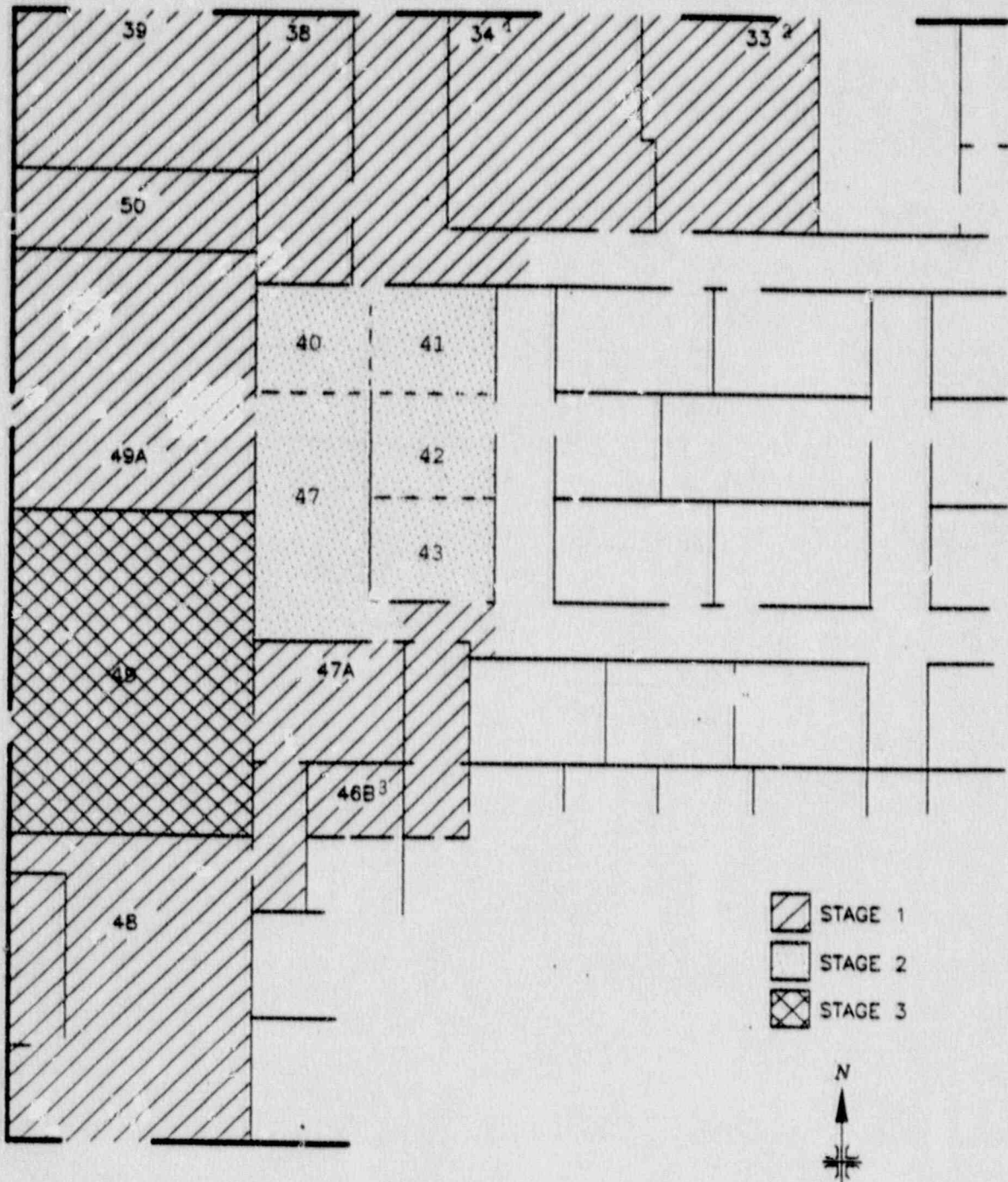
1. Asmussen, K. E., letter no. 696-1146 to Robert D. Thomas, "Request for Release to Unrestricted Use," dated November 18, 1987. [Group 1]
2. Asmussen, K. E., letter no. 696-1163 to Robert D. Thomas, "Request for Release to Unrestricted Use - Revised Final Report," dated January 19, 1988.
3. Montgomery, James L., letter to R. N. Rademacher, "Inspection at GA Technologies Inc. (Confirmatory Survey)," dated February 26, 1988. Letter transmitted Inspection Report No. 70-734/87-15.
4. Asmussen, K. E., letter no. 696-1231 to Robert D. Thomas, "Request for Release of Selected Laboratories to Unrestricted Use," dated May 10, 1988.
5. Cotten, P. R., "Confirmatory Survey of Phase IV Decommissioning / General Atomics / San Diego, California," ORAU Final Report ORAU 88/J-89, dated November 1988.
6. McCaughey, David A., letter to Keith E. Asmussen, dated December 15, 1988.
7. Asmussen, K. E., letter no. 696-1318 to Mr. Robert D. Thomas, "Request for Release of Selected Laboratories to Unrestricted Use (Group 3)," dated December 21, 1988.
8. Asmussen, K. E., letter no. 696-1464 to R. F. Fish, "Addendum to 'Group 3' Report Dated December 21, 1988," [Note: "Group 3" Report was dated December 21, 1988; the addendum was dated September 2, 1989.] dated October 17, 1989.
9. Cotten, P. R., "Confirmatory Survey of Facilities in Buildings 2 and 9 / General Atomics / San Diego, California," ORAU Final Report ORAU 89/F-98, July 1989.
10. Yuhas, Gregory P., letter to R. N. Rademacher, "NRC Inspection," (with ORAU Final Report ORAU 89/F-98 dated July 1, 1989), dated August 18, 1989.
11. Asmussen, K. E., letter no. 696-1447 to Mr. R. F. Fish, "Request for Confirmatory Survey (Selected Laboratories in Building 2 - Group 4)," dated September 13, 1989.

12. Asmussen, K.E., letter no. CAL-1095 to Ben Kapel (State of California [with copy to James Montgomery, NRC Region V], "*Final Survey Report of the Decontamination of GA Technologies' Experimental Building*," dated July 28, 1987.
13. Montgomery, James L., letter to R. N. Rademacher, "*Inspection at GA-Technologies, Inc. (Confirmatory Survey)*," dated October 1, 1987.
14. Asmussen, Keith E., letter no. 696-1337 to Robert D. Thomas, "*Request for Confirmatory Survey (Experimental Building - Stage 1)*," dated January 30, 1989.
15. Asmussen, K. E., letter no. 696-1443 to Mr. R. F. Fish, "*Request for Confirmatory Survey (Experimental Building - Stage 2)*," dated August 31, 1989.



- (1) Room denoted here and in ORAU's report as 34 was denoted as 35 in GA's reports.
- (2) Room denoted here and in ORAU's report as 33 was denoted as 34 in GA's reports.
- (3) Room denoted here and in ORAU's report as 46B was included in what was referred to as hallway in GA's reports.

Figure 1. General Atomics' Experimental Building (Bldg. 9) Showing Former TRIGA Fuel Fabrication Area and Former TRIGA Fuel Fabrication "Hot Suite" Area



- (1) Room denoted here and in ORAU's report as 34 was denoted as 35 in GA's reports.
- (2) Room denoted here and in ORAU's report as 33 was denoted as 34 in GA's reports.
- (3) Room denoted here and in ORAU's report as 46B was NOT TO SCALE included in what was referred to as hallway in GA's reports.

Figure 2. Decontamination "Stages" for the "Hot Suite" Area of General Atomics' Experimental Building (Bldg. 9)