

UNITED STATES NUCLEAR REGULATORY COMMISSION REGION III 799 ROOSEVELT ROAD GLEN ELLYN, ILLINOIS 60137

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CCR 3 1091
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Docket No. 40-2061

Kerr McGee ATTN: Ivan L. Denny Manager, Special Projects Kerr McGee Center Oklahoma City, OK 73125



Gentlemen:

This refers to the items discussed during a meeting held on January 20, 1981, between Kerr McGee and NRC representatives concerning the decontamination of the building at 185 W. Washington Avenue, West Chicago. At that meeting, you agreed to submit a revised plan after reviewing our comments on your current proposed plan.

Our review indicates the plan should be revised to include the following:

- 1. Identify the qualifications of the supervisory health physicist and the decontamination technicians who will be working on this project.
- Incorporate, by reference, health physics procedures previously submitted for the factory site into the current Westrum Building decontamination plan.
- Verify that external exposure and personal air monitoring records will be maintained as required by 10 CFR 20.401.
- 4. Verify that the decontamination criteria for release will be those found in the enclosed "Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use or Termination of Licenses for Byproduct, Source, or Special Nuclear Material" issued December, 1973. These were the criteria in effect when the building was released in 1975.

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In your reply to this letter, please indicate whether the revised plan, in whole or part, can be released to the current owner of the building. If you have further questions or comments, please contact C. J. Paperiello at 512/932-2611.

Sincerely,

W. L. Disher

W. L. Fisher, Acting Chief Fuel Facility and Materials Safety Branch

Enclosure: As stated

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cc w/encl: John Bergoff Scott Munson Central Files Reproduction Unit NRC 20b PiR Local PDR NSIC

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GUIDELINES FOR DECONTAMINATION OF FACILITIES AND EQUIPMENT PRIOR TO RELEAL. FOR UNRESTRICTED USE OR TERMINATION OF LICENSES FOR BYPRODUCT, SOURCE, OR SPECIAL NUCLEAR MATERIAL

> U.S. Nuclear Regulatory Commission Division of Fuel Cycle and Material Safety Washington, D. C. 20555

The instructions in this guide in conjunction with Table I specify the radioactivity and radiation exposure rate limits which should be used in accomplishing the decontamination and survey of surfaces or premises and equipment prior to abandonment or release for unrestricted use. The limits in Table I do not apply to premises, equipment, or scrap containing induced radioactivity for which the radiological considerations pertinent to their use may be different. The release of such facilities or items from regulatory control will be considered on a case-by-case basis.

- The licensee shall make a reasonable effort to eliminate residual contamination.
- 2. Radioa: 'ivity on equipment or surfaces shall not be covered by paint, plating, or other covering matrial unless contamination levels, as determined by a survey and documented, are below the limits specified in Tables I prior to applying the covering. A reasonable effort must be made to minimize the contamination prior to use of any covering.
- 3. The radioactivity on the interior surfaces of pipes, drain lines, or ductwork shall be determined by making measurements at all traps, and other appropriate access points, provided that contamination at these locations is likely to be representative of contamination on the interior of the pipes, drain lines, or ductwork. Surfaces of premises, equipment, or scrap which are likely to be contaminated but are of such size, construction, or location as to make the surface inaccessible for purposes of measurement shall be presumed to be contaminated in excess of the limits.
- 4. Upon request, the Commission may authorize a licensee to relinquish possession or control of premises, equipment, or scrap having surfaces contaminated with materials in excess of the limits specified. This may include, but would not be limited to, special circumstances such as razing of buildings, transfer of premises to another organization continuing work with radioactive materials, or conversion of facilities to a long-term storage or standby status. Such requests must:
  - a. Provide detailed, specific informat describing the premises, equipment or scrap, radioactive contaminants, and the nature, extent, and degree of residual surface contamination.
  - b. Provide a detailed health and safety analysis which reflects that the residual amounts of materials on surface areas, together with other considerations such as prospective use of the premises, equipment or scrap, are unlikely to result in an unreasonable risk to the health and safety of the public.
- 5. Prior to release of premises for unrestricted use the licensee shall make a comprehensive radiation survey which establishes that contamination is within the limits specified in Table I. A copy of the survey report shall be filed with the Chief, Materials Branch, Division

of Fuel Cycle and Material Safety, USNRC, Washington, D.C. 20555, and also the Director of the Regional Office of the Office of Inspection and Enforcement, USNRC, having jurisdiction. The report should be filed at least 30 days prior to the planned date of abandonment. The survey report shall:

a. Identify the premises.

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- b. Show that reasonable effort has been made to eliminate residual contamination.
- c. Describe the scope of the survey and general procedures followed.
- d. State the findings of the survey in units specified in the instruction.

Following review of the report, the NRC will consider visiting the facilities to confirm the survey.

## TABLE I

	ACCEPTABLE	SURFACE	CONTAMINATION LEVELS	
1	ACCELLINDEE	JURFALL	CUNTAMINATION LEVELS	

NUCLIDES <sup>a</sup>	AVERAGE <sup>b</sup> c f 5,000 dpm $\alpha/100$ cm <sup>2</sup>	MAXIMUM <sup>b</sup> d f 15,000 dpm α/100 cm <sup>2</sup>	FEMOVABLE <sup>b e f</sup> 1,000 dpm $\alpha/100$ cm <sup>2</sup>
U-nat, U-235, U-238, and associated decay products			
Transuranics, Ra-226, Ra-228, Th-230, Th-228, Pa-231, Ac-227, I-125, I-129	100 dpm/100 cm <sup>2</sup>	300 dpm/100 cm <sup>2</sup>	20 dpm/100 cm <sup>2</sup>
Th-nat, Th-232, Sr-90, Ra-223, Ra-224, U-232, I-126, I-131, I-133	1000 dpm/100 cm <sup>2</sup>	3000 dpm/100 cm <sup>2</sup>	:00 dpm/100 cm <sup>2</sup>
Beta-gamma emitters (nuclides with decay modes other than alpha emission or spontaneous fission) except Sr-90 and others noted above.	<b>5000 dpm</b> βγ/100 cm <sup>2</sup>	15,000 dpm βγ/100 cm <sup>2</sup>	1000 dpm By/100 cm <sup>2</sup>

Where surface contamination by both alpha- and beta-gamma-emitting nuclides exists, the limits established for alpha- and beta-gamma-emitting nuclides should apply independently.

As used in this table, dpm (disintegrations per minute) means the rate of emission by radioactive material as determined by correcting the counts per minute observed by an appropriate detector for background, efficiency, and geometric factors associated with the instrumentation.

Measurements of average contaminant should not be averaged over more than 1 square meter. For objects of less surface area, the average should be derived for each such object.

<sup>d</sup>The maximum contamination level applies to an area of not more than 100 cm<sup>2</sup>.

<sup>e</sup>The amount of removable radioactive material per 100 cm<sup>2</sup> of surface area should be determined by wiping that area with dry filter or soft absorbent paper, applying moderate pressure, and assessing the amount of radioactive material on the wipe with an appropriate instrument of known efficiency. When removable contamination on objects of 'ass surface area is determined, the pertinent levels should be reduced proportionally and the entire surface should be wiped.

<sup>f</sup>The average and maximum radiation levels associated with surfce contamination resulting from beta-gamma enitters should not exceed 0.2 mrad/hr at 1 cm and 1.0 mrad/hr at 1 cm, respectively, measured through not more than 7 milligrams per square sentimeter of total absorber.