

Docket No. 040-00133

Mr. Louis H. Weinstein, Esq.  
Squire, Sanders & Dempsey  
4900 Society Center  
127 Public Square  
Cleveland, OH 44114

DEC 27 1993

Dear Mr. Weinstein:

We are transmitting herewith our comments on the draft Work Plan for the characterization of the former Clevite Corporation Site, which you forwarded to the Nuclear Regulatory Commission on November 9, 1993. The report of an inspection of that site, which was conducted by NRC Region III, on December 6 and 8, 1993, is being transmitted under a separate cover. The NRC surveys should be considered as scoping surveys only and additional measurements for residual contamination, as described in the characterization portion of your Work Plan, will be needed.

Based upon these documents, you are requested to prepare and submit for approval within 60 days, a revised Characterization Work Plan. In our comments, we are suggesting that your efforts should follow the guidance of NUREG/CR-5849, "Manual for Conducting Radiological Surveys in Support of License Termination," for appropriate protocols for sampling and surveying.

Once the NRC staff has reviewed and transmitted to you approval of a revised Characterization Work Plan, you may then initiate the necessary characterization studies. Following NRC review and approval of the results and findings of the Characterization Survey, submittal of a remediation work plan will then be appropriate.

Sincerely,  
[Original signed by]  
John H. Austin, Chief  
Decommissioning and Regulatory  
Issues Branch  
Division of Low-Level Waste Management  
and Decommissioning  
Office of Nuclear Material Safety  
and Safeguards

300016

Enclosure: As stated

cc: See Attached List w/enclosure

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Docket No. 040-00133 (Terminated)  
License No. SNM-183, C-3692,  
C-3790, 34-000653-01/02 (Terminated)

Letter dated \_\_\_\_\_

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U.S. Nuclear Regulatory Commission  
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George M. McCann  
Gary Shear  
William Axelson

### Comments on Clevite Characterization Work Plan

The comments below reflect the discussions held November 16, 1993, between representatives of Gould, Inc. and the U.S. Nuclear Regulatory Commission in the offices of Squire, Sanders and Dempsey in Cleveland, OH, and are intended to assist Clevite in the expeditious remediation of the property at 540 East 105th Street in Cleveland. The Site Decommissioning Management Plan (SDMP) review process for securing an NRC release of the site consists of the following general steps:

1. Submittal of a site characterization plan for NRC approval;
2. Performance of site characterization survey;
3. Submittal of the site characterization survey report for NRC approval;
4. Submittal of a remediation plan for NRC approval;
5. Site remediation;
6. Submittal of a final survey report;
7. Performance of a confirmatory survey by NRC; and
8. Release of the site when the confirmatory survey verifies that release requirements have been satisfied.

The comments below are limited to preparation of the Characterization Work Plan and to the radiological safety aspects of the Health and Safety Plan.

#### 1. Page 2, Section 2, 3rd Para.

The referenced study of Oak Ridge Associated Universities should be changed to Oak Ridge National Laboratory.

#### 2. General

The characterization should include use of NUREG/CR-5849, "Manual for Conducting Radiological Surveys in Support of License Termination," for appropriate protocols for sampling and surveying. We expect your final surveys to be in compliance with unrestricted release criteria and will be conducted in accordance with this procedure. For this site it may be more cost effective to perform characterization in accordance with this document so that applicable data may be used in lieu of repeating surveys of the same areas.

Provide a discussion of those areas that will be surveyed, identify affected and unaffected areas, describe the methods and instrumentation to be used for scans, direct measurements, exposure rate measurements, and removable contamination measurements, and describe the statistical analysis to be used for data interpretation.

Enclosure



Please specifically identify the numerical residual contamination criteria you plan to use for the remediation.

3. Page 4, Section 3.3

Provide a discussion on the how instruments will be calibrated and their sensitivities for measuring the nuclides present at the site.

4. Health and Safety Plan

The health and safety plan should discuss the radiation training that will be provided to workers. 10 CFR Part 19 contains guidance for acceptable radiation training programs.

Please identify a Radiation Safety Officer (RSO) and provide the RSO's qualifications.

You have identified some individuals on your project team. However, it is unclear how your project team is organized with respect to radiological safety. Please describe the project organization with respect to radiological safety.

Your discussion of Personnel Decontamination should allow for the possibility of contamination to parts of the body other than face, hands or feet. Facilities for showering and scrubbing should be available.

Several levels of protective/personnel equipment are identified. Under what conditions will these levels be implemented?

Reports of accidents or releases of radioactive materials should be reported to NRC Region III and to other cognizant agencies concurrently with reports to the Gould Representative.

Personal dosimeters (TLDs or others) should not be issued to personnel who have not successfully completed training according to 10 CFR Part 19.

5. General

In a letter from Clevite dated October 10, 1958, Clevite staff stated that some releases to the sanitary sewerage system were made. The characterization should include surveys of sewerage lines at the facility. Drain lines from the shower room, the ventilation system, and in the area of the wall exhaust fans and any roof exhausts should also be surveyed.

Both uranium and thorium should be addressed.

Areas where waste processing took place should be identified and surveyed. The Clevite health and safety procedures, dated January 1, 1958, indicated that liquid wastes would be treated by filtration and evaporation. A letter dated May 8, 1959, indicated that solid waste combustibles will be incinerated in the controlled area. This letter amended the health and safety procedures, which stated that incineration would be performed in a vacant lot.