

STATE OF MICHIGAN



JOHN ENGLER, Governor

DEPARTMENT OF PUBLIC HEALTH

3423 N. LOGAN / MARTIN L. KING JR. BLVD.  
P.O. BOX 30195, LANSING, MICHIGAN 48909

VERNICE DAVIS ANTHONY, MPH, Director

December 17, 1993

Jack Parrott  
U.S. Nuclear Regulatory Commission  
Office of Nuclear Material Safety and Safeguards  
Division of Low-Level Waste Management  
and Decommissioning  
11555 Rockville Pike  
Rockville, Maryland 20852

Dear Mr. Parrott:

The purpose of this letter is to transmit our comments concerning the radiological aspects of the plans for intrusive field investigation work at the Hartley and Hartley site, Bay County, Michigan, as submitted to you and copied to us by RUST Environment and Infrastructure with their letter dated November 19, 1993.

Based upon a cursory staff review of the Field Sampling Plan, the Quality Assurance Project Plan, and the Health and Safety Plan, all dated November 1993, it appears that both intrusive and non-intrusive radiological measurements, sample collection, and laboratory analyses will assess the extent to which radioactive contamination exists involving significant levels of radionuclides of concern.

In addition to our continuing interest in the regulatory oversight of the Nuclear Regulatory Commission (NRC) concerning the activities at this site, we are especially interested in site characterization results that are intended to evaluate the presence of naturally-occurring radioactive materials (NORM) not regulated by the NRC. Based on the past use of the site for disposal of oil field sludge and waste water treatment sludge that potentially contain elevated NORM concentrations, it appears that specific analysis for the presence of radium-226 and radium-228, as described in the plans, will address the primary NORM nuclides of concern to this department.

To enable an opportunity to periodically observe the conduct of the planned site characterization studies, we request notification concerning the schedule for the site activities and further request that a copy of radiological field data and associated laboratory analysis results be provided to this office when available.

9401140027 931217  
PDR ADOCK 040\*\*\*\*\*  
C PDR



NK10 1/0

Jack Parrott  
December 17, 1993  
Page Two

We appreciate your support for a continuing cooperative effort to address the radiological health concerns associated with the management of this site.

Sincerely,

BUREAU OF ENVIRONMENTAL  
AND OCCUPATIONAL HEALTH



George W. Bruchmann, Chief  
Division of Radiological Health

GWB:DWM:rt

cc: Mike Jury  
Michigan Department of Natural Resources

Russ Ogle, Ph.D.  
RUST Environment and Infrastructure