

70-734



January 26, 1994  
696-2182

VIA EXPRESS MAIL SERVICE:

Mr. Charles W. Emeigh, Section Leader  
Licensing Section I  
Licensing Branch  
Division of Fuel Cycle Safety & Safeguards, NMSS  
Office of Nuclear Materials Safety & Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

**Subject: Docket No. 70-734; License No. SNM-696; GA's SVA Decommissioning Project - Request for Approval to Backfill a Portion of Trenches (TAC No. L30607)**

- References:
- 1) General Atomics' Plan titled "Soil Sampling Plan for Phase II of the SVA Decommissioning Project," dated October 21, 1993
  - 2) Asmussen, Keith E., Letter No. 696-2137 to Mr. Charles W. Emeigh, "Response to Request for Additional Information on SVA Decommissioning Project Soil Sampling Plan, (TAC No. L30607)," October 22, 1993
  - 3) Pierson, Robert C., Letter to Dr. Keith E. Asmussen, SVA Decommissioning Project Soil Sampling Plan, (TAC No. L30607)," dated October 22, 1993

Dear Mr. Emeigh:

General Atomics (GA) is in Phase II of decommissioning its SVA facility. The entire concrete floor of what was the main production area of the facility has been removed and the removal of underground drainlines is in progress. Following the removal of the underground drainlines, it will be necessary, in certain areas, to excavate and remove numerous other subsurface items such as the upper portions of pilecaps (some are about 2 feet in diameter, others are about 8 feet in diameter), concrete utility trenches and concrete vault/sump-like structures. Heavy equipment will be needed to accomplish these tasks. In order to safely and efficiently move the heavy equipment into and out of the areas where needed, it will be necessary to back-fill portions of some of the trenches that were dug while removing the underground drainlines. The contractor estimates that it will be necessary to back-fill approximately 40% of the linear feet of trenches in the southern portion of the area that had been the main production floor and approximately 25% in the northern portion.

010162

9402070222 940126  
PDR ADOCK 07000734  
C PDR

NF12  
1/0

GA's NRC-approved soil sampling plan (Refs. 1, 2 and 3) requires NRC approval prior to back-filling trenches. In particular, reference is made to the sentence starting on line four (4) of Page 5 of the subject plan:

"Soil will not be back-filled into trenches unless approved by the Nuclear Regulatory Commission (which will be deemed to signify approval by the State of California)."

Accordingly, GA hereby requests approval to back-fill up to approximately one-third of the total linear feet of trenches that have been, and will be, dug during the SVA decommissioning project. GA has, by telephone (call received by Mr. B. Kapel) and is, by copy of this letter, advising the State of California of this request.

GA included the restriction on back-filling of trenches in its plan in order to facilitate the conduct of the confirmatory survey (e.g. by Oak Ridge Institute for Science and Education) to demonstrate, on the basis of a statistical sampling approach, that GA's documented final radiological survey results are adequate to support the conclusion that the guidelines for release to unrestricted use have been met.

By limiting the back-filling of the trenches to no more than approximately one-third of the total linear feet of trenches, about two-thirds will still be open and available for surveying and sampling during the confirmatory survey. Thus, the amount of open and available non-back-filled trench will be significant and sufficient in terms of a valid random statistical confirmatory survey. No portion of any trench will be back-filled until GA has obtained and documented the necessary data to demonstrate that it, and the soil being used as fill, both meet the approved criteria for release to unrestricted use. The locations of those portions of trenches that are back-filled will be adequately marked so they can be re-excavated (in part or in total) or core samples can be obtained, if either, both or some combination are deemed necessary at the time of the confirmatory survey. With regard to the relative ease of collecting core samples, if necessary, it is noted that the drainlines are at a depth of about two (2) feet in the west and slope to a depth of about five (5) feet in the east.

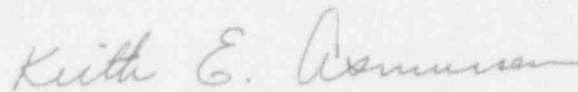
The above request has been discussed with Mr. Michael Cillis, the cognizant NRC Region V inspector for GA's SVA decommissioning project. Mr. Cillis indicated that, in his opinion, it was a reasonable request and he would be willing to recommend in favor of its approval.

The imminent need to back-fill portions of the trenches was only recently identified by the prime contractor during an evaluation of the remaining dismantlement and remedi-

ation tasks and the most efficient sequence in which to complete them. This evaluation factored in the experience gained on the project over the past several weeks. Unfortunately, this results in a need for expeditious approval of our request in order to avoid delay of the project. GA is very appreciative of your assistance in this matter and is hopeful of your early favorable response.

If you have any questions regarding this request, please contact me at your earliest convenience at (619) 455-2823.

Very truly yours,



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

KEA:shs

cc: Mr. Michael Cillis, U.S. NRC, Region V  
Mr. Robert Pate, U.S. NRC, Region V  
Mr. Robert Wilson, Project Manager, NMNS, U.S. NRC Headquarters  
Mr. Ben R. Kapel, State of California, Radiologic Health Branch (2)  
Mr. Kim Wong, State of California, Radiation Health Unit, Los Angeles