



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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LICENSEE: IRT Corporation  
San Diego, California

SUBJECT: SAFETY EVALUATION REPORT: AMENDMENT REQUEST DATED NOVEMBER 3,  
1993, RE RELEASE OF 3030 CALLAN ROAD FACILITY

Background

The 3030 Callan Road facility (located in LaJolla, California) was constructed in 1983 and owned by IRT until 1987, at which time it was sold and leased back to IRT. The facility is a standard office building with a lower floor designed for technical operations. IRT used the upper level for office space, and the lower level for operations that pertained primarily to the development of non-destructive gauges using sealed isotopic sources and X-ray machines. Operations related to SNM involved inspection systems to determine the enrichment and quality of nuclear fuel rods. The only SNM used at this facility consisted of 1192 grams of 4% enriched uranium as fuel rods and pellets, and 66 grams of 97% enriched uranium in the form of a fuel plate. The 3030 Callan Road facility is also licensed by the State of California (Radioactive Materials License 2468-80) for all utilized radioactive materials other than SNM.

IRT's current SNM license authorizes possession of SNM at both 3030 Callan Road and 8221 Arjons Road. IRT has discontinued all operations at its Callan Road facility and has decommissioned it for unrestricted use. IRT does not intend to renew its lease for the Callan Road building.

Following decommissioning cleanup, Occupational Services Inc. (San Diego) performed verification surveys for gross alpha, gross beta, and tritium activities (both direct and smearable). Mike Cillis of Region V also performed survey measurements at the facility on January 11, 1994. The only area of possible concern was a 10-inch diameter stainless steel storage tube that is embedded vertically in concrete from floor level to about 9 feet below the floor. The tube was used for the storage of sealed neutron sources. Such storage resulted in neutron activation of the tube wall within a 3-foot band whose midpoint is about 7 feet below the floor. The activation in the tube has been determined to be cobalt-60 and manganese-54 with concentration levels estimated at 60 picoCuries/gram of Co-60 and 165 picoCuries/gram Mn-54. The half-lives of Co-60 and Mn-54 are 5.26 years and 0.83 year, respectively. The State of California agreed that the facility could be released for unrestricted use provided the tube was backed-filled with concrete, and further provided that radiation readings at the floor surface following back-filling were acceptable.

### Discussion

IRT has back-filled the storage tube, and survey readings taken at the floor level and surrounding areas of the storage room showed no radiation levels above background. The results of the survey were sent to both the State of California and NRC. In a February 1, 1994, telephone conversation between State of California, Department of Health Services and NRC's Licensing Branch, the State of California confirmed that they had reviewed the survey readings and that they had released the Callan Road facility for unrestricted use without any further action required.

The building owner (TCW Realty Fund II Holding Company) of the 3030 Callan Road building has been aware of the activated storage tube, and was agreeable to leaving the tube in the ground provided it was back-filled with concrete. The owner's environmental consultant was also in agreement with this action.

### Categorical Exclusion

Based on information submitted by IRT, and information provided by Region V and the State of California, the staff has determined that the granting of the licensee's request will not adversely affect the public health and safety or the environment, and is otherwise in the public interest. Accordingly, the staff has determined that the criteria in 10 CFR 51.22(c)(11) for categorical excluding an action from an environmental review has been met. Therefore, neither an Environmental Assessment nor an Environmental Impact Statement is necessary for this proposed action.

### Conclusion/Recommendation

The staff concludes that granting the licensee's requests to (1) release the 3030 Callan Road facility for unrestricted use, and (2) amend its license by deleting 3030 Callan Road as an authorized location for use and storage of SNM, should not adversely affect the public health and safety or the environment and that it will not reduce the effectiveness of the licensee's safety program. Hence, the staff recommends that the requested amendment be granted.

### Principal Contributors

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