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Battelle
Putting Technology To Work

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Robert C. Pierson, Chief
Licensing Branch
U.S. Nuclear Regulatory Commission
Division of Fuel Cycle Safety
and Safeguards, NMSS
Washington, DC 20555-0001

Dear Mr. Pierson:

Battelle has been working aggressively to improve its Emergency Management Program and to correlate preplanned emergency response with radiological hazards that now exist at our facilities. The following paragraphs provide a summary of the program status.

Battelle Columbus Operations (BCO) conducts Research and Development (R&D) activities and Decontamination and Decommissioning (D&D) activities at two separate sites in the Columbus, Ohio area: (1) the King Avenue Site in Franklin County, and (2) the West Jefferson Site in Madison County. As a result, emergency management response is described in two master documents: "Emergency Plan, West Jefferson" issued in January 1990 and the "Emergency Plan, Columbus Campus" issued in February 1990. These two plans provide a framework and establish a uniform approach for managing Battelle emergency resources and integrating those resources with off-site emergency response agencies.

In addition, Battelle has developed and implemented the "BCLDP Emergency Management Plan, DD-93-07" as a comprehensive emergency management plan for radiological activities conducted throughout the Battelle Columbus Operation. It is administered and implemented by a series of procedures that describe in detail: (1) the responsibilities required to maintain the program; (2) the physical actions to be taken by emergency responders in order to assess and mitigate incidents which may pose hazards to life, health or property; and (3) the means by which the Emergency Management Organization (EMO) facilitates notification of local, state, and federal government agencies in compliance with all applicable regulations.

The BCLDP emergency management plan represents a significant improvement in Battelle's emergency preparedness program. This plan has been and will be updated to ensure compliance with Title 10, Code of Federal Regulations, Part 70.22(i) and to reflect changes in potential

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2.1.3.4.3 Category 3: Sequence of D&D Operations. The primary concern during decommissioning operations in Category 3 buildings will be to initially isolate the contaminated areas and prevent the spread of contamination to clean areas. The following is the general sequence of operations proposed for decommissioning Category 3 buildings:

1. Relocate any staff and/or non-nuclear operations from the areas to be decontaminated.

2. Relocate or isolate all activities from the clean areas adjacent or near the contaminated areas.

3. Establish access control areas near the contaminated areas. The access control areas will provide for change rooms and showers as required.

4. Survey and remove uncontaminated items including office furniture and laboratory equipment.

5. Perform detailed radiological surveys of the contaminated areas and the equipment in those areas. This will assist in preparing the specific decontamination procedures for specific areas.

6. Prepare a staging area for handling and packaging contaminated equipment and waste removed during the decommissioning operations.

7. Remove contaminated furniture and equipment. Decontaminate at a suitable location or dispose as radioactive waste as deemed appropriate.

8. Seal all drains, vents, and other openings from the contaminated areas to prevent the release of radioactive material during these decommissioning operations.

9. Remove exposed and contaminated plumbing, hoods, ducts, and electric equipment (including surface conduits and hanging lights) and dispose as radioactive waste.

10. Decontaminate the ceilings, floors, walls, and using detailed procedures as prepared using information obtained from the radiological surveys. The principal decontamination method will be vacuum cleaning, wiping, and removal of the surface layers from the ceilings, walls and floors. Care will be taken to control the spread of contamination by isolation and use of dust and liquid collection equipment.

11. Remediate sumps, vertical and horizontal drain lines, and sewer lines by decontamination or removal.

hazards represented by current and projected activities. It was developed to work as a compatible, complementary, constituent to the "Emergency Plan, West Jefferson" and the "Emergency Plan, Columbus Campus".

DD-93-07 supersedes the "Emergency Plans and Procedures - West Jefferson North, Decontamination and Decommissioning Operations" issued March 1990 and the "Radiological Contingency Plan (RCP) for Battelle's Columbus Laboratories. The Emergency Management Plan, DD-93-07 was prepared using NRC Regulatory Guide 3.67, "Standard Format and Content for Emergency Plans for Fuel Cycle and Materials Facilities" and NUREG 0654, FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants" as primary developmental resources.

Battelle considers its Emergency Management Programs to be well defined, workable and in compliance with all regulatory requirements. If you have any technical questions or comments, please contact Gene Roe at 614-424-4344.

Sincerely,

K.C. Brog
BMI Corporate Vice President
of Environment Safety and Health

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