

FEB 28 1994

Docket 70-1100
License SNM-1067

Mr. Robert E. Sheeran, Facilities Manager
Windsor Nuclear Fuel Manufacturing
Combustion Engineering, Inc.
1000 Prospect Hill Road
Windsor, Connecticut 06095-0500

Dear Mr. Sheeran:

SUBJECT: DECOMMISSIONING PLAN (TAC NO. L30546)

This refers to your letter dated March 30, 1993, transmitting your Decommissioning Plan.

Our review of your Plan has identified additional information that is needed before final action can be taken. The additional information, specified in the enclosure, should be provided within 30 days of the date of this letter. Please reference the above TAC No. in future correspondence related to this request.

If you have any questions regarding this matter, please contact me at (301) 504-2604.

Sincerely,

Original Signed By:

Sean Soong
Licensing Section 2
Licensing Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS

cc w/encls:
Mr. J. F. Conant, Manager
Nuclear Materials Licensing

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Request for Additional Information
Application Dated March 30, 1993
Combustion Engineering, Inc.
Docket 70-1100

GENERAL COMMENTS

1. Since the radiological survey described in the Plan is designed primarily for detecting radioactive contamination from uranium, justify that the potential for contamination from other radionuclides does not exist.
2. Segregate all survey areas into two classifications, namely, affected and unaffected areas. The survey for these two areas should be conducted in accordance with Section 4.2 of NUREG/CR-5849, "Manual for Conducting Radiological Surveys in Support of License Termination," published in June 1992.
3. The plan does not mention removable and direct beta measurements for building surfaces. Beta measurements, as well as alpha measurements, are required. The limit for uranium beta contamination is the value, in dpm/100 cm², that corresponds to 5000 dpm alpha/100 cm². Table A-1 in the plan lists the alpha/beta ratio for the enriched uranium contamination as 2.3/1. The corresponding beta limits are, therefore, 2175 dpm/100 cm² average and 6525 dpm/100 cm² maximum for direct beta and 435 dpm/100 cm² removable.
4. After the final survey is initiated, all results should be reported. A decision as to the extent of additional remediation should be based on an analysis of all survey results for a particular area. Remediation should not be limited to the immediate area surrounding an identified hot spot. Both pre- and post-remediation results should be reported. The investigation to determine the extent of additional remediation, after the initiation of the final survey, should be documented in the final survey report. Also, when a survey result in an unaffected area exceeds 25 percent of the surface contamination limits, an investigation should be conducted and additional sampling performed as necessary.

SPECIFIC COMMENTS

- Page 2-16 Section 2.6.2 - provide a schedule for completing the survey for Building 17.
- Page 3-7 Section 3.3.5 - state that the air sample shall be analyzed promptly on a daily basis when there is a potential for the individual's intake to exceed 10 DAC_{hr} in a week.

- Page 4-2 Section 4.1 - provide the procedures for instrument calibration. What are the MDA's for the instrumentation? How will instrument response in cpm be converted to dpm/100 cm²? How will background be determined?
- Page 4-3 Table 4-1 - the unrestricted release criteria for exposure rates from open land areas is not included. This limit is 10 uR/hr above background at 1 meter from the ground.
- Table 4-1 Table 4-1 - lists "fixed" alpha limits. Confirm that these limits apply to direct surface contamination measurements, which include both fixed and removable contamination.
- Page 4-4 Section 4.2 - will audible response be used during scanning to detect greater than background levels?
- Section 4.2 - provide the method for performing direct beta measurements.
- Page 4-7 Figure 4-2 - provide justification for not performing surveys in ceiling areas, other than on the molding strips and in the joints of the panels.
- Page 4-8 Section 4.2.4 - exposure rate surveys should be made above 2 meters, as well as below 2 meters.
- Page 4-9 Building 17 roof - volumetric samples of roof material should be collected and analyzed. If volumetric sampling is not necessary, provide justification for assuming that volumetric contamination is unlikely.
- Page 4-12 Sections 4.2.24 - 4.2.26 - all remediation should be completed prior to initiating the final survey. If the swale areas are classified as affected, the sampling frequency depicted in Figure 4-3 should be followed. Also, subsurface samples should be collected from the swale areas.
- Page 4-13 Section 4.3 - if survey results less than the MDA are to be reported, all results greater than the "critical level" should be clearly indicated in the report.