1992 October 14

Mr. Tony Huffert
United States Nuclear Regulatory Commission
Mail Stop 5E2
11555 Rockville Pipe
Rockville, MD 20852

RE: Bldg. 25 Remediation Project

Mr. Huffert:

The attached information provided by Alcoa and NES is a response to the deficiencies the NRC noted in the Decommissioning plan that was sent to your attention on October 9, 1992. The deficiencies were corrected in a phone conversation with you the morning of October 14, 1992, which took place with Bill Needrith and myself.

If you have any additional questions, please feel free to contact me at (216) 641-4366.

Sincerely,

M. A. Gradert
Senior Environmental Specialist

MAG/ds
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1Q. *How many, when, and where will air samples will be taken during the cleanup of the mezzanine area?*

1A. Air samples will be taken using a Radeco Hi-Vol. A minimum volume of 100 cu/ft. will be sampled. The air sample will be placed in the breathing zone of the decontamination activities. The exhaust of the air sampler will be positioned as to not disturb residual contaminated dust.

The frequency planned for taking air samples is as follows:

1. Outside Bldg. 25 to establish a baseline.
2. Inside mezzanine prior to start of decontamination activities.
3. At least one per day while decontamination is in progress.
4. Inside mezzanine after work is completed.

2Q. *Will the "exhaust" of the 5 CFM hi-vol. air sampler increase the airborne concentration of depleted uranium dust? Where will the "exhaust" be directed: out of the building, in the direction of loose contamination, etc.?*

2A. As stated above, the air sampler exhaust will be directed as to not disturb contaminated dust, ie. outside building or in center of room on an elevated platform.

3Q. *What is the "predetermined level," or action level, for donning respirators during remediation activities?*

3A. The action level for donning respirators will be:

2.4^{E-11} mci/ml Alpha
7.2^{E-9} mci/ml Beta/Gamma

These levels where taken from the N.E.S. air sample procedure approved for use at the Chemetron site in Cleveland, Ohio.

4Q. *How will air samples be analyzed and the results reported to workers so that respirators can be used to decrease intake of depleted uranium dust? How will radon activity be accounted for?*

4A. Air samples will be counted "initially" as soon as practical after taken. They will be counted using a Ludlum 2929 Alpha and Beta/Gamma scaler or equivalent. If warranted, a second count will be taken within an hour of the initial count to show the rate of decay and ensure that Radon daughters are the reason for elevated counts. The M.P.C. for Radion is 3^{E-8} if this is met or exceeded work will cease and ventilation will be installed within the mezzanine until acceptable limits are met.

5Q. *What protective clothing will be worn during remediation activities?*

5A. All personnel that enter the mezzanine during decontamination activities will be wearing: Tyvek suit, plastic booties, cotton liners, rubber gloves, dust mask (unless respirator is required)

6Q. *Will surveys of equipment located in the mezzanine area be performed and recorded prior to release for unrestricted use?*

6A. All equipment removed from the mezzanine will be surveyed by N.E.S. The surveys will be documented showing direct readings as well as smear results. Copies of the surveys will be included in the survey package for the mezzanine. Any items not meeting the release criteria will be deconned and disposed of as L.S.A. within the B-25 box.

7Q. *Section 3.3.3.7 refers to waste containers being labeled as "norm waste." This labelling is incorrect. Please verify the correct labelling of waste containers.*

7A. The B-25 L.S.A. box that will be used to contain any contaminated waste generated will be labelled as:

Radioactive L.S.A.
Class "A" Unstable
UN 2912

8Q. *Will waste generated from the mezzanine area be disposed of by NES, as indicated in the remediation plan, or by Alcoa, as indicated by Alcoa staff?*

8A. The B-25 L.S.A. box will be turned over to Alcoa and disposed of by them at the Envirocare of Utah Facility.

9Q. *Is the unrestricted release criteria for alpha 20 dpm/100 cm^2, as indicated in Section 3.2.3.8, or 200 dpm/100 cm^2?*

9A. The release criteria to be used for Alpha will be 200 dpm/cm^2 as acknowledged by Tony Huffert on our release dated 10/14/92.

The grid sizes to be used in our release survey as discussed with Tony Huffert are as follows: 1m x 1m - floor area
3m x 3m - wall and ceiling

There will be five survey locations within each grid as well as two swipes (to be taken at the highest readings).