

Docket No. 070-00133 (Terminated)
 License No. SNM-183, C-3692, C-3790,
 34-000653-01/02 (Terminated)

APR 19 1994

Mr. Kim W. Lickfield, Project Manager
 Severson Environmental Services, Inc.
 2749 Lockport Road
 Niagara Falls, NY 14302

Dear Mr. Lickfield:

The U.S. Nuclear Regulatory Commission staff has reviewed your March 3, 1994, "Characterization Work Plan for the Clevite Site, Cleveland, Ohio."

In the enclosure, we are providing to you our comments on that document. Our comments concern principally the relation between the present characterization survey and the termination survey which will ultimately be required, instrument calibration, contamination limits, the need to test for thorium residues, the areas to be surveyed, laboratory support, initiation of remediation, disposal of radioactive waste, and the air quality management portion of your health and safety plan.

Based upon our comments, you are requested to prepare and submit for approval, within 60 days, revisions to the Characterization Work Plan. Once the NRC staff has reviewed and transmitted to you approval of the revised Characterization Work Plan, you may then initiate the necessary characterization studies. Following NRC review and approval of the results and findings of the Characterization Survey, submittal of a detailed remediation work plan will then be appropriate.

If you have any questions, please call me at (301)-504-2038.

Sincerely,
 [Original signed by]
 John J. Lentz, Project Manager
 Materials Decommissioning Section
 Low-Level Waste and Decommissioning
 Projects Branch
 Office of Nuclear Material Safety
 and Safeguards

Enclosure: As stated
 cc: See Attached List w/enclosure

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Letter dated APR 19 1994

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as termination surveys if the release criteria are shown to be satisfied.

In addition to the floors and the lower two meters of the walls of the first floor machine shop and hallway areas, other potentially contaminated areas that will require characterization, as noted in our earlier comments founded on a review of the license files, include nearby roofs, in consideration of possible waste incineration performed in the controlled area, as well as the sewerage lines, drains from the shower room, the ventilation system, the wall exhaust fans and roof exhausts, and the immediate vicinity of these facilities. The second floor research area where thorium was used also requires characterization.

Special attention should be paid to corners, the junctions of walls and floors, and cracks and joints in the flooring. Where contamination is found in cracks and joints of concrete flooring, coring of the concrete and the subsurface may be necessary. Please provide information about proposed procedures for the analysis of smears, cored material and soils.

3. P. 6, Section 3.4 *Affected Areas*

The survey plan notes that "identified elevated areas" will be evaluated, and that after remediation, systematic measurements of surface activity will be performed at 1 meter intervals. Please discuss in detail the procedures to be used for evaluation of the "elevated areas," including use of any of the more detailed analyses discussed in Comment No. 2, above. Please note that remediation should not commence until the site characterization report has been approved, although minor remediation which occurs incidental to characterization (e.g., the simple removal of dust or dirt residues not requiring sophisticated physical, mechanical or chemical operations) will be acceptable if the quantity and concentration of contamination removed is properly documented. Such documentation will not relieve Clevite from the obligation to include areas of such minor remediation from inclusion in the termination survey required by NUREG/CR-5849.

4. P. 7, Section 3.5

Contamination limits for unrestricted use include the total activity present; therefore detection efficiencies should be based on 4π geometry. The efficiencies quoted for the 44-9 pancake probe should be adjusted for 4π geometry (cf. Appendix D, Section E.4, which indicates that efficiencies will be calculated on the basis of 2π geometry). Please confirm that the procedures specified in Appendix D, properly adjusted for 4π geometry, will be used for instrument calibration.

If it is proposed that any characterization survey data also be used for the termination survey, it will be necessary to determine and report the Minimum Detectable Activity (MDA) for the survey instrumentation you plan to use as well as the equation used to calculate the MDA and to

Worker Training. (We note that this issue is later clarified in Section 14.B.1.a of the Health and Safety Plan.)

9. P. 30, Section 14

What action levels will be used for initiating an investigation of air sampling results? Are the particle air samples described in 14.B.2 intended to demonstrate compliance with 10 CFR 20.1302?