SEP 28 1982

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2. DCS 9/29/82 Return # 2 Jugan 396-55

Gentlemen:

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PDR

United Nuclear Corporation

One Narragansett Trail

ATTN: Mr. R. J. Gregg, Plant Manager

UNC Recovery Systems

Wood River Junction, RI 02994

Your letter of September 7, 1982, described preventive maintenance activities UNC Recovery Systems plans to take on the roof and steelworks within the UNC facility. Summaries of survey results for fixed and removable alpha activity, removable beta-gamma activity, and beta-gamma dose rates were provided.

Before we can agree to the adequacy of the surveys, we require that a detailed survey report be forwarded to us. This includes a map showing grid sizes and locations, and survey results for each grid. We note that UNC did not provide survey data for total beta-gamma activity as required by Table 1 of the Guidelines for Decontamination of Facilities and Equipment (copy enclosed). These data should be provided in the detailed survey report.

Paragraph 5 of the Guidelines describes additional information to be submitted in the survey report. Because UNC is decommissioning the entire site, the NRC plans to conduct a close out survey. We recommend that you schedule sufficient time after submitting the report so that our Region I Office or its contractor can conduct such a survey prior to painting or relagging.

These comments were discussed by your Mr. Helgeson and Mr. Bidinger of my staff on September 16, 1982.

Sincerely,

Original Signed By: W. T. Crow

W. T. Crow, Section Leader Uranium Process Licensing Section Uranium Fuel Licensing Branch Division of Fuel Cycle and Material Safety

	Enclosure	: As stated		and the second		
OFFICE	FCUF 974/5	FCUF 🎔	FCUF USC			
SURNAME)	GBidinger/cj		WTCrow 9/2/182			
	(10-80) NRCM 0240	·····	OFFICIAL	RECORD C	OPY	 USGPO: 1981-335-960

UNC RECOVERY SYSTEMS



Division of United Nuclear Corporation A UNC RESOURCES Company One Narragansett Trail Wood River Junction, Rhode Island 02894 Telephone 401 364-7701

Revel 9/13/82

RJG: 82-41

September 7, 1982

Need DeTRILED Survey Ppt

MAN do EARLY DETOBER

United States Nuclear Regulatory Commission Mr. W. T. Crow, Section Leader Wilste Building 7915 Eastern Avenue, Silver Spring, MD 20910

WILL NOT DO ANYTHING WITHOUT DETAILED REPORT

Gentlemen:

This letter is written to provide information on and justification for, two actions UNC Recovery Systems deems imperative and intends to take as preventive maintenance measures. These actions involve two areas of the facility structures.

- The roof over the main processing building and office areas.
- The steelwork (I-beams, doors, door bucks, etc.) in the process area. This includes the main processing bay, the pickle liquor room, and the columns rooms.

DISCUSSION

Item No. 1, Roof Areas

The roof areas of the main processing building have been subjected to concentrated traffic and damage due to the decommissioning processes. Fans, motor mounts, and turnbuckle anchors have been removed and their removal has destroyed the integrity of the roofing system. This is allowing considerable water and moisture into the building and is also accelerating the rusting of the exposed steel surfaces.

We intend to have the fan and duct penetrations sealed and other damaged areas repaired with roofing insulation and the entire building roof area recovered with membrane and asphalt.

The entire roof area has been surveyed in accordance with the NRC guidelines issued for the decontamination of this facility. The results of the survey are described below and documentation is maintained at this facility. Letter, RJG 82-41, dated September 7, 1982

Page 2

	DPM per 100 cm ²				
	Measured		Limit		
	Avg.	Max.	Avg.	Max.	
Fixed Alpha	2000	4000	5000	15000	
Removal Alpha	10	~ 19		1000	
Removable Beta-Gamma	10	25		1000	
Penetrating Radiation - Beta-Gamma at one	m	rem/hr	mra	d/hr	
centimeter above surface	0.02	0.03	0.2	1.0	

Item No. 2, Steelwork

The underside of the steel roof decking and all of the structural steel in the process areas has been grit blasted to remove paint and contamination and the main domestic water header pipes have had all of the insulation (lagging) removed and the pipe has been grit blasted.

The humidity and moisture are taking their toll on all of the exposed steel surfaces. In order to prevent any further rusting and deterioration in this area, we intend to have these surfaces primed and painted and the main water headers relagged.

The underside of the roof decking and the structural steel in this area has been surveyed in accordance with the NRC guidelines issued for the decontamination of this facility and in accordance with the guidelines suggested in NUREG CR/2082 entitled Monitoring for Compliance with Decommissioning Termination Criteria. The results of the survey are described below and documentation is maintained at this facility.

		DPM pe	$r 100 \text{ cm}^2$	
	Measured			mit
	Avg.	Max.	Avg.	Max.
Fixed Alpha	2000	4500	5000	15000
Removable Alpha	50	150		1000
Removable Beta-Gamma	50	250	14	1000
Penetrating Radiation - Beta-Gamma at one	mre	m/hr	mrad	/hr
centimeter above surface	0.1	0.15	0.2	1.0

Appendix B, Guidelines for Decontamination of Facilities and Equipment, paragraph 2 states:

Radioactivity on equipment or surfaces shall not be "2. covered by paint, plating, or other covering material unless contamination levels, as determined by a survey and documented, are below the limits specified in Table I prior to applying the covering. A reasonable effort must be made to minimize the contamination prior to use of any covering."

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As we have performed considerable decontamination of the subject areas and verified the effectiveness of this work by documented surveys, we feel that the actions we intend to take are justified and reasonable. The preventive maintenance work will begin at our earliest convenience. As additional similar circumstances arise, it would be our intention to act in a similar manner.

If there are any questions concerning the intended preventive maintenance actions, we will be pleased to discuss them with you at your convenience.

Very truly yours, UNC Recover Systems

R. J. Gregg Plant Manager

cc: G. O. Amy K. A. Helgeson D. McFadden File (2)