

FEB 16 1994

Whittaker Corporation  
ATTN: Gordon J. Louttit  
Vice President and  
Assistant General Counsel  
10880 Wilshire Boulevard  
Los Angeles, CA 90024

Dear Mr. Louttit:

SUBJECT: WHITTAKER CORPORATION RESPONSE TO COMMENTS REGARDING PROPOSED  
CHARACTERIZATION PLAN - DECEMBER 6, 1993

This is in reference to your December 6, 1993, response to our questions of  
October 5, 1993, regarding Whittaker Corporation's proposed Characterization  
Plan. In our letter of October 5, 1993, we provided you with a list of 15  
general comments and 14 specific comments as well as a copy of the new  
recordkeeping rule.

My staff has reviewed your comments and have some additional questions which  
are provided in the attached enclosure. Please provide your response within  
30 days of the date of this letter.

If you have any questions, please contact Louis Bykoski at (301) 504-2560.

Sincerely,  
[Original signed by]  
John H. Austin, Chief  
Decommissioning and Regulatory  
Issues Branch  
Division of Low-Level Waste Management  
and Decommissioning  
Office of Nuclear Material Safety  
and Safeguards

Enclosure:  
As stated

(Ticket # D93-0081)

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RESPONSE TO WHITTAKER CORPORATION  
LETTER OF DECEMBER 6, 1993

General Comments

1. The Whittaker response to NRC's comments references the old version of 10 CFR Part 20 (10 CFR 20.1 - 20-602). The Characterization Plan submitted by Whittaker on May 14, 1993, also references the old version of 10 CFR Part 20. Note that the new version of 10 CFR Part 20 (10 CFR 20.1001 - 20.2401) is mandatory as of January 1, 1994. The Health and Safety Procedures contained in Section 4 of the Characterization Plan and any other part of the Characterization Plan that references 10 CFR Part 20 must be revised to reflect the requirements of the new 10 CFR Part 20. (Please refer to the information notice sent to you May 10, 1993.)
2. Please describe the procedure control process for the Whittaker site characterization project. Who is required to approve the procedures? At what frequency will the procedures be reviewed?
3. In the Whittaker responses to NRC comments 11 and 15, ARC Health and Safety Procedures 1.8 and 1.9 were referenced. These procedures are not included in the May 14, 1993, Characterization Plan. Please describe the posting and control program and the ALARA program, or submit procedures 1.8 and 1.9.

Specific Comments

1. Comment 1, page iv, Program Summary

What is the basis for using <15 pCi/gm as the criteria? What radionuclides does this value apply to? Did you intend that this value be the unrestricted release limit for thorium (10 pCi/gm total thorium)?

2. Comment 9, page 28, Section 9.4.1

The equation for calculating the well volume appears to still be incorrectly presented. The equation gives a distance unit on the left-hand side and square of distance on the right-hand side. Further, the well volume should be a volumetric unit (i.e., gallons, cubic feet, etc.), and not the height of the water in the well screen and filter pack.

Using the variables in your response, it appears that the volume of water in the well should be given by:

$$\text{Volume of well water} = 7.48 \pi H_1 [(R_1^2 - R_2^2)\phi + R_2^2] \text{ gallons}$$

If the above equation is not acceptable, please provide a derivation for your equation.

Whittaker Corporation  
Docket No. 40-7455, License No. SMA-1018

Letter dated FEB 1 1964

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