



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

Docket No. 030-18276  
License No. 34-17726-02

FEB. 23 1994

Mr. Erwin J. Odeal  
Executive Director  
Northeast Ohio Regional Sewer District  
3826 Euclid Avenue  
Cleveland, Ohio 44115-2504

SUBJECT: COBALT-60 CONTAMINATION IN FILL AREA, EASTERLY PLANT

Dear Mr. Odeal:

This letter is in response to your correspondence, dated February 4, 1994, to Mr. Gary Shear, regarding the cobalt-60 (Co-60) contamination found at your Easterly Plant property. In your letter you informed us of the contamination and described the concentrations of radioactive material in the samples taken.

In response to the discovery of Co-60 contamination at the Easterly Plant, NRC is planning to reopen the 1991 allegation regarding the burial of radioactive material in the 1960's at a site near Lake Erie (later determined to be Northeast Ohio Regional Sewer District property.) We will keep you informed of the status of these followup activities.

Your consultant, Dr. B. Koh, provided us a copy of the preliminary survey report on the proposed construction area. We also request that you provide us the outline of the follow-on sampling plan that Dr. Koh is preparing.

Dr. Koh also informed us that, during times of high sewer flow rates, sewage has been diverted directly into Lake Erie. We would appreciate your providing dates of such releases to us for further followup.

We also appreciate your offer to coordinate with us when you do your follow-on surveys. After you develop your schedule for the follow-on surveys, please provide us a copy of this schedule so we can perform additional surveys and sampling at the same time. In the event that further radioactive contamination is found at the Easterly Plant or at any other NORSD facility, we would appreciate prompt notification so that we can assess its safety significance.

As an update, the Division of Industrial, Medical and Nuclear Safety, which is responsible for evaluating your 10 CFR 2.206 petition dated March 3, 1993, will be considering Dr. Koh's report on the Co-60 inventory at your Southerly Plant in its decision of the petition. If you have any questions regarding the status of this petition, please contact Mr. Joseph DeCicco at (301) 504-2067.

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Mr. Erwin J. Odeal

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As discussed between William Axelson of the NRC Region III staff and Tom Lenhart of your staff, we will be happy to meet with you or members of your staff to discuss the contamination at the Easterly and Southerly Plants. Mr. Sam Nalluswami will contact you to schedule a suitable time.

For your information, we are enclosing a copy of the NRC INFORMATION NOTICE 94-07: SOLUBILITY CRITERIA FOR LIQUID EFFLUENT RELEASES TO SANITARY SEWERAGE UNDER THE REVISED 10 CFR PART 20. This Information Notice was recently issued and provided to all NRC licensees.

If you have any questions regarding this letter, please contact Mr. Sam Nalluswami of my staff on (301)504-2502.

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 No. D-940012

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DATE	2-15/94	H	2/15/94		2/16/94	2/15/94	H	2/23/94	

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS  
WASHINGTON, D.C. 20555

January 28, 1994

NRC INFORMATION NOTICE 94-07: SOLUBILITY CRITERIA FOR LIQUID EFFLUENT  
RELEASES TO SANITARY SEWERAGE UNDER THE  
REVISED 10 CFR PART 20

Addressees

All byproduct material and fuel cycle licensees with the exception of licensees authorized solely for sealed sources.

Purpose

The U.S. Nuclear Regulatory Commission is issuing this information notice to emphasize the changes in 10 CFR Part 20 with respect to liquid effluent releases to sanitary sewerage and to encourage you to prepare for these revisions.\* It is expected that licensees will review this information for applicability to their operations, distribute it to appropriate staff, and consider actions to prepare for, and incorporate, these changes. Suggestions contained in this information notice are only recommendations; therefore, no specific action nor written response is required.

Background

On December 21, 1984, NRC released an information notice documenting several instances of reconcentration of radionuclides released to sanitary sewerage (IN No. 84-94, "Reconcentration of Radionuclides Involving Discharges into Sanitary Sewage Systems Permitted under 10 CFR 20.303"). Several other instances have since occurred in Portland, Oregon; Ann Arbor, Michigan; Erwin, Tennessee; and Cleveland, Ohio. The primary contributors, in some of these cases, appear to have been insoluble materials released as dispersible particulates or flakes. This issue was addressed again on May 21, 1991, by NRC, when it published its revision of Part 20 in the Federal Register (56 FR 23360), which removed insoluble non-biological material from the types of material that may be released to sanitary sewerage. Relative to this issue, the NRC Office of Nuclear Regulatory Research is conducting a study to clarify the mechanisms underlying reconcentration in sanitary sewerage and sewage treatment facilities.

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\* Sanitary sewerage is defined by 10 CFR 20.1003 as "a system of *public sewers* for carrying off waste water and refuse, but excluding sewage treatment facilities, septic tanks, and leach fields owned or operated by the licensee [emphasis added]."

### Description of Circumstances

To help prevent further reconcentration incidents at public sewage treatment facilities, 10 CFR 20.2003(a)(1), effective January 1, 1994, was written as follows:

#### §20.2003 Disposal by release into sanitary sewerage

(a) A licensee may discharge licensed material into sanitary sewerage if each of the following conditions is satisfied:

(1) The material is readily soluble (or is readily dispersible biological material) in water; and...

However, this revision to Part 20 did not contain an operational definition of solubility, and this precipitated many questions, from licensees, concerning how the solubility of a material may be demonstrated. Without the ability to demonstrate compliance, these licensees were unable to determine whether new procedures should be developed, new treatment systems installed, or whether they should apply for an exemption, based on the principle of maintaining all doses as low as is reasonably achievable (ALARA).

### Discussion

In some of the known reconcentration incidents, the greatest reconcentrations appear to have been due to compounds released to sanitary sewerage that were not soluble. There are many approaches that may be used to determine a chemical compound's solubility in water. The following discusses two of the more common approaches:

#### 1. Direct Determination of Compound Solubility Class, Formal Solubility, or Solubility Product ( $K_{sp}$ )

This approach would be applicable whenever there is sufficient knowledge of the chemical form of all materials contained in the liquid effluent at the point of release. With this knowledge, it would be possible to use one (or more) of the following methods:

##### (a) Solubility Class Determination:

The solubility class of the compound to be released could be determined directly from common literature data (e.g., *Handbook of Chemistry and Physics* - CRC Press, and *Lange's Handbook of Chemistry* - McGraw-Hill Book Company). If a compound is classified as "v s" (very soluble) or "s" (soluble), this would indicate the compound is "readily soluble." On the other hand, if it is classified as "i" (insoluble), "sl s" (slightly soluble), or "v sl s" (very slightly soluble), this would indicate materials that are "not readily soluble." Certain compounds are designated as class "d" (decompose). If the decomposed species of these compounds are classified as either "v s" or "s," this would indicate that the parent compound is "readily soluble." If these decomposed species are simple ions, such compounds (class "d") should be considered "readily soluble."

(b) Solubility Product ( $K_{sp}$ ) Determination:

The solubility product constant of the compound could also be used to determine if a compound is readily soluble in water. The solubility product constant,  $K_{sp}$ , for a strong electrolyte  $M_mA_a$ , is expressed as:

$$K_{sp} = [M]^m [A]^a$$

where  $[M]$  and "m" are the ionic concentration (mole/liter) and the number of moles, respectively, of the dissolved cation; and  $[A]$  and "a" are the ionic concentration and the number of moles, respectively, of the dissolved anion.

For a simple electrolytic compound, with one mole of a dissolved cation species and one mole of a dissolved anion species, a  $K_{sp}$  greater than  $1.00 \text{ E-}05 \text{ mole}^2/\text{liter}^2$  would indicate that a compound is "readily soluble." For other compounds with more complex dissolution reactions (i.e., more than one mole dissolved for each species and/or more anionic or cationic species present in the dissolved products), the  $K_{sp}$  constant would increase exponentially, based on the number of moles and/or the number of dissociated species. For example, if three moles are present (two for the anion and one for the cation), the unit of  $K_{sp}$  would be  $\text{mole}^3/\text{liter}^3$ , and the corresponding  $K_{sp}$  would be  $(1 \text{ E-}05)^{3/2}$  or  $3.2 \text{ E-}08 \text{ mole}^3/\text{liter}^3$ ; the same principle could be applied for more complex dissolution reactions.

## (c) Formal Solubility Determination:

Compound solubilities (g/100 ml or mole fraction per 100 ml) are also listed in the chemical literature. From a review of general scientific literature, "formal solubilities" greater than  $0.003 \text{ mole/liter}$  would indicate that a compound is "readily soluble."

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\*\* The general relation between the formal solubility,  $S_f$ , and the solubility product,  $K_{sp}$ , of a strong electrolyte  $M_mA_a$  in water is given by:

$$S_f = \sqrt[m+a]{\frac{K_{sp}}{m^m a^a}},$$

where  $K_{sp}$  is the solubility product,  $[M]$  is the molar concentration of the metal ion (cation),  $[A]$  is the molar concentration of the anion, "m" is the number of moles of dissolved cation per mole of dissolved substance, and "a" is the number of moles of the dissolved anion per mole of dissolved substance.

For further discussion on the determination of solubility products and formal solubility, refer to Chapter 6, "Precipitation and Dilution," from Water Chemistry, by Vernon L. Snoeyink and David Jenkins (John Wiley and Sons: 1983) or texts relating to physical and/or analytical chemistry.

Formal solubilities less than 0.003 mole/liter would indicate compounds that are "not readily soluble."

It should be pointed out that all values mentioned above (e.g., solubility class, formal solubility, and solubility product) correspond to measurements taken under standard conditions (e.g., 25°C, 101.3 kPa, pH of 7, and  $E_n$  of 0).

## 2. Filtration and Radiometric Analysis of Suspended Solids

This approach may be used if knowledge of the chemical form of all materials contained in the liquid effluent at the point of release is incomplete. It is most applicable when releases are made in a batch mode. This approach involves the use of standard laboratory procedures to test representative samples of the waste stream for the presence of suspended radioactive material.

The following two laboratory procedures were developed specifically to determine the suspended solids content of water: ASTM Method D 1888-78, "Standard Test Methods for Particulate and Dissolved Matter, Solids, or Residue in Water," and the American Public Health Association's Method 7110, "Gross Alpha and Gross Beta Radioactivity (Total, Suspended, and Dissolved)" from Standard Methods for the Examination of Water and Wastewater. It should be noted that ASTM Method D 1888-78 was developed to measure the total suspended solids content of water, not just the radioactive portion. In either case, activity in the suspended solids portion of effluent greater than that found in similarly processed background water samples would indicate the presence of insoluble radioactive material.

Whether one of the above approaches or a self-developed alternative is used, it is a good health physics practice to document this approach in the form of a procedure. Procedures such as these usually include provisions for the documentation of any models, calculations, analytical measurements, and/or quality control measures used. This information is usually maintained with the applicable release records, to demonstrate that the developed procedure will ensure compliance with the regulations.

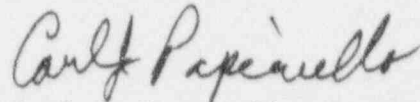
If material to be released would not qualify as being "readily soluble," 10 CFR 20.2003(a)(1) would prohibit release to sanitary sewerage unless an exemption has been granted. Exemptions will be judged on a case-by-case basis, when it is demonstrated that release to sanitary sewerage is in accordance with the ALARA principle, consistent with applicable regulations, and in the public interest.

It is expected that licensees will review this information for applicability to their operations, and consider actions, as appropriate to their licensed activities. However, suggestions contained in this information notice are not NRC requirements; therefore, no specific action nor written response is required.

If you have any questions about the information in this information notice, please contact one of the technical contacts listed below or the appropriate regional office.



Robert F. Burnett, Director  
Division of Fuel Cycle Safety  
and Safeguards  
Office of Nuclear Material  
Safety and Safeguards



Carl J. Paperiello, Director  
Division of Industrial and  
Medical Nuclear Safety  
Office of Nuclear Material  
Safety and Safeguards

Technical contacts: Rateb (Boby) Abu-Eid, NMSS  
(301) 504-3446

Cynthia G. Jones, NMSS  
(301) 504-2629

Attachments:

1. List of References
2. List of Recently Issued NMSS Information Notices
3. List of Recently Issued NRC Information Notices

REFERENCES

Annual Book of ASTM Standards. Volume 11.01, "Water (I)." American Society for Testing and Materials, Easton, MD, 1989.

CRC Handbook of Chemistry and Physics. CRC Press, Inc., Boca Raton, FL, 65<sup>th</sup> ed, 1984.

Lange's Handbook of Chemistry. McGraw-Hill, Inc., New York, NY, 13<sup>th</sup> ed, 1985.

Snoeyink, Vernon L. and David Jenkins, Water Chemistry. John Wiley & Sons, Inc., New York, NY, 1980.

Standard Methods for the Examination of Water and Wastewater. American Public Health Association, Washington, DC, 17<sup>th</sup> ed, 1989.



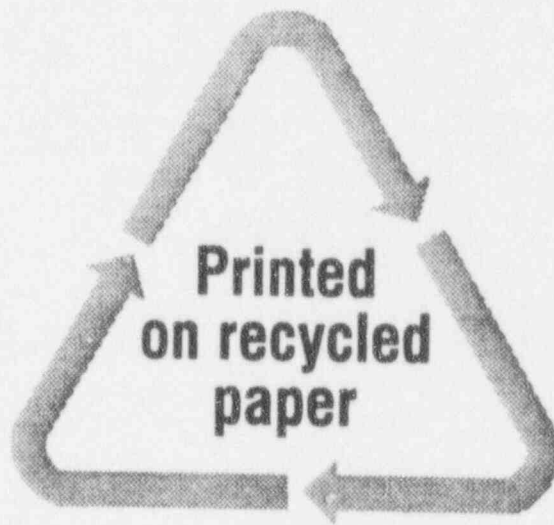
LIST OF RECENTLY ISSUED  
 NMSS INFORMATION NOTICES

Information Notice No.	Subject	Date of Issuance	Issued to
93-100	Reporting Requirements for Bankruptcy	12/22/93	All U.S. Nuclear Regulatory Commission licensees.
93-80	Implementation of the Revised 10 CFR Part 20	10/08/93	All byproduct, source, and special nuclear material licensees.
93-77	Human Errors that Result in Inadvertent Transfers of Special Nuclear Material at Fuel Cycle Facilities	10/04/93	All nuclear fuel cycle licensees.
93-69	Radiography Events at Operating Power Reactors	09/02/93	All holders of OLs or CPs for nuclear power reactors and all radiography licensees.
93-60	Reporting Fuel Cycle and Materials Events to the NRC Operations Center	08/04/93	All fuel cycle and materials licensees.
93-50	Extended Storage of Sealed Sources	07/08/93	All licensees authorized to possess sealed sources.
93-36	Notifications, Reports, and Records of Misadministrations	05/07/93	All U.S. Nuclear Regulatory Commission medical licensees.
93-31	Training of Nurses Responsible for the Care of Patients with Brachytherapy Implants	04/13/93	All U.S. Nuclear Regulatory Commission medical licensees.
93-30	NRC Requirements for Evaluation of Wipe Test Results; Calibration of Count Rate Survey Instruments	04/12/93	All U.S. Nuclear Regulatory Commission medical licensees.

LIST OF RECENTLY ISSUED  
 NRC INFORMATION NOTICES

Information Notice No.	Subject	Date of Issuance	Issued to
94-06	Potential Failure of Long-Term Emergency Nitrogen Supply for the Automatic Depressurization System Valves	01/28/94	All holders of OLs or CPs for boiling water reactors.
93-85, Rev. 1	Problems with X-Relays in DB- and DHP-Type Circuit Breakers Manufactured by Westinghouse	01/20/94	All holders of OLs or CPs for nuclear power reactors.
94-05	Potential Failure of Steam Generator Tubes with Kinetically Welded Sleeves	01/19/94	All holders of OLs or CPs for pressurized water reactors (PWRs).
94-04	Digital Integrated Circuit Sockets with Intermittent Contact	01/14/94	All NRC licensees except licensed operators.
94-03	Deficiencies Identified during Service Water System Operational Performance Inspections	01/11/94	All holders of OLs or CPs for nuclear power reactors.
94-02	Inoperability of General Electric Magne-Blast Breaker Because of Misalignment of Close-Latch Spring	01/07/94	All holders of OLs or CPs for nuclear power reactors.
94-01	Turbine Blade Failures Caused by Torsional Excitation from Electrical System Disturbance	01/07/94	All holders of OLs or CPs for nuclear power reactors.
93-101	Jet Pump Hold-Down Beam Failure	12/17/93	All holders of OLs or CPs for boiling-water reactors.
93-100	Reporting Requirements for Bankruptcy	12/22/93	All U.S. Nuclear Regulatory Commission licensees.

OL = Operating License  
 CP = Construction Permit



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