

30-18276

Docket No. 40-18276

MAY 18 1994

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

Dear Mr. Odeal:

SUBJECT: NORTHEAST OHIO REGIONAL SEWER DISTRICT/SOUTHERLY PLANT - SITE CHARACTERIZATION PLAN

We reviewed the responses dated February 24, 1994, to the Nuclear Regulatory Commission staff comments on the Site Characterization Plan, provided by B. Koh & Associates, Inc., in connection with the remediation program at the Northeast Ohio Regional Sewer District's Southerly Plant. The majority of the responses are satisfactory; however, some items require further clarification and additional information as shown in the enclosure.

A copy of this correspondence is also being sent to Mr. T. G. Adams of B. Koh & Associates. If you have any questions, please contact Sam Nalluswami of my staff at (301) 415-6694.

Sincerely, *Original Signed By*

John H. Austin, Chief  
Low-Level Waste and Decommissioning  
Projects Branch  
Division of Waste Management  
Office of Nuclear Material Safety  
and Safeguards

cc: T. Adams, B. Koh & Assoc.  
H. Brugger, ODOH  
E. Ball, Cuyahoga County  
Board of Health  
J. Berger, ORISE  
D. Schregardus, Ohio EPA

Enclosure: As stated

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COMMENTS ON RESPONSES DATED FEBRUARY 24, 1994

Page 1 of 14 of Responses

- b. The issue regarding the confidence level for identifying "hot-spots" has not been adequately addressed. The intent of the earlier comment was that Northeast Ohio Regional Sewer District should estimate the probability of missing "hot-spots" of a given concentration and size using the sampling program described in the plan and the preliminary results. The response provided by B. Koh & Associates (BKA) does not discuss this particular aspect of the contamination situation.
- c. While calibration of the Bicon microrem meter with Cs-137 will not likely result in significant difference when measuring Co-60 gamma energies, the same probably cannot be said for the Ludlum microR meter, which utilizes a sodium iodide detector which is energy dependent. How is the energy dependence of NaI detectors to be accounted for during calibration? Also, provide the types of probes in addition to the instrument make and model number.

Page 3 of 14 (Item 1) and Page 5 of 14 (Item 7) of Responses

The responses to these two comments appear to be in conflict. Please clarify. If NORSD is not planning on conducting characterization of Imhoffs, aeration tanks, or the west incinerator bank at this time, please justify.

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The west boundary for the North Fill Area is not provided. The last word should be "west" instead of "east" on the third line of para 1 of Section 3.2.2, Page 3-4, of the Site Characterization Plan.

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- b. It is not convincing that monitoring wells are not needed around Lagoons A, B, and C. Please provide results of samples collected in clay liner indicating that there was no evidence of cobalt-60 migration.

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We understand "future site characterization efforts" are those NORSD/SP is proposing to do at the Southerly Plant.

Enclosure