



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

APR 22 1991

Ms. Cynthia A. Norris  
Law Department  
Chevron Corporation  
P.O. Box 7141  
San Francisco, CA 94120-7141

Dear Ms. Norris:

This letter is in response to your letters of January 2 and January 24, 1991, to Mr. Glen Sjoblom of the U.S. Nuclear Regulatory Commission (NRC). Our area of mutual interest is the prompt cleanup of residual radioactive contamination at a property at Pawling, New York, formerly used by General Atomic Company under NRC License No. SNM-871 (Docket No. 70-903). This license was terminated by the NRC on July 14, 1975, after an incomplete cleanup by the licensee. As you know, General Atomic Company was renamed as Valley Pines Associates (VPA) which is owned, in part, by Chevron U.S.A., Inc. As the immediate successor in interest of the last licensee, we are looking to Valley Pines Associates to perform the needed site remediation.

To allow us to communicate directly with VPA, I ask that you quickly provide us with the names, phone numbers, and addresses of: (1) the VPA corporate officer who will be responsible for this matter; and (2) the VPA employee who will manage the cleanup activity. If Chevron Corporation will provide for the cleanup on behalf of VPA, please provide us similar contacts within the Chevron organization.

Your letter of January 2 requests copies of two documents: (1) the licensee's final survey report by the licensee's contractor ATCOR, Inc.; and (2) the Oak Ridge Associated Universities' (ORAU) July 1988 report, "Radiological Survey of the Nuclear Lake Site, Pawling, New York," which documents survey work performed by ORAU September 18-27, 1986, on behalf of the National Park Service [(NPS), the current site owner]. Copies of these two documents are enclosed.

Your letter of January 24 contained a series of four questions which are addressed in turn below:

1. Appropriate Cleanup Levels:

For surface contamination in buildings and on equipment, the NRC guidance contained in Appendix D of the enclosed ORAU report remains current. Our practice is to also require that gamma radiation not exceed background by more than 5 micro-R/hr one meter from building surfaces. For soil contamination, by plutonium, a level of 25 pCi/g would be acceptable if met. For radioactive cesium-137 in soil, an acceptable cleanup level would be 7.5 pCi/g. These limits should be reduced proportionately where contamination by both species is present. These numbers are based on preliminary results from a draft report which, when finalized later this summer, will provide a technical basis for establishing similar limits in NRC regulations.

2. Supplemental Site Assessment:

The 1986 ORAU survey at the Pawling site was essentially a screening effort as opposed to a comprehensive site survey and characterization. Additional survey work would be necessary to assure that site remediation would be comprehensive, and not miss small pockets or bodies of contamination. Additional survey work needed includes the following:

- Determination of the depth of floor contamination in the concrete floors where contamination was found in the former plutonium laboratory and the Multiple Failure Building (to facilitate cleanup).
- Characterization of the physical extent of soil contamination about points where excess soil contamination was found.
- Recovery and analysis of one or more of the metallic objects from the bottom of Nuclear Lake to confirm the absence of solid nuclear waste.

The details of an appropriate survey program would have to be developed. However, to the extent it is possible for us to do so, we would arrange for discussions to be held involving you, VPA, our staff, and ORAU to assist in defining an appropriate site survey plan.

3. Disposal Site:

We do not know if your interest in access to a U.S. Government-owned disposal site can be accommodated. In this regard you should contact the U.S. Department of Energy (DOE). Our project manager on this case is Dan E. Martin, who can be reached at telephone number (301) 492-0557 in our offices in Rockville, Maryland. Mr. Martin will assist you in contacting DOE if you desire.

4. Release for Unrestricted Use:

If the cleanup needed is completed in a prompt, effective and voluntary manner, and is performed in accordance with NRC requirements for health and safety protection of workers and control of radioactive material, we would not require the work to be done under an active NRC license. Upon completion of cleanup activities achieving cleanup to levels we have agreed on in advance, and confirmation of that by the NRC, we would declare the areas decontaminated to be suitable for unrestricted use. Following an affirmative NRC confirmation survey of the areas cleaned up, the NRC will issue a report to this effect.

Cynthia A. Norris

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I am sure you understand the need to provide for a prompt and effective cleanup of the residual contamination at the Pawling site. I am also sure that we can rely on you and Chevron Corporation to act responsibly in this matter. At your earliest opportunity, please provide us appropriate contacts so we can arrange for a meeting to discuss plans and schedules for the needed site survey and cleanup activities.

Sincerely,

(SIGNED) RICHARD L. BANGART

Richard L. Bangart, Director  
Division of Low-Level Waste Management  
and Decommissioning, NMSS

Enclosures: As stated

cc: President, Valley Pines Associates  
William Sanders, National Park Service  
Paul J. Merges, NYSDEC

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PDR YES  NO  Category: Proprietary  or CF Only   
 ACNW YES  NO

SUBJECT ABSTRACT: PROMPT CLEANUP OF CONTAMINATED PROPERTY AT PAWLING, NY SITE

\*SEE PREVIOUS CONCURRENCE

OFC :LLDR*	:LLDR*	:LLDR*	:OGC*	:LLWD	:NMSS	:LLWD
NAME:DMartin	:TCJohnson	:JAustin	:RFonner	:JGreeves	:RBernero	:RBangart
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DM/PAWLING CLEANUP

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