

CUYAHOGA COUNTY BOARD OF HEALTH

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CLEVELAND, OHIO 44115-1882

TIMOTHY E. HORGAN, M.P.H.
HEALTH COMMISSIONER

040-8724

(216) 443-7500

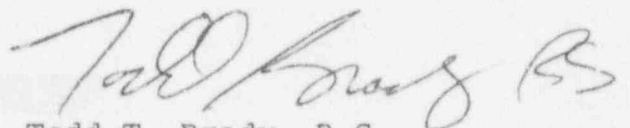
January 30, 1995

Mr. Timothy C. Johnson, Section Leader
Materials Decommissioning Section
Low-Level Waste and Decommissioning Projects Branch
Division of Waste Management
Office of Nuclear Material Safety and Safeguards
United States Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Mr. Johnson:

Please find enclosed comments from the Cuyahoga County Board of Health on the Chemetron Corporation package dated Monday, December 19, 1994. These comments are in regards to Chemetron's response to Comments on the Harvard Avenue and Bert Avenue final site remediation plan. If you have any questions, please contact us at (216) 443 - 7520.

Sincerely,



Todd T. Brady, R.S.
Environmental Control Unit
Cuyahoga County Board of Health

cc: John Romano, Supervisor

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PDR ADDCK 04008724
C PDR

FAX NUMBERS: Administration (216) 443-5655 • Environmental (216) 443-7537 • Nursing & Community Health Services (216) 443-5659

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Comments of Chemetron's Final Site Remediation Plan

- *) Comments received by our office has cover page from Barry Kho and then skips to page 3. Please advise as to what pages are deleted from this portion of Chemetron response.
- 1) NRC question 9, comment 46 - during previous quarterly meetings it was discussed that materials found outside the respective sites would be treated as separate areas of contamination. These separate areas would not be allowed to be added to established Bert or Harvard sites. Has this issue been resolved?
- *) Comments received by our office is missing page 11 which appears to have response to NRC question 14 and question 15. Please advise as to what is deleted from this portion of Chemetron response.

" Other Comment Section "

- 2) Response 8 - indication is that remediation plan and support documents will be submitted to NRC by 2-28-95. Does this include response to this current set of comments. If not what is the time frame for the response.
- *) It is noted that page 24 which contains response to question 9 is omitted from our copy for review. Please advise as to what is deleted from this portion of Chemetron response.
- *) It is noted that page 26 ends with incomplete sentence. There is no page 27 with copy receive by our office. Please advise as to what is deleted from this portion of Chemetron response.

ATTACHMENT 3 - CHEMTRON H/S PLAN

Discusses use of MSA Explosive Meter Model 2A (or equivalent). What are the explosive gases of concern during remediation efforts, and what does a Model 2A detect (pg 5-4)? Also gas LEL's which are used in Table 3 are for what types of gas?

8.4 - Refresher Training

Why is CPR and First Aid training being limited to selected supervisory personnel?

ATTACHMENT 11 - BERT AVE SITE WATER LEVELS

Contained within this attachment are water levels for on site monitoring wells. Question 6 - NRC Comment 18 discusses water table levels. In your response it is stated that highest achievable level would be approximately 675 ft. msl. Within Attachment 11 it is noted that Well BW-10S only has one data entry on 12/4/92, and the level is 673.14. This well appears to be within the final cell area. Also it was noted that well BW-7S, which may not be within final cell area, has achieved levels of 691.33 on sampling date 1/8/93. What concern is there as to BW-10S only being sampled once, and levels recorded of surrounding wells which are higher than 675 ft msl.