



April 14, 1992
696-1896

Mr. John W. N. Hickey, Chief
Fuel Cycle Safety Branch
Division of Industrial and
Medical Nuclear Safety, NMSS
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: **Docket No. 70-734; License No. SNM-696; Decontamination Guidelines for GA's SVA Decommissioning Project**

- References:
- 1) Asmussen, K. E., Letter No. 696-1534 to Charles J. Haughney, "Submittal of SVA Decommissioning Plan," dated March 30, 1990.
 - 2) Asmussen, K. E., Letter No. 696-1612 to George H. Bidinger, "Submittal of Additional Information in Support of Request for SVA Decommissioning Plan Approval," dated August 24, 1990.
 - 3) Haughney, Charles J., Letter to General Atomics, ATTN: Dr. Keith E. Asmussen, License No. SNM-696 Amendment No. 16, dated November 13, 1990.
 - 4) Crow, W. T., Letter to GA Technologies Inc., ATTN: Dr. Keith E. Asmussen, dated November 26, 1985.
 - 5) Hickey, John W. N., Letter to General Atomics, ATTN: Dr. Keith E. Asmussen, License No. SNM-696 Amendment No. 18, dated March 31, 1992.

Dear Mr. Hickey:

By letter dated March 30, 1992, General Atomics (GA) submitted a plan for decommissioning its HTGR Fuel Fabrication Facility located in GA's SVA Building (Ref. 1). This plan, titled, "SVA Decommissioning Plan," was revised in response to NRC comments and resubmitted on August 24, 1990 (Ref. 2); and approved in November, 1990 (Ref. 3).

The SVA Decommissioning Plan states that the release of the facility and soil will be based upon criteria derived from a pathway analysis and that the levels so determined will take into account the technical basis presented in NUREG/CR-5512.

In recent conversations with Ms. Merri Horn of your staff and Mr. Charles E. Hooker of Region V, GA has confirmed that there are significant unresolved concerns regarding the technical content of NUREG/CR-5512, and that consequently, the NRC approved criteria for release of facilities and equipment to unrestricted use are not those stated in GA's SVA Decommissioning Plan, but rather, are those found in "Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use or Termination of Licenses for Byproduct, Source, or Special Nuclear Material" (herein referred to as "the Guidelines"). Accordingly, GA is decontaminating its SVA Facility to levels below the criteria contained in the Guidelines. Please note that the Guidelines are incorporated into GA's license by License Condition No. 25.

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Similarly, we have also been informed that the applicable NRC (and EPA) approved release criteria for soil are those of Option 1 of the NRC Policy Issue SECY 81-576. In particular, the maximum concentrations permitted under Option 1 are: 10 pCi/gm for natural thorium, 10 pCi/gm for natural uranium, 35 pCi/gm for depleted uranium, and 30 pCi/gm for enriched uranium. If a mixture exists in the soil, then the sum of the fractions will be used to demonstrate compliance.

The above described release criteria, i.e., the Guidelines and the NRC Policy issue SECY 81-576, have been previously approved by NRC for use at General Atomics (e.g., Ref. 4). And, in fact, they were recently cited as being the appropriate criteria in the NRC Safety Evaluation Report dated March 31, 1992 supporting the release of selected GA laboratories to unrestricted use (Ref. 5).

The purpose of this letter is to document GA's efforts and commitment to decontaminate its HTGR fuel fabrication facilities and equipment to levels below those given in the Guidelines and remove any associated contaminated soil until the residuals meet the NRC Policy (SECY 81-576) Option 1 criteria. Further, while GA has received oral confirmation from NRC staff that these are the appropriate approved release criteria, rather than those given in the SVA Decommissioning Plan, GA has a need for, and hereby requests, a record documenting such concurrence.

If you should have any concerns regarding the above, please contact me as soon as practical at (619) 455-2823. Likewise, if you have questions regarding the above, please contact me at your convenience. Your early attention to this request will be very much appreciated.

Very truly yours,



Keith E. Asmussen, Director
Licensing, Safety and Nuclear Compliance

KEA:shs

cc: Ms. Merri Horn, Fuel Cycle Safety Branch, NRC Headquarters
Mr. Charles (Chuck) Hooker, NRC Region V
Mr. Robert J. Pate, NRC Region V
Dr. Gerard Wong, California Department of Health Services,
Radiologic Health Branch
Mr. Hank Kocol, California Department of Health Services,
Environmental Management Branch