



Boston University
Medical Center

Radiation Protection
Office

88 East Newton Street, D-304
Boston, Massachusetts 02118-2394
617-638-7052

MS 16
Q-7

USNRC
Region I
475 Allendale Rd.
King of Prussia, PA. 19406
Attn: Keith Brown, Ph.D.

20-02215-d

Mail Control No. 1183⁶₄

November 22, 1994

Gentlemen:

We are responding to your September 8, 1994 letter requesting further information regarding incinerator ash analysis to determine whether the ash is radioactive or non-radioactive.

Because of the difficulty of analyzing weak beta emitters in ash, we have contacted an outside testing laboratory that is EPA Certified in analyzing environmental samples for radioactivity.

1. We are enclosing documentation of their methods and their various EPA certifications. Please note that part of their procedure was originally classified as proprietary but is now considered non-classified. They have released the document as uncontrolled.
2. We will not perform ash analysis for weak beta emitters using a modified EPA extraction method that we performed and reported on in our June 24, 1994 amendment request.
3. We confirm that prior to burning radionuclides which emit low energy beta particles other than H-3 or C-14, we will determine the extraction efficiency prior to burning.

Weak Beta Emitters in Ash

We may seek to perform identically this enclosed procedure at Boston University Medical Center to analyze beta emitters in ash at a later time. Alternatively we may have this procedure performed by another certified lab or use another comparable method, e.g. combustion to identify weak beta emitters in ash. We will notify you accordingly.

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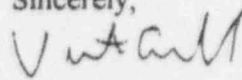
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Gamma Emitters

We would like to confirm that the MDA's for gamma emitters in incinerator ash will be $\leq 10\%$ of Appendix B, Table 2, Column 2 of 10 CFR 20.

Should you desire further information, please contact me at (617) 638-7052. Thank you.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Victor Evdokimoff', written in a cursive style.

Victor Evdokimoff
Director Radiation Protection, BUMC

enclosures