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August 26, 1996

*By E-Mail and U.S. Mail*

Jonathan M. Block, Esquire  
Main Street, P.O. Box 566  
Putney, Vermont 05346

Dear Jonathan:

This will respond to your two follow-up questions posed in your letter of August 22, 1996.

With respect to the first question (actually, two questions), Yankee objected in its formal answer, and then elected to provide some information notwithstanding—but without waiving—the objection. This follow-up information is likewise without waiver of the objection; these queries seem to us to have strayed quite a ways from the scope of the only contention admitted by the Licensing Board in LBP-96-15, as well, for that matter, from the scope of any contention ever proffered by NECNP/CAN at any time. On that basis, I'm informed as follows: The information available in the two studies, which were done more than 30 years ago, did not provide any direct measurements (e.g.,  $\mu\text{R}/\text{hour}$ ) of the background or a complete breakdown of the background radiation by isotope that could be used to determine a meaningful comparison of the background radiation between on-site and off-site locations. As indicated in the Decommissioning Plan (Section 4.2) and the FSAR (Section 307.3) Yankee will use the guidance in NUREG/CR 5849, (Draft), Manual For Conducting Radiological Surveys In Support Of License Termination, in developing the final survey plan for the Yankee Nuclear Power Station. This document contains guidance on background determination. Section 2.3.1 of NUREG/CR 5849 states "[b]ecause the background will be subtracted from total radiation or radioactivity levels to determine the net residual activity from licensed operations, it is necessary that backgrounds be determined with a detection sensitivity and accuracy at least equivalent to data from which it will be subtracted. This can be achieved by using the same instruments and techniques for background surveys as are used in assessing final site conditions." Even if the information that NECNP/CAN seeks requiring background prior to operation were available, the technology used in the pre-operational period does not meet this guidance, and therefore could not be used.

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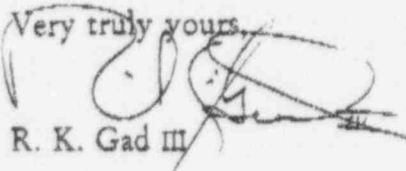
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I am informed that the answer to the second question is that the determination of the exposures of workers transporting the steam generators to Barnwell and persons involved in unloading and disposing of the material at Barnwell was the responsibility of Chem Nuclear. Apart from having reviewed the contractor's procedures for exposure monitoring during rail transport, Yankee was not involved in the issuance or processing of dosimetry and does not have access to the exposures determined. To the extent that these exposures might be considered "decommissioning" (with respect to transportation), Yankee has employed conservative estimates based on the actual surveyed dose rates of the shipments in question. The disposal facility exposures are not included in the dose estimates contained in the GEIS basis studies, and the GEIS excludes such exposures from the scope of "decommissioning" as defined in the GEIS. *E.g., id.* at 2-20 (§ 2.7), A-33.

Very truly yours,

  
R. K. Gad III

cc: All Persons on Service List