

MEMORANDUM TO: R. Blough, Chief, Projects Section 3B
THROUGH: C. Warren, Senior Resident Inspector, Pilgrim
FROM: J. Lyash, Resident Inspector, Pilgrim
SUBJECT: ALLEGATION OF IMPROPER DISPOSAL OF RADIOACTIVELY
CONTAMINATED SHRUBS (RI-87-A-0107)

Attached please find information supporting closeout of Allegation
RI-87-A-0107. This writeup reflects input provided by DRSS and will be
included in resident inspection report 50-293/87-57.

Attachment

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On August 31 and September 11, 1987 the NRC resident office at Pilgrim received allegations that radioactively contaminated shrubs had been removed from the site and improperly disposed. The alleged improper disposal occurred on July 23, August 26 and August 28, 1987. During this time period the licensee had removed a large number of shrubs from various areas of the site, including those planted near the old administration building and the switchyard. The shrubs were removed to facilitate site construction activities and to alleviate certain security concerns. Upon receipt of the first allegation on August 31, 1987 the NRC requested that the licensee perform an evaluation and provide the results for review. In addition an independent NRC review was initiated.

Resident and specialist inspectors reviewed the licensee's conclusions. The licensee evaluated material release records and interviewed personnel regarding removal of shrubs during the week of July 20, 1987. Several truckloads of shrubs that were transported offsite during the midnight shift on July 24 were examined in detail. Because trace amounts of Cobalt-60 had previously been found in soil onsite, some of the shrubs had the soil removed from the roots prior to release. Each shrub was hand surveyed before release and found to meet established offsite release criteria. They were transported first to the licensee's shorefront area and later to a dump site on licensee property. The licensee concluded that the shrubs had been adequately surveyed and that no radioactive material had been improperly released.

The resident inspectors reviewed the licensee's program for control of release of material from the site. This area was also evaluated by NRC specialist inspectors during inspection 50-293/7-19. Both inspections concluded that appropriate surveys and release limits have been established and implemented. Resident and specialist inspectors examined licensee release records for the dates in question to verify that vehicles leaving the protected area had been properly surveyed. No discrepancies were identified. NRC resident and specialist inspectors accompanied by a licensee representative collected four samples of the shrubs which had been deposited in the dump site discussed above. The samples were independently analyzed by the NRC. Three of the samples indicated no contamination. One sample indicated only trace levels of Cobalt -60. Measurements showed that the amount of CO-60 present in this sample was about 2% of the average radioactivity typically found in soil in uncontrolled areas.

The licensee's program for release of material from the site appears adequate. Appropriate survey techniques and release limits have been established. Review of records confirmed that the program is being implemented. Samples of the shrubs collected by the NRC showed zero or negligible contamination and pose no health and safety concern. Based on the above this allegation is considered closed. NRC Region I staff provided status briefings concerning the shrubs to Senator Kennedy's staff and to the Massachusetts Department of Public Health.