

PROVIDED IN SUPPORT OF VERMONT YANKEE TAC MA5950

From: "Devincentis, Jim" <Jim.Devincentis@vynpc.com>
To: "RXC2@NRC.gov" <RXC2@NRC.gov>
Date: Wed, Jun 30, 1999 10:27 AM
Subject: FW: Soil disposal on-site under 10CFR20.2002

Rick,

The following is some input from my technical folks. I'm still interested in pursuing approval to use the same methodology (implemented through our ODCM and reported as noted) if possible. If this approach is unprecedented and not acceptable we will pursue submittals on a case by case basis.

I'll call to discuss once you have some time to consider.

Jim DeVincentis

-----Original Message-----

From: msstrum@dukeengineering.com [mailto:msstrum@dukeengineering.com]
Sent: Tuesday, June 29, 1999 6:20 PM
To: Devincentis, Jim
Cc: dave.tkatch@vynpc.com; debbie.voland@vynpc.com;
psliddle@dukeengineering.com
Subject: Re: Soil disposal on-site under 10CFR20.2002

Jim;

Yes, the prior applications for septic waste and cooling tower silt did include projections of future volumes of material based on identified generation rates of septic and silt material. In the dirt application, no future generation rate was provided since the creation of any volume of contaminated soil is (at the present) a unique event that can not be tied to any on-going process that generates a fixed or predictable amount of soil each year. However, the commitment to satisfy the dose criteria is still applicable whether we generate a known or predictable volume of dirt each year, or if the volume is unpredictable. We still will use the same methods of estimating the dose impacts per acre of disposal area for what ever volume is generated and compare to the dose acceptance criteria. Once a field reaches the dose limit, no more material (septic, silt or dirt) can be spread on it.

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We are asking for dirt as a category to be added to the type of material that can be spread, with approval to add additional radioactivity to the disposal fields "if" we find contamination, just as we would if cooling tower silt were to be found contaminated each year. This is very desirable to have so that we do not have to repeat the 10CFR20.2002 application process for every discrete occasion in the future where very low level soil contamination is found

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