

file

OCT 18 1985

U. S. Ecology
ATTN: Kenneth Waller, Director
Transportation Services Division
9200 Shelbyville Road
Louisville, KY 40222

Gentlemen:

A meeting was held between Andrew J. Armbrust and Randy Jeffries of your staff and me on October 17, 1985, at the Signature Inn, I-465 and West 38th Street, Indianapolis, Indiana, to discuss information still needed to complete our review of your application for a waste storage facility and to view the proposed site at 1800 De Andra Drive, Zionsville, Indiana. The following is a list of the items discussed and any additional information you will need to submit for us to complete our review:

1. Qualifications of Individuals Responsible for Program

Your application and facility operations manual state that responsibilities for training of individuals and other duties in your on-site radiation protection program will be delegated to your Facility Manager, Assistant Facility Manager or Supervisory personnel. Please provide the training and experience for these individuals in basic radiation protection and handling of the types of materials proposed for your license. You may wish to name the minimum qualifications required for your Assistant Facility Manager or Supervisors rather than list the individuals by name. We do ask that you specify the name of your facility manager, which you did in your July 10, 1985 letter to us. However, we did not receive Mr. Jeffries qualifications with the letter.

2. Material

- a. Your application indicates that you will transfer diminimus levels of waste containing radioactive material to Quadrex in Florida (see Item 11). Please clarify whether or not these levels are referring to those specified in Section 20.306 of 10 CFR Part 20. If not, the material must be transfered to an authorized waste disposal facility.
- b. Item 1 of your July 10, 1985 letter to us states that you will not be receiving special nuclear material; however, Item 11 of the letter states that you will. Please clarify. If you will be receiving this type of material, you will need to submit a radiological contingency plan as specified in our June 11, 1985 letter.
- c. Item 2 of your July 10, 1985 letter indicates that you will not be able to operate under the constraints of 180 days for an extended period of time. If this is the case, we will not issue you a license without your performing an environmental assessment and submitting the information specified in Sections 51.45 and 51.60 of 10 CFR Part 51. Your assessment should include a discussion of

- 1). The need for the proposed activities from an industry standpoint.
- 2). The site location and evacuation problems in the event of release of material.
- 3). Accident analysis including risks, environmental impacts, and other consequences from tornados, earthquakes, major fire, explosions, etc.
- 4). Any Federal, State, or local permit requirements for operation and the status of your receiving them.

3. Facility

- a. Please describe your procedures or the precautions you will take for storing volatile or flammable waste in the warehouse area indicated in your September 30, 1985 letter. Clarify whether or not any other flammable materials will be stored in the warehouse building and whether the waste drums will be stored on the floor or wooden pallets. We recommend not storing flammable materials or using wooden pallets as discussed in our meeting. If you do decide to use pallets, please submit justification.
- b. Describe whether or not the building will be constructed of materials that easily burn (e.g., wood or steel framing, firewalls, concrete or wood floor, etc.).
- c. Describe your ventilation system as requested in our June 11, 1985 letter. Your description should include operational checks, the location of release points to the environment or areas inside the warehouse, and systems used to isolate the system during an event that could cause release of radioactive material (e.g., fire). If you do not have a ventilation system and anticipate storing flammable or volatile waste, please justify the lack of a system in terms of the flash points of this type of waste.
- d. Describe your considerations for systems where there is a potential for release of radioactive material to unrestricted areas (e.g., check valves in incoming water lines, drains to a holdup tank, methods to mitigate release of water through sewer lines or into water systems, etc.).
- e. Describe the procedures you will utilize to provide adequate spacing between storage areas for future access for removal of drums, fire fighting, etc.
- f. Section 4.3, page 19 of your Facility Operations Manual states that exposure levels surrounding the warehouse will be maintained at less than 500mR/yr. Please be advised that you must maintain these levels in accordance with Section 20.105 of 10 CFR Part 20 unless you apply for an exemption as specified in Section 20.105(a).

g. Fire protection system

- 1). Please indicate whether or not your proposed building design and fire protection system (i.e., use of the spacing and numbers of fire extinguishers) as specified in your September 30, 1985 letter will satisfy local building and fire codes and confirm that an inspection will be performed by the local Fire Chief. In addition, indicate access to water supplies.
- 2). Describe your automatic fire detection system in more detail. The description should include the type of detector (e.g., smoke, heat), the cutoff points for alarm, and operational checks.
- 3). Describe the time it will take for the local fire department to respond to a fire at your facility, and the rating the fire department has been given to qualify it for handling the type of materials that might be involved in a fire at your facility.

h. Describe the training you will provide to the local police department and operational checks for your intrusion alarm system.

4. Quality Assurance System

Your manual describes procedures you will utilize for quality control on labeling and records for packaged waste received from your clients. However, please describe any procedures you will use to ensure that drums are packaged in accordance with your instructions and disposal facility requirements. We do not ask that you open the drums.

5. Inventory Control System

Please submit a description of the procedure(s) you will use to ensure that material will not remain in the warehouse for longer than 180 days (e.g., a first-in, first-out concept).

6. Plan To Meet Consequences of Accidents

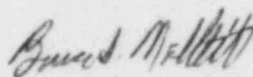
Please submit an analysis of how your facilities, location, and procedures will mitigate the consequences of events which could cause release of radioactive material to unrestricted areas (e.g., consider events such as tornado, flood, fire). Your analysis should include worst case calculations of airborne concentrations at the nearest occupied area downwind from your facility. The discussion and data presented in NUREG-0767 will aid you in the estimation of amount of your inventory that could be released or made airborne in an accident. You may reference previously submitted material or discussions.

7. Decommissioning

Please discuss your decommissioning plans in the event you choose to release the site for unrestricted use. Your discussion should include contamination limits in accordance with the enclosed guide and the provisions you will employ to ensure that you will have the funding and personnel available to carry out the decommissioning.

We will continue our review of your application upon receipt of this information. Please reply in duplicate, within 30 days, and refer to Control Number 78322.

Sincerely,



Bruce S. Mallett, Ph.D., Chief
Materials Licensing Section

Enclosure: Decontamination Guide

RIII BS-10/24/75

Adam/Mallett/bs

cc: W. Axelson
J. Strasma