UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF RESEARCH AND DEVELOPMENT
ENVIRONMENTAL RESEARCH LABORATORY
HATFIELD MARINE SCIENCE CENTER
NEWPORT, OREGON 97365

December 3, 1987

Ms. Beth A. Riedlinger
U. S. Nuclear Regulatory Commission, Region V
Nuclear Materials Safety Section
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596

OCEAN DISCHARGE DIVISION
TELEPHONE (503) 867-4040

Dear Ms. Riedlinger:

In response to your letter of October 13, 1987, the following information is submitted to satisfy your request for further information regarding:

Docket No.: 030-02428 20428
License No.: 36-23261-01
Control No.: 70633

1. Page 2, Paragraph 2 of our letter dated August 19, 1987 is eliminated and replaced as follows: Licensed materials (S-35) for disposal shall be placed into locked storage in sealed drums at the Newport site. The waste will be segregated into three types. One will be scintillation vials, one will be liquid waste, and the third will be contaminated solid waste.

   The scintillation waste will be shipped out as scintillation waste to an approved dump site. The liquid waste will be either shipped out as radioactive waste to an approved dump site or stored in drums on our site until the activity decays to levels indistinguishable from background as determined by liquid scintillation counting. The contaminated solid waste (gloves, paper, etc.) will either be shipped out as radioactive waste to an approved dump site or be stored on site until the activity decays to levels indistinguishable from background after storage for 10 half lives (2.5 years) and then disposed of to the sanitary landfill. All radiation symbols will be removed from the waste and destroyed just prior to disposal of the waste. Inventories will be maintained for the Radiation Safety Officer (RSO).

   If hazardous chemicals are present in the waste, the waste will be placed into locked storage in a sealed plastic (DOT Approved) drum at the Newport site. The waste will be stored to allow the licensed material to decay for 10 half lives (2.5 years) and then disposed of by the appropriate Newport hazardous waste protocol. All radiation symbols will be removed and destroyed just prior to disposal of the waste. Inventories will be maintained for the Radiation Safety Officer (RSO).

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2. Page 3, Paragraph 1, under Field Protocols of our letter dated August 19, 1987, is modified as follows: The sentence reading "These incubations will be done in an EPA mobile laboratory, a field station laboratory, or a shipboard laboratory." is replaced with "These incubations will be done in/on U. S. EPA, other U. S. Government, state, state university, private university, or private mobile and nonmobile laboratories and/or vessels. Written permission will be obtained from owners of non-EPA facilities prior to the start of the work."

3. We have only one thin-window survey meter at the present time but have written a purchase order for another. The one we are purchasing is another Technical Associates Model TBM-3 and will be on hand prior to the start of any field work. The serial number of the meter will be supplied to the NRC at Region V when it arrives and the meter will be calibrated yearly.

4. The stress proteins work with S-35 will generate only minimal amounts of liquid and solid waste in the field. Gloves, pipette tips, wipes and disposable pipettes will be placed into a solid waste barrel for radiation waste disposal. Liquid wastes, if any, will be collected in a plastic carboy and transported to Newport for disposal. Inventories will be logged and the Radiation Safety Officer will be informed of the amounts, etc. The wastes will be disposed of as previously indicated.

   Temporary job sites will be cleaned to nondetectable levels as measured by our Technical Associates Model TBM-3 thin-window survey meter. The job sites will also be wipe tested by the usual method.

   Simple facility decontamination will be done by scrubbing the contaminated area with a cool-water and soap solution. All cleaning solutions will be placed into the liquid waste plastic carboy. Solid cleaning materials such as sponges, etc. will be placed into the solid waste barrel. Facility decontamination will be confirmed by the use of a thin-window survey meter and also by wipe testing. Copies of the decontamination surveys will be supplied to the NRC Region V and the Radiation Safety Officer.

Sincerely,

Richard C. Swartz, Acting

D. J. Baumgartner, Director
Pacific Division

cc: Body
Randall
Schroeder
Lee
Boese