Docket 70-1257

NOV 6 1987

Mr. Terry R. Strong, Chief State of Washington, DSHS Office of Radiation Protection Mail Stop LE-13 Olympia, WA 98504

Dear Mr. Strong:

This letter is in confirmation of our phone conversation of November 5, 1987, with regard to the disposal of sewage sludge at Richland, Washington.

We understand that the City of Richland is planning to dispose of sewage sludge containing low concentrations of uranium by placing it in their landfill, and that there is now over 5000 cubic yards of sludge to dispose.

Our Region V Office has provided us results of analyses of samples of sewage sludge from the old and new treatment facilities at Richland. We have considered the analyses results and the disposal alternatives at the landfill, and we conclude that such disposal is appropriate with regard to radiological considerations for the protection of the public health and safety and of the environment, whether the disposal is by dispersing the sludge in with the other landfill materials or by burial separately.

We arrived at this conclusion by comparing with our Branch Technical Position (46 FR 52061, October 23, 1981, copy enclosed). The analyses results show that the radioactive contamination is due to operations with pure uranium enriched to 2-3% U-235, and the results range from 116 to 142 pCi/g total uranium. These results are comparable to the results from the samples taken by your Office. We consider that such material can be buried separately under Option 2 of our Branch Technical Position, or, if mixed with other soil so that the final average concentrations are lower, its disposal can conform to Option 1.

We note that the guidance in the Branch Technical Position is based on conservative evaluations of the potential pathways for exposure of the public from such disposals, and that the proposed disposal would lead to less exposure than in the evaluations for the Branch Technical Position. For example, normal landfill practice will cause the material to be covered with uncontaminated soil, preventing long-term inhalation exposure due to material resuspended from large areas which is considered in Option 1. It is also unlikely that food crops will be grown in the buried material.

8711170175 871106 CF ADOCK 07001257 C PDR In summary, we have considered the proposed disposal of the sewage sludge containing these low levels of uranium at the Richland landfill and find it to be an appropriate disposal of that material.

Original Signed by

Jerry J. Swift, Section Leader Uranium Fuel Section Fuel Cycle Safety Branch

cc: Ross Scarano, R-V

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