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Monsanto Company, BB3B
Biological Sciences Laboratory
ATTN: Mr. Charles Rodi
Senior Research Biologist
700 Chesterfield Village Parkway
St. Louis, MO 63198

Gentlemen:

In order to complete your request for authorization to compact radioactive waste it will be necessary for you to submit additional information regarding the following:

1. Since you will be compacting radioactive waste for three separate Monsanto licenses, there is a potential for large quantities and several types of radioisotopes to be compacted. Item B of your letter states that generally the trash will contain less than 1-2 mCi/ft³ of material, primarily carbon-14, hydrogen-3, sulfur-35, and iodine-125. However, you may compact other isotopes listed on the licenses. Please specify all isotopes which may be compacted as well as the maximum activity which may be compacted at any one time.
2. From the information you submitted, it does not appear that you have established any system of monitoring the effluents released into the worker's breathing zone and through the stack into the atmosphere. In order to ensure that 10 CFR Part 20, Sections 20.103 and 20.106 limits have not been exceeded some type of air sampling program should be developed. Your description should include the areas where samples will be collected, the frequency of sampling, location of the samples with respect to worker's breathing zones and airborne effluent release points, assays performed to evaluate air samples, and the methods used to relate results to actual personnel exposures, etc. We have enclosed Regulatory Guide 8.21 and direct your attention to Section 1.3, "Measurement of Radioactive Material Concentrations in Air." Please review and respond to the areas outlined under Section 1.3 of the guide.
3. Please describe your ventilation survey program in greater detail. Refer to Section 1.14 of the enclosed Regulatory Guide 8.21 for an example of the information to be submitted.
4. Please submit a copy of the emergency procedures provided to compactor operators regarding situations such as accidental spills (should liquids be compacted), waste bags that burst during compaction, and any other foreseeable compaction incident that could result in the spread of contamination.

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5. Please be advised that if the respiratory protective equipment supplied to compactor operators will be used in accordance with the provisions specified in 10 CFR Part 20, Section 20.103(b)(2), then you will need to submit the information outlined in Part 20, Section 20.103(c).

If you have any questions or require clarification on any of the information stated above, you may contact us at (312) 790-5625.

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 82655, Number 82656, and Number 82657.

Sincerely,

Patricia J. Whiston
Materials Licensing Section

Enclosure: Regulatory Guide
8.21, 10 CFR Part 20

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Mallett



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
739 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

BETWEEN: William O. Miller, Chief
License Fee Management Branch
Office of Administration

Regional License Section
Material Licensing Branch
FCMS, Office of Nuclear Material
Safety & Safeguards

LICENSE FEE TRANSMITTAL

A. REGION

1. APPLICATION ATTACHED

Applicant/Licensee: Monsanto Co. BB3B

Application Dated: 11/26/86

CONTROL NO. 82657

Control No.: _____

License No.: 24-19531-01

2. FEE ATTACHED

Amount: 0

Check No.: 0

3. COMMENTS

*Additional Information
to Control # 81350*

Signed L.O.

Date 12/10/86

B. LICENSE FEE MANAGEMENT BRANCH

1. Fee Category and Amount: 3M

FEE NOT REQUIRED

2. Correct Fee Paid. Application may be processed for:

Amendment ✓

Renewal _____

License _____

Signed M. Messer

Date 12/10/86