

From: [Ullrich, Betsy](#)
To: [Koffman, James](#)
Subject: facilities surveys
Date: Wednesday, October 27, 2021 2:23:00 PM

Mr. Koffman,

I did not see any surveys of the bunkers, process lines, or other areas where licensed materials were stored or handled in the past. These surveys are required by 40 CFR 42.(j) and (k). Although DU is a solid, we have identified contamination from solid DU in the past, at similar facilities. A radiation survey also may verify that no discrete items of DU remain.

I know that such surveys were discussed in the 2008 inspection, and perhaps at later inspections. Please note that the release criteria for DU contamination is small; the NRC screening value for DU, that meets the 10 CFR 20 Subpart E requirement that residual contamination not exceed 25 millirem in a year to anyone, is 101 dpm per 100 square-centimeters, of which not more than 10% is assumed to be removable. You may use this criteria for surveys, or you may develop your own using the NRC's DandD code (which was updated with more likely re-suspension factors) or with RESRAD. If you opt to use RESRAD codes to develop site-specific Derived Concentration Guideline Levels (DCGL) then you would need to provide the input parameters, output files, and sensitivity analyses of any variables selected for use in the code, along with the basis for the selection of each variable. DCGLs developed using RESRAD are required to be evaluated by our program office, and will take additional time.

Guidance may be found in NUREG 1757 and MARSSIM. Please note that Appendix B of NUREG-1757, Volume 2 contains B, "simple approach for Conducting Final Radiological Surveys". You might be eligible to perform surveys using the simple approach.

<https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1757/index.html>
Decommissioning Guidance

<https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1575/index.html> MARSSIM

Let me know if you have any discussions.
Betsy

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