

Post-Visit Notes and Observations
Oct. 13, 2000
Meeting and Site Tour
Mallinckrodt C-T Process, St. Louis, MO
Decommissioning Plan

The following presents some of the major issues that were discussed during the site tour of buildings and meeting held with the licensee's staff. The aspects need to be incorporated in the next version of the DP.

1. Some building designations given the DP are not consistent with current nomenclature. For example Fig. 2-2 of the DP refers to Bldg 201, while the current site map identifies it as Bldg 260.
2. Some structures shown in the DP are no longer identified in the current site map. For example Fig. 2-2 of the DP refers to Bldg 221, while the current site map no longer identifies it.
3. Some buildings depicted in the DP are not consistent with the current site map. For example Fig. 2-2 of the DP shows Bldg 235 in one configuration, while the current site map shows it with an additional wing.
4. The description of buildings slated for survey and release (e.g., Table 1-5 of the DP) is not consistent with the information presented during the site tour. For example, while the DP refers to Bldg 250, the tour indicated that only specific sections of buildings will be subject to final surveys. The DP needs to clearly identify which sections of each building will be included in the final survey. The areas of concern in each building include, among others, specific rooms, roofs, staircases, labs, floor drains, remodeled/refurbished areas, and equipment (e.g., hoods, duct work, exhaust fans, lab sinks, bench tops, crane, etc.). This aspect applies to other buildings as well, e.g., Bldg 510, 503, 501, 240, 91, and 90.
5. The DP is silent on how building slabs and foundations will be sealed after all superstructures are demolished during Phase I since slabs and foundations will be demolished during Phase II. The DP needs to clearly indicate that the radiological conditions of slabs and foundations will be described before being sealed and provide examples of the methods that will be used to seal surfaces with residual contamination until the start of Phase II remediation activities.
6. It was noted that specific areas in some buildings (e.g., Bldg 250) were used to test the MARSSIM site survey process. The licensee indicated that the survey DQOs used to conduct these surveys (about 3-4 years ago) are expected to meet the DQOs of the upcoming final surveys. Questions were raised as to the validity of using past surveys in documenting current radiological conditions. It was noted that if the raw data were processed using the DQOs of the approved DP and accompanied with confirmatory measurements would be acceptable if the configuration of the buildings/areas has not changed (i.e., remodeled or modified) since the conduct of the initial surveys and the results, collectively, meet DCGLs of the approved DP. The licensee indicated that it has drawings

showing the chronological sequence and extent of modification of the various buildings falling in this category.