



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

WASHINGTON, D.C. 20555-0001

November 8, 1999

Mr. Robert Kossak, Manager
Kiski Valley Water Pollution
Control Authority
1200 Pine Camp Road
Leechburg, PA 15656

**SUBJECT: REMEDIATION OF CONTAMINATED SLUDGE ASH LAGOON AT THE KISKI
VALLEY WATER POLLUTION CONTROL AUTHORITY TREATMENT
FACILITY**

The purpose of this letter is to provide guidance for the development of a remediation plan for the contaminated sludge ash lagoon at the Kiski Valley Water Pollution Control Authority (KWPCA) treatment plant. Over the past several years, we have investigated possible remediation strategies with you, your staff and support contractors, and staff of the Pennsylvania Department of Environmental Protection (PADEP). To support this investigation, we conducted a preliminary assessment of alternatives, conducted a radiological survey of the ash lagoon, and provided interim guidance for conducting dose assessments. KWPCA recently supplemented the radiological characterization of the lagoon by conducting additional sampling and analysis. Using the combined data, we developed a 3D geospatial model of the ash lagoon to get a better understanding of the distribution of the uranium-235 contamination. We met with you on July 27, 1999, to demonstrate and discuss this model. At that meeting, we committed to provide you with guidance for developing a remediation plan for the lagoon. This guidance is enclosed and discussed below.

Although KWPCA is not a U.S. Nuclear Regulatory Commission (NRC) licensee, the regulatory framework under which we would review and approve a remediation plan is 10 CFR Part 20, specifically Subpart E and §20.2002. For onsite remediation alternatives, we would apply the requirements of 10 CFR 20 Subpart E. For off site disposal alternatives, the requirements of 10 CFR 20.2002 would apply (for disposal at locations other than a licensed low-level waste disposal facility) and any residual contamination at the KWPCA site would have to meet the requirements of Subpart E.

To support the implementation of 10 CFR 20 Subpart E, we recently completed development of the Draft "Standard Review Plan (SRP) for the Review of Decommissioning Plans and Other Information Submitted to Support the Release of Nuclear Facilities," a copy of which is enclosed (Enclosure 1). To provide tailored guidance for the development of a remediation plan for the ash lagoon, we have also developed, "Guidance for Development of a Remediation Plan" (Enclosure 2). To date, for each of the four remediation alternatives we have discussed, this enclosure identifies those portions of the SRP which should be included in the remediation plan. This guidance is not intended to indicate an NRC preferred alternative nor is it intended to restrict your consideration of other alternatives. Should you identify additional alternatives, we

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will gladly revise the guidance to address those alternatives. To supplement this information, we have also enclosed a copy of Draft Regulatory Guide DG-4006, "Demonstrating Compliance with the Radiological Criteria for License Termination," (Enclosure 3), and NUREG-1549, "Decision Methods for Dose Assessment to Comply with Radiological Criteria for License Termination" (Enclosure 4). Both of these documents are referenced in the SRP. Guidance related to 10 CR 20.2002 is contained in NUREG-1101, "Onsite Disposal of Radioactive Waste," a copy of which has been provided by previous correspondence. Although this NUREG is titled "Onsite," the guidance is also applicable to off site disposals under §20.2002.

After you have had the opportunity to review the enclosed guidance, we suggest that we meet with you and PADEP staff to discuss this guidance in more detail. In addition, we recognize that there are unresolved issues associated with some of these alternatives and we would discuss these issues with you at the meeting and develop a plan for their resolution. Following this discussion and the resolution of outstanding issues, KWWPCA will need to select a preferred alternative and develop and submit a remediation plan to NRC, consistent with the supplied guidance.

Should you have any questions concerning this guidance, please do not hesitate to call Robert Nelson, Chief, Special Projects Section, at (301) 415-7298.

Sincerely,



Larry W. Camper, Chief
Decommissioning Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

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Enclosures:

1. Draft Standard Review Plan
2. Guidance for Development of Remediation Plan
3. Draft Reg Guide DG-4006
4. NUREG-1549

cc: KWWPCA Dist. List

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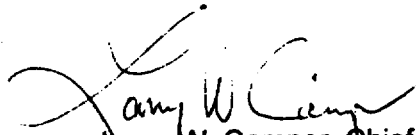
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After you have had the opportunity to review the enclosed guidance, we suggest that we meet with you and PADEP staff to discuss this guidance in more detail. In addition, we recognize that there are unresolved issues associated with some of these alternatives and we would discuss these issues with you at the meeting and develop a plan for their resolution. Following this discussion and the resolution of outstanding issues, KVVPCA will need to select a preferred alternative and develop and submit a remediation plan to NRC, consistent with the supplied guidance.

Should you have any questions concerning this guidance, please do not hesitate to call Robert Nelson, Chief, Special Projects Section, at (301) 415-7298.

Sincerely,



Larry W. Camper, Chief
Decommissioning Branch
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2. Guidance for Development of Remediation Plan
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