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October 26, 2000

Mr. Todd Jackson
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Q-9

31-02892-06

**SUBJECT: DOCUMENT REVIEW—DECOMMISSIONING PLAN FOR THE ST.
ALBANS VETERANS ADMINISTRATION EXTENDED CARE FACILITY
(DOCKET NO 30-34751, RFTA NO. 00-012)**

Dear Mr. Jackson:

The Environmental Survey and Site Assessment Program (ESSAP) of the Oak Ridge Institute for Science and Education (ORISE) has reviewed the subject document. The review was conducted in accordance with NUREG-1575. Comments are provided for your consideration.

Please direct any questions you have to me at (865) 576-5321 or Tim Vitkus at (865) 576-5073.

Sincerely,



Phyllis C. Weaver
Project Leader
Environmental Survey and
Site Assessment Program

PCW:dkh

Enclosure

cc: R. Clement, NRC/NMSS/TWFN T-7F-27
E. Knox-Davin, NRC/NMSS/TWFN/8A23
W. Beck, ORISE/ESSAP
E. Abelquist, ORISE/ESSAP
T. Vitkus, ORISE/ESSAP
File/0771

P. O. BOX 117, OAK RIDGE, TENNESSEE 37831-0117

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NMSS/RGN MATERIALS-002

**Comments on the St. Albans Veterans Administration Extended Care Facility
Decommissioning Plan (Final Status Survey Plan)
and the
Draft Version 4: Justification for Strontium 90 Soil DCGL
Queens, New York**

The document review for the St. Albans Veterans Administration Extended Care Facility (VAECC) included the review of the Final Status Survey Plan (Final Decommissioning Plan (2000) and the Draft Version 4: Justification for Strontium-90 Soil DCGL (2000).

General

1. In addition to Sr-90, H-3 and C-14 were identified in the Characterization Report as contaminants. However, neither C-14 or H-3 has been adequately addressed in the Decommissioning Plan or in the "Justification for Sr-90 soil DCGLs". Does Sr-90 serve as a surrogate or will the unity rule apply? The Decommissioning Plan provides a DCGL for H-3 but further discussion of its use is not included in the text. No DCGL is provided for C-14. Please provide additional information on the release criteria?

Final Status Surveys (Decommissioning Plan) Comments

2. Section 4.0: The purpose for the final status survey is to demonstrate that the potential dose from residual contamination is below the agreed upon release criteria, e.g., DCGLs. Is this section of the Decommissioning Plan, considered to be the final status survey plan?
3. Section 4.1: According to the decommissioning plan, all upper walls and ceilings were classified as a Class 3 survey units but upper walls and ceilings are listed in Section 4.1 as Class 1 and Class 2 areas. Please clarify the classification methods for the facility.
4. Section 4.2: Survey Units 001-004, 009 and 010 were originally classified as Class 1 survey units and 005 was originally a Class 2 in the Stone & Webster report (1998). Sufficient justification should be provided to detail reclassification of survey units 003, 005, and 009 to Class 3 survey units.
5. Section 4.2; Category 2; Page 30: The FSS plan states that the number of samples required for surface activity measurements is based on the Sign test for tritium smears (see also general comment no. 1). Please provide the input data used to determine the relative shift?
6. Section 4.2.2; paragraph 2; page 32: The plan should include a table documenting both the static measurement and scanning MDC for each instrument type used during the final status survey. Has a table of area factors been developed for elevated measurement comparisons?