



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I

475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406

OCT 25 1988

Docket No. 030-20934

License No. 37-23341-01

Commonwealth of Pennsylvania
Department of Environmental Resources
ATTN: Mr. Thomas Gerusky, Director
Bureau of Radiation Protection
Post Office Box 2063
Harrisburg, Pennsylvania 17120

Dear Mr. Gerusky:

The Department of Environmental Resources (DER) letter, dated August 22, 1988 signed by Ms. Margaret Reilly to John Kinneman of this office, requested written NRC authorization for the disposal of radioactively contaminated sludge from the Royersford, Pennsylvania Waste Water Treatment Facility by land application or landfill burial. Several policy and legal issues have been raised as a result of the Royersford situation. The policy issues are being referred to the NRC's Office of Nuclear Material Safety and Safeguards (NMSS) and the legal issues to the NRC's Office of General Counsel (OGC). Until guidance is developed for use in future applications, this letter addresses our views on this matter.

Our letter dated August 31, 1988 set forth the NRC position, with respect to the radioactivity content, on the disposal of the sludge by land application. Our letter stated that the NRC does not plan to exercise regulatory authority in this matter and that the NRC, based on a study performed by Oak Ridge Associated Universities (ORAU), does not object to land application as a method of disposal.

During the August 16, 1988 meeting that was held at the DER Regional Office at Norristown to discuss the Royersford sludge, we agreed to have ORAU prepare an evaluation of the radiological consequences of disposing of the sludge by landfill burial. ORAU is prepared to begin this study once the landfill designated to receive the sludge has been identified. Please provide us with the identity of a specific contact who can provide ORAU with details of the landfill construction so that the study can be initiated.

Enclosure

OCT 26 1988

In the absence of a completed ORAU study for landfill disposal, Pennsylvania's determination regarding projected doses to the maximally exposed individual would be acceptable to the NRC. If the Commonwealth concluded that doses from landfill disposal are less than, or comparable to, disposal by land application, NRC would not object to landfill burial.

Sincerely,


William T. Russell
Regional Administrator

cc:
Public Document Room (PDR)
Nuclear Safety Information Center (NSIC)
Commonwealth of Pennsylvania

Borough of Royersford
ATTN: Sophie Simon
300 Main Street
Royersford, Pennsylvania 19468

Interstate Nuclear Service Corporation
ATTN: Guy Wilson, Manager
Corporation Health Physics and Engineering
295 Parker Street
P.O. Box 201
Springfield, Massachusetts 01151

Commonwealth of Pennsylvania
Department of Environmental Resources
ATTN: Dr. Ivna Shanbaky
1875 New Hope Street
Norristown, Pennsylvania 19401

Commonwealth of Pennsylvania
Department of Environmental Resources
Department of Radiation Protection
ATTN: Margaret Reilly
P. O. Box 2063
Harrisburg, Pennsylvania 17120

bcc:
R. Cunningham, NMSS
G. Sjoblom, NMSS
M. Miller, RI
S. Ebnetter, RI
E. Ullrich, RI
F. Costello, RI
J. Kinneman, RI
J. Joyner, RI
Region I Docket Room (w/concurrences)