



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406

AUG. 31 1988

Docket No. 30-20934

License No. 37-23341-01

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

Gentlemen:

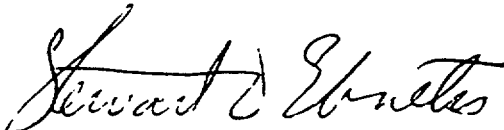
Subject: Interstate Nuclear Services Corporation and the Royersford Waste Water Treatment Facility

On August 16, 1988, J. Joyner, M. Miller, J. Kinneman and E. Ullrich of the Region I staff met with representatives of the Pennsylvania Department of Environmental Resources (DER) at the DER office in Norristown, Pennsylvania. The subject of this meeting was the contamination of Royersford Waste Water Treatment Facility (RWTF) sludge with radioactive materials discharged by the Interstate Nuclear Services Corporation (INS) laundry. As you know, INS is licensed by the NRC to launder radioactively contaminated clothing and other items at its facility in Royersford, Pennsylvania. As a result of these operations, the facility discharges water containing radioactivity into the Royersford sanitary sewer system. Over the years, processing of this wastewater resulted in the accumulation of sludge containing radioactivity at RWTF. Until recently, the sludge was spread on nearby agricultural lands as a means of disposal, reportedly in accordance with Commonwealth of Pennsylvania regulations. One of the topics discussed at the August 16 meeting was the NRC's position on the acceptability of spreading this sludge on the agricultural land.

Our inspections of the activities of INS indicate that the radioactive material released from its Royersford facility to the sanitary sewer has been, and continues to be, within the applicable NRC regulatory limits. We have already provided your office with copies of a report prepared by the NRC contractor, Oak Ridge Associated Universities, which concludes that the radiation doses resulting from the application of the RWTF sludge to agricultural land are small (less than 4 millirem per year to the maximally exposed individual). Another copy of this report and a subsequent report containing additional data and analysis are enclosed for your information. The NRC has not exercised any regulatory authority with regard to the possession and subsequent disposal of this sludge by the RWTF in the past, does not plan to exercise regulatory authority at this time, and, based on our assessment of the radiological health and safety issues associated with this manner of sludge disposal, does not object to the continued agricultural application of this material. The radiological assessment is described in the enclosed reports.

I hope this letter clarifies the NRC position with regard to the disposal of the RWTF sludge. Please contact J. Kinneman of my staff if you need further information.

Sincerely,



Stewart D. Ebnetter, Director
Division of Radiation Safety
and Safeguards

Enclosures:

1. Radiological Impacts of Effluent Releases to the Sanitary Sewer from Interstate Nuclear Service Corporation, Royersford, Pennsylvania, (Phase I) Final Report, September 1987.
2. Radiological Impacts of Effluent Releases to the Sanitary Sewer from Interstate Nuclear Service Corporation, Royersford, Pennsylvania, (Phase II) Final Report, June 1988.

cc:

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Public Document Room (PDR)
Nuclear Safety Information Center (NSIC)