



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

April 4, 2002

Docket No. 03020934

License No. 37-23341-01

Daniel R. Neeley
Plant Manager and Radiation Safety Officer
UniTech Services Group, Inc.
401 North Third Avenue
Royersford, PA 19468

SUBJECT: INSPECTION 03020934/2002001, UNITECH SERVICES GROUP, INC.,
ROYERSFORD, PENNSYLVANIA SITE

Dear Mr. Neeley:

On March 28, 2002, Betsy Ullrich of this office conducted a safety inspection at the above address of activities authorized by the above listed NRC license. The inspection was limited to a review of your program for controlling effluents released to the Borough of Royersford Wastewater Treatment Facility. The findings of the inspection were discussed with Glenn Roberts of your organization at the conclusion of the inspection.

During the inspection, we reviewed your methods for verifying that releases to the sewerage system are in compliance with NRC regulations, and your records used to track releases that are made. Based on this inspection, we understand that the daily volume of wastewater released to the sewerage system has increased since the winter, but that the increase is typical of the volumes processed in the spring and fall when your workload usually increases. We also reviewed the progress you are making towards on-site treatment of effluent liquid and direct release to the river in accordance with your National Pollutants Discharge Elimination System (NPDES) permit. We understand that you expect to have on-site treatment capability and hope to cease discharges to the Borough of Royersford Wastewater Treatment Facility during the summer of 2002. If any of our understandings are incorrect, please inform us in writing.

Within the scope of this inspection, no violations were identified.

In accordance with 10 CFR 2.790, a copy of this letter will be placed in the NRC Public Document Room and will be accessible from the NRC Web site at <http://www.nrc.gov/reading-rm.html>. No reply to this letter is required.

D. Neeley
UniTech Services Group, Inc.

2

Your cooperation with us is appreciated.

Sincerely,

Original signed by John D. Kinneman

John D. Kinneman, Chief
Nuclear Materials Safety Branch 2
Division of Nuclear Materials Safety

cc:
Dale Jakoby, RWTF
Commonwealth of Pennsylvania

D. Neeley
UniTech Services Group, Inc.

3

DOCUMENT NAME: C:\Program Files\Adobe\Acrobat 4.0\PDF
Output\137-23341-01.2002001.040420~.wpd

To receive a copy of this document, indicate in the box: "C" = Copy w/o attach/encl "E" = Copy w/ attach/encl "N" = No copy

OFFICE	DNMS/RI	N	DNMS/RI		DNMS/RI			
NAME	Eullrich/jdk for		JKinneman/jdk					
DATE	4/3/2002		4/3/2002					

OFFICIAL RECORD COPY

APPENDIX A INDUSTRIAL/ACADEMIC/RESEARCH INSPECTION RECORD (IP 87110)											
REGION I											
Insp. Report #	02-001		License #				Docket #				
Licensee Name	UniTech Services Group, Inc.										
Street Address	401 North Third Avenue										
City, State, Zip	Royersford, Pennsylvania 19468										
Location (Authorized Site) Being Inspected						same as above					
Licensee Contact Name			Dan Neeley				Phone #		610-948-9700		
Priority	2	Program Code		03218		Description		nuclear laundry			
Date of Last Inspection:			2/28/01			Date of This Inspection			3/28/02		
Type of Insp.	Announced		Special		Initial						
	Unannounced	x	Routine	x							
Next Insp. Date		March 2003		Normal	x	Reduced		Extended			
Justification for change in normal inspection frequency:			2002-001 was a limited inspection. Keep normal inspection date due to planned changes in effluent treatment and release methods.								
Summary of Findings and Actions											
No violations, Clear 591 or letter issued				x		Non-cited violations					
Violation(s), 591 issued						Violation(s), letter issued					
Follow up on previous violations:											
Inspector - Printed Name		Betsy Ullrich, Senior Health Physicist, NMSB2									
- Signature		/RA/					Date		3/23/02		
Approved - Printed Name		John D. Kinneman, Chief, NMSB2									
- Signature		/RA/					Date		4/3/2002		

PART I-LICENSE, INSPECTION, INCIDENT/EVENT, AND ENFORCEMENT HISTORY		
1.	AMENDMENTS AND PROGRAM CHANGES	
License amendments issued since last inspection, or program changes noted in the license.		
Am. No.	Date	Subject
none		

2.	INSPECTION AND ENFORCEMENT HISTORY
Unresolved issues; previous and repeat violations; Confirmatory Action Letters; and orders.	
None.	

3.	INCIDENT/EVENT HISTORY
List any incidents or events reported to NRC since the last inspection. Citing "None" indicates that regional event logs, event files, and the licensing file have no evidence of any incidents or events since the last inspection.	
None.	

PART II - INSPECTION DOCUMENTATION	
NOTE: References that correspond to each inspection documentation topic are in Inspection Procedure 87110, Appendix B, "Industrial/Academic/Research Inspection References."	

<p>The inspection documentation part is to be used by the inspector to assist with the performance of the inspection. Note that not all areas indicated in this part are required to be addressed during <u>each</u> inspection. However, for those areas <u>not covered</u> during the inspection, a notation ("Not Reviewed" or "Not Applicable") should be made in each section, where applicable.</p> <p>All areas covered during the inspection should be documented in sufficient detail to describe what activities and procedures were observed and/or demonstrated. In addition, the types of records that were reviewed and the time periods covered by those records should be noted. If the licensee demonstrated any practices at your request, describe those demonstrations. The observations and demonstrations you describe in this report, along with measurements and some records review, should substantiate your inspection findings. Attach copies of all licensee documents and records needed to support violations.</p>

1.	ORGANIZATION AND SCOPE OF PROGRAM
----	-----------------------------------

Management organizational structure; authorized locations of use, including field offices and temporary job sites; type, quantity, and frequency of material use; staff size; delegation of authority.

UniTech is a nuclear laundry which operates daily, including shift work. The typical spring increase in workload due to outages has started. Dan Neeley is the Plant Manager and RSO. Glenn Roberts is the Corporate health Physicist, employed by the parent company in Springfield, MA but his office is in the Royersford facility. Glenn is providing health physics assistance at the Royersford facility, and is working with the change from sewerage discharge to NPDES-permitted release directly to the river.

This inspection was limited to a review of the sewerage releases, and the progress made to date on release directly to the river.

2.

MANAGEMENT OVERSIGHT

Management support to radiation safety; Radiation Safety Committee (RSC); Radiation Safety Officer (RSO); program audits, including annual reviews of program and as low as is reasonably achievable (ALARA) reviews; control by authorized users.

Not inspected.

3.

FACILITIES

Facilities as described; uses; control of access; engineering controls; calibration facilities; shielding; air flow:

The licensee was completing the installation of a pipeline that runs from their facility, across Conrail property and another private property, to the river. Backhoe equipment and other heavy construction equipment were used during this process, and one excavation occurred at the chain-link fence. UniTech required, as part of the construction contract, that the chain-link fence be replaced each evening, or that the construction company post a guard at the fenceline when unattended. According to licensee representatives, the fencing was replaced each evening when the work site was shut down.

4.

EQUIPMENT AND INSTRUMENTATION

Operable and calibrated survey equipment; procedures; 10 CFR Part 21.

Not reviewed.

5.

MATERIAL USE, CONTROL, AND TRANSFER

Materials and uses authorized; security and control of licenses materials; and procedures for receipt and transfer of licensed material.

Not reviewed.

6.

AREA RADIATION SURVEYS AND CONTAMINATION CONTROL

Radiological surveys; air sampling; leak tests; inventories; handling of radioactive materials; contamination controls; records; and public doses.

The licensee's methods for verifying compliance with sewer release limits was reviewed, and it has not changed since the last inspection. On-site samples are collected for each 5,000-gallon tank prior to release to the sewer. The samples are analyzed for gross alpha and gross beta content; based on the list of radionuclides submitted by the customers whose laundry was processed and wastewater collected in that tank, the most conservative alpha limit (usually Am-241) and most conservative beta limit (typically Co-60, Cs-134 or Ce-137, and occasionally Sr-90) is used, and it is assumed that the most restrictive radionuclide is the source of all alpha or beta detected. A sum-of-ratios is also calculated. So long as neither the alpha nor beta limit is exceeded, and the sum-of-ratios calculation does not exceed 1, the tank content is released to the sewer. This is a conservative method for preventing releases in excess of the limits.

The licensee also collects a composite drip sample from each tank volume that is released. At the end of the month, the composite sample is transferred to the corporate laboratory in Springfield, Ma for gamma spectroscopy analysis to verify the actual concentrations of all radionuclides released to the sewer. Additional analysis of samples is performed quarterly to certify the concentration of "hard-to-detect" radionuclides such as Sr-90 etc. This analysis is performed by a contract laboratory. Reports of these analyses, and the total volumes released each month, are provided to the Region I office in accordance with the conditions of the license.

Records of daily releases for the period of January 2001 through March 27, 2002 were reviewed. Monthly volumes released ranged from 235,000 gallons to 1,175,000 gallons, with the highest volumes released during Feb-Mar-April-May and Sept-Oct. Daily releases ranged from 1 tank (5000 gallons) to 14 tanks (70,000 gallons) during 2001. Based on gross alpha and gross beta results, concentrations of radionuclides in the individual tanks did not exceed allowed concentrations; the sum-of-ratios ranged from 0.2 to 0.8, but were typically in the 0.4-0.6 range. Comparison of these results to the quarterly reports of isotopic analyses, the daily screening is conservative and acceptable. Isotopic analyses have lower sum-of-ratios and also do not exceed allowable limits for the specific radionuclides.

7.

TRAINING AND INSTRUCTIONS TO WORKERS

Training and retraining requirements and documentation; interviews and observations of routine work; staff knowledge of all routine activities; 10 CFR Parts 19 and 20 requirements; emergency situations; and supervision by authorized users.

Not reviewed.

8.

RADIATION PROTECTION

Radiation protection program with ALARA provisions; external and internal dosimetry; exposure evaluations; dose and survey records and reports; annual notifications to workers; bulletins and other generic communications.

Not reviewed.

9.

RADIOACTIVE WASTE MANAGEMENT

Disposal; effluent pathways and control; storage areas; transfer; packaging, control, and tracking procedures; equipment; incinerators, hoods, vents and compactors; license conditions for special disposal method.

See Section 6.

The licensee continues to progress towards on-site treatment of liquid waste, planning to release treated effluent directly to the river. Right-of-access across to private properties was established and a pipeline was installed in March 2002. The NPDES Part 1 permit was recently renewed. The licensee is finalizing the design plans for the on-site treatment system, which is required to be submitted with the Part 2 NPDES permit application. They plan to have the application submitted no later than May 2002. They expect review of the application to require 90 days, and ordering [6-8 weeks] and installation [4-6 weeks] of treatment equipment to require 10-14 weeks. They hope to perform some of this concurrent with the application review by PADEP and by DRBA (Delaware River Basin Authority). If this can be done, they could cease releases to the sewer sometime in mid-to-late summer.

10.

DECOMMISSIONING

Records relevant to decommissioning; decommissioning plan/schedule; notification requirements; cost estimates; funding methods; financial assurance; and Timeliness Rule requirements; changes in radiological conditions since decommissioning plan was submitted.

Not reviewed

11.

TRANSPORTATION

Quantities and types of licensed material shipped; packaging design requirements; shipping papers; hazardous materials (HAZMAT) communication procedures; return of sources; procedures for monitoring radiation and contamination levels of packages; HAZMAT training; and records and reports.

Not reviewed.

12.

NOTIFICATIONS AND REPORTS

Reporting and followup of theft; loss; incidents; overexposures; change in RSO; authorized user; and radiation exposure reports to individuals.

Not reviewed.

13.

POSTING AND LABELING

Notices; license documents; regulations; bulletins and generic information; posting of radiation areas; and labeling of containers of licensed material.

Not reviewed.

14.

INDEPENDENT AND CONFIRMATORY MEASUREMENTS

Areas surveyed, both restricted and unrestricted, and measurements made; comparison of data with licensee's results and regulations; and instrument type and calibration date.

Not performed.

15.

VIOLATIONS, NON-CITED VIOLATIONS (NCVs), AND OTHER SAFETY ISSUES

State requirement and how and when licensee violated the requirement. For NCVs, indicate why the violation was not cited. Attach copies of all licensee documents needed to support violations.

None.

16.

PERSONNEL CONTACTED

Identify licensee personnel contacted during the inspection (including those individuals contacted by telephone).

Use # to indicate individual present at entrance meeting.

Use * to indicate individual present at exit meeting.

Name	Title	Phone No.	In Person or By phone
*#Dan Neeley *Glenn Roberts	Plant Manager, RSO Corporate RSO	see front page	in person

17.	PERFORMANCE EVALUATION FACTORS						
A.	Lack of senior management involvement with the radiation safety program and/or RSO oversight.	Y			N	x	
B.	RSO too busy with other assignments.	Y			N	x	
C.	Insufficient staffing.	Y			N	x	
D.	RSC fails to meet or functions inadequately.	N/A	x	Y		N	
E.	Inadequate consulting services or inadequate audits conducted.	N/A		Y		N	x
REMARKS :(Consider the above assessment and/or other pertinent Performance Evaluation Factors (PEFs) with regard to the licensee's oversight of the radiation safety program)							

18.	SPECIAL CONDITIONS OR ISSUES		
NONE	x	Special license conditions	
LC 16: Reports of effluent volumes and concentrations released each quarter are provided to the RI office within 90 days of the end of each quarter as required.			

PART III - POST- INSPECTION ACTIVITIES

1.	REGIONAL FOLLOWUP ON PEFs
None.	

2.	DEBRIEF WITH REGIONAL STAFF
Post-inspection communication with supervisor, regional licensing staff, Agreement State Officer; and/or State Liaison Officer.	
Discussed with supervisor.	

TO ADVANCE TO NEXT SECTION OF FORM - PRESS **PAGE DOWN** KEY
END

