



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

June 14, 2002

Docket No. 03020934  
Control No. 131012

License No. 37-23341-01

Michael Fuller  
Manager, Health Physics and Engineering  
UniTech Services Group, Inc.  
295 Parker Street  
P. O. Box 51957  
Springfield, MA 01151

SUBJECT: UNITECH SERVICES GROUP, INC., ACCEPTANCE OF QUARTERLY  
REPORT, FOURTH QUARTER 2001, CONTROL NO. 131012

Dear Mr. Fuller:

Your letter dated February 13, 2002, provided a report of the radioactive material discharged to the sewer during the fourth quarter 2001. This report also showed the total quantities of radioactive materials released during calendar year 2001. During 2001 our monitoring identified increased radiation levels at the Royersford Wastewater Treatment Facility (RWTF). In an effort to understand the changes in radiation levels, we reviewed your reports of releases made during the period from 1997 through 2001, as well as results of analyses of samples taken from the RWTF during that time, to identify possible reasons for the increased radiation levels. Attachment 1 contains summaries of the data from this period.

The concentration of cobalt-60, and, to a lesser extent, the concentrations of other radionuclides, have increased in the RWTF secondary digester sludge over the period reviewed. The concentration of cobalt-60 in releases from your facility increased during the same period, but began somewhat sooner. The apparent lag in the increase at the RWTF may be due, in part, to the fact that the secondary digester sludge is sampled at about yearly intervals, when mechanical dewatering of accumulated sludge is required. Over the past few years, this has occurred during the fall months.

We are concerned about the increases in radiation levels at the RWTF and the apparent connection with increases in the radioactive materials released from your facility even though we acknowledge those releases comply with NRC requirements. As a result, we request that you evaluate the cause or causes of the increases in the concentration and quantity of radioactive material released from your facility. We are particularly interested in whether the increases in radioactive material released from your facility over the past 5 years are due to outside factors, such as greater amounts on the dirty laundry, or if they result from alterations or changes in the efficiency of your laundering and filtration processes. We further request that you provide us with the results of your review, so that we can determine what, if any, actions may be required to reduce the radiation levels at the RWTF.

Your cooperation is appreciated. If you have any technical questions regarding this issue, please contact Betsy Ullrich of my staff at (610) 337-5040.

M. Fuller  
UniTech Services Group, Inc.

2

Sincerely,

***Original signed by John D. Kinneman***

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

Enclosure:  
Attachment 1: Five-Year Data Summary

cc:  
Daniel R. Neeley, Plant Manager and Radiation Safety Officer  
Dale Jakoby, Superintendent  
David Allard, Director  
Ivna Shanbaky

M. Fuller  
UniTech Services Group, Inc.

3

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NAME	Eullrich/EXU		JKinneman/JDK					
DATE	6/14/2002		6/14/2002					

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Attachment 1  
Five-Year Data Summary 1997 - 2001

UNITECH SERVICES GROUP, EFFLUENT TO SEWER				
	Monthly Concentration Range (E-6 microcuries per milliliter)		Total Radioactivity Discharged (millicuries)*	Volume Discharged (gallons)
Year	Co-60	Cs-137	AORN	
1997	0.073 - 1.57	0.153 - 1.40	152	7,692,500
1998	0.255 - 1.79	0.166 - 1.34	262	9,152,000
1999	0.431 - 2.17	0.218 - 1.29	491	8,360,000
2000	0.743 - 2.76	0.270 - 0.88	492	7,880,000
2001	0.440 - 2.14	0.210 - 1.04	438	7,090,000

\* AORN = all radionuclides except H3 and C14

RWTF SECONDARY DIGESTER SLUDGE		
	Sample Concentration range E-6 microcuries per milliliter	
Year	Co-60	Cs-137
1997	26.5 - 31.5	3.0 - 3.6
1998	27.2 - 45.2	2.3 - 3.7
1999	17.0 - 42.5	1.1 - 1.8
2000	43.0 - 61.8	3.0 - 4.0
2001	54.1 - 114.9	3.0 - 4.7