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February 13, 2006

Document Control Desk
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
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SUBJECT: Responses to Request for Additional Information (RAI), Decommissioning Plan for the Ward Center for Nuclear Studies at Cornell University, TRIGA Reactor, Docket No 50-157, License R-80 and the ZPR, Docket No. 50-97, License R-89

Dear Commissioner:

Attached to this letter is Cornell's response to your additional Request for Additional Information (RAI), dated February 3, 2006, related to the Decommissioning Plan (DP) for the Ward Center for Nuclear Studies at Cornell University, Revision 1, July 2003 (DP) for Facility Operating Licenses No. R-80 and R-89 for the Cornell University Reactors, as originally submitted to your office in August, 2003.

Please review these responses and advise us of any additional information or clarification that you require.

By my signature below, I hereby affirm that I am authorized to represent Cornell University in these matters and that the statements made in response to the RAI are true and accurate to the best of my knowledge and belief.

Sincerely,

A handwritten signature in cursive script that reads "Charles R. Fay".

Charles R. Fay
Vice Provost for Research Administration
TRIGA D&D Project Director

enc: response to RAI, February 3, 2006

cc: Howard Aderhold, Director, Ward Lab of Nuclear Sciences
Stephen M. Beyers, TRIGA D&D Project Manager
Joseph A. Burns, Vice Provost for Physical Sciences and Engineering
Daniel E. Hughes, Project Manager, Office of Nuclear Reactor Regulation

A020

February 10, 2006

**Attachment A: Responses to NRC's 2-03-06 Request
for Additional Information (RAI), Cornell University
Research Reactors, Docket No. 0-157/97**

This response is in reference to the United States Nuclear Regulator Commission's (NRC's) RAI dated February 3, 2006, which requested further information regarding an RAI response prepared by Cornell University (Cornell), dated May 13, 2005. As referenced in the NRC's letter, the May 13, 2005 response proposed the following revision of Section 2.3.1.1.3.1 of the DP:

"The equipment, materials, instrumentation, and tools that are used or encountered during the decommissioning may be free released if surveyed and shown not to be radioactive or to have total or removable contamination in excess of the minimum detectable activities associated with the survey methodologies employed. Items that can not be free released will be handled using one of three methods described below;

- The items may be shipped directly for disposal as radioactive waste at a licensed facility
- The items may be shipped for processing at a licensed facility
- The items may be shipped to another licensed facility for storage or use

In each case the term 'licensed facility' refers to a facility holding the appropriate radioactive material disposal, processing, storage, or use license appropriate to the class of waste involved."

The NRC's request for further information stated:

As you have stated, the minimum detectable activity is dependent on the survey methodology employed. To ensure that the release of equipment, materials and items for unrestricted use is consistent with NRC policy, please state the guidance documents to which your survey methodologies shall conform.

To clarify Cornell's response, append the following to the end of the above revision of Section 2.3.1.1.3.1 of the DP:

"The survey methodologies employed will conform to the following guidance documents:

- Information Notice No. 88-22, "Disposal of Sludge from Onsite Sewage Treatment Facilities at Nuclear Power Stations"
- Information Notice No. 85-92, "Surveys of Wastes Before Disposal From Nuclear Reactor Facilities"
- IE Circular No. 81-07, "Control of Radioactively Contaminated Material".

-- END OF ATTACHMENT A --