



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-4005

June 21, 2006

University of Hawaii
Office of the President
ATTN: Irene K. Sakimoto
Radiation Safety Officer
2444 Dole Street
Honolulu, HI 96822

SUBJECT: ACKNOWLEDGMENT OF RECEIPT OF FINAL STATUS SURVEY REPORT

Dear Ms. Sakimoto:

By letter dated January 19, 2006, you submitted the Final Radiological Status Report for University Towers in the Queen's Building to the NRC. On June 1, 2006, Mr. Robert Evans of our staff contacted you and confirmed that you are also requesting an amendment to NRC License No. 53-00017-23, Condition 10.A, to release The Queen's Medical Center - University Towers location for unrestricted use. The NRC has initiated an administrative completeness review of the final status survey report.

During the administrative acceptance review, we identified that you conducted and documented the final status survey using out-of-date NRC guidance. By NRC letter dated July 22, 1997, the University of Hawaii was advised to use draft NUREG/CR-5849, "Manual for Conducting Radiological Surveys in Support of License Terminations," and NUREG/BR-0241, "NMSS Handbook for Decommissioning Fuel Cycle and Materials Licensees." These documents refer to 1987 release criteria entitled "Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use or Termination of Licenses for Byproduct, Source, or Special Nuclear Materials." The use of these guidance documents has been discontinued by the NRC.

Currently, the NRC reviews decommissioning reports using dose-based guidance as required by 10 CFR Part 20, Subpart E, Radiological Criteria for License Termination. The documents currently used by NRC include NUREG-1575, "Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM)," and Volumes 1-3 of NUREG-1757, "Consolidated NMSS Decommissioning Guidance."

Based on the guidance provided in NUREG-1757, Volume 1, Revision 1, your submittal has been classified as a Group 2 decommissioning project because unsealed radioactive material with half-lives greater than 120 days were used and because a license amendment was not requested to remediate the respective University Towers facility. Therefore, your submittal will be processed using the guidance provided in Chapter 9 of NUREG-1757, Volume 1.

The completeness review included a limited comparison of the survey results to the screening criteria provided in Appendix B to NUREG-1757, Volume 1, Revision 1. The final status survey results appear to be less than the screening criteria limits for hydrogen-3 and carbon-14, the

radionuclides of concern. The survey design was also compared to the basic requirements of MARSSIM. The number of survey sample points appear consistent with MARSSIM recommendations. Therefore, the NRC has elected to conduct a technical review of the final status survey report without requesting a revision to the document. However, the acceptance review does not fully reflect the technical adequacy of the information provided in the report, and we may periodically request additional information as a result of our technical review.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Should you have any questions concerning this letter, please contact Mr. Robert Evans, Senior Health Physicist, at (817) 860-8234 or the undersigned at (817) 860-8197.

Sincerely,

/RA/

Jack E. Whitten, Chief
Nuclear Materials Licensing Branch
Division of Nuclear Materials Safety

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Control No.: 470848

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SUNSI Review Completed: RJE ADAMS: ☒ Yes ☐ No Initials: RJE
☒ Publicly Available ☐ Non-Publicly Available ☐ Sensitive ☒ Non-Sensitive

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