

# UNIVERSITY *of* MISSOURI

ENVIRONMENTAL HEALTH AND SAFETY

October 25, 2010

Ms. Katie Streit  
Health Physicist  
Materials Control, ISFSI, and Decommissioning Branch  
Division of Nuclear Materials and Safety  
Region III  
U.S. Nuclear Regulatory Commission  
2443 Warrenville Road  
Lisle, Illinois 60532

**SUBJECT:** Extension Request for Submittal of Pickard Hall Decommissioning Plan

Dear Ms. Streit:

The purpose of this letter is to request that the NRC extend the due date for submittal of our proposed Decommissioning Plan (DP) for Pickard Hall from November 17, 2010 to February 17, 2011. Our original notification letter (ML093270544) "Notification of Intent to Decommission Pickard Hall (License Number 24-00512-32)" was dated Nov 17, 2009.

We are asking for this three-month extension to allow us additional time to continue working on the complex issues associated with the collection of data, development of a well thought-out DP for Pickard Hall that meets NRC decommissioning requirements and a DP which appropriately considers the building's significant cultural, academic, and historical value, while also taking into account the previous work we have completed to date.

Shortly after making our original notification, we began characterizing the building for residual radioactivity in order to define the extent and magnitude of residual radioactivity and to start planning the decommissioning process. Pickard Hall currently houses the Museum of Art and Archaeology and the Department of Art History and Archaeology, and is listed on the National Register of Historic Places. Facility operations, weather factors, and an iterative characterization approach resulted in a rather lengthy characterization process.

Characterization was performed during five separate mobilizations of our decommissioning contractor from December 2009 to June 2010. A report of characterization activities and results dated July 16, 2010 was submitted to the NRC (ML102800311). A summary of the characterization activities conducted during each of the five mobilizations is provided below:

- Indoor surface activity measurements, outdoor gamma scans, air sampling, concrete surface sampling, and surface soil sampling
- Sampling of attic materials (wood and brick) and air sampling in the attic and in basement mechanical spaces



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- Roof surveys, Global Positioning System (GPS) gamma scans, elevated surface soil removal, and steam tunnel feeder soil removal
- Surface soil samples based on GPS gamma scan results, and tunnel dose rate measurements
- Scarification and encapsulation of basement mechanical spaces (Rooms 13 and 15)

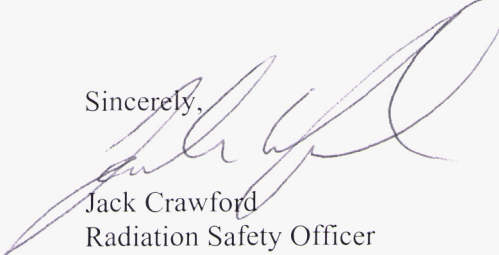
While the facility does contain residual radioactivity in some areas, these areas are being controlled under the provisions of the MU broad scope radioactive materials license. MU has sufficient staff and resources to control the residual radioactivity and prevent exceeding NRC dose limits to visitors and occupants. We are continuing to use an iterative process in our continuing evaluations of residual radioactivity in Pickard Hall and have taken several proactive steps to control radioactive materials, including

- Training and communications
- Posting and labeling
- Area security and access controls
- Operations and maintenance procedures
- Dosimetry monitoring
- Routine radiological surveys
- Encapsulation of accessible areas with removable radioactivity

The NRC inspected the facility on January 26 and 27, 2010 and performed independent verification surveys of the contractor's characterization results to date, and noted that the licensee and the NRC's survey results indicated no person or area has exceeded the public dose limits. See NRC inspection report 030-02278/10-01(DNMS), dated February 24, 2010 (ML100600810).

In summary, based upon the complexities associated with creating a DP for Pickard Hall combined with the delays already incurred due to facility operations and weather we are asking for a 3 month extension in submitting the DP to Feb 17, 2011 instead of Nov 17, 2010. We feel this request can also be supported by the significant efforts, surveys, and controls taken so far. If you have any questions or concerns please contact me at 573-882-0931, or at [crawfordw@missouri.edu](mailto:crawfordw@missouri.edu).

Sincerely,



Jack Crawford  
Radiation Safety Officer

#### Attachments

cc: J. Jones  
S. Jurisson  
P. Ashbrook  
RSO File

