

CONVERSATION RECORD

(time) (date)

TIME DATE

11/26/13

VISIT

X CONFERENCE

TELEPHONE X

F INCOMING
OUTGOING

NAME OF PERSON(S) CONTACTED OR IN CONTACT

Regis Greenwood

ORGANIZATION (OFFICE, DEPT. ETC.)

ARC

TELEPHONE NO.

314-991-4545

SUBJECT

C/N 582387 (letter dated 10/30/13): Please submit a response to the following. Each numbered item below corresponds to the numbered items in your letter.

SUMMARY

1. This is in follow-up to our discussion about your proposed revision to SOP's 29 and 41. Inspection issues were recently identified with regard to ARC's storage of surface contaminated objects (SCO) in building 200. We are also aware that building 200 is almost totally consumed with contaminated objects including objects that ARC is storing as radwaste to be disposed of, as well as objects that ARC would potentially like to decontaminate and reuse. As a result of the accumulation of these objects in building 200, ARC had begun to store SCO in other locations on ARC property (which is the subject of recent inspection findings).

Therefore, as discussed during our telephone call on 11/26/13, your request to modify SOP's 29 and 41 to allow the storage of SCO in other locations on ARC property will not be approved at this time. It is our understanding that you will **first** address the issue of disposal of SCO that ARC does not intend to use (i.e., SCO that is considered radwaste) in order to free up space in building 200. It is also our understanding that ARC will address its plans to decontaminate SCO that it intends to reuse through an amendment request that will describe safety procedures and special use facilities to facilitate the decontamination process. **Please confirm your understanding of this.**

2. We have reviewed your proposed changes to SOP-34 "Surface Soil Sampling for Site Characterization." Since ARC is not currently in the process of terminating its NRC license or releasing areas for unrestricted use (which would require meeting the 25 mrem threshold in sections 20.1402 and 1403), trigger levels for informing the NRC when soil sampling exceeds screening levels (i.e., 12 pci/gram for C-14 and 110 pci/gram for H-3 per NRC guidance for achieving the 25 mrem threshold) should be at levels that at least correlate to Part 20 limits for radiation dose limits for members of the public, or 100 mrem.

Therefore, since the screening levels that are based on the 25 mrem threshold are 12 pci/gram for C-14 and 110 pci/gram for H-3, please revise item 3.2 of SOP-34 to specify that data which exceeds 48 pci/gram for C-14 and 440 pci/gram for H-3 (a factor of 4 to reach the 100 mrem dose limit for members of the public) will be the threshold for informing the NRC. Further, please also revise item 4.1 to specify the same trigger levels for taking remedial actions, with a commitment to submit your plans for remediation for our review and approval prior to conducting remediation activities.

3. Item 3 of your letter discusses revisions to ARC's RPP that parallel ARC's proposed revisions to SOP's 29 and 41. As discussed during our telephone call on 11/26/13, since we are not authorizing the proposed modifications to SOP's 29 and 41 to allow the storage of SCO in other locations on ARC property at this time, we also cannot approve the modification to the RPP at this time. **Please confirm your understanding of this.**

4. Based on the plume rise (hr) stated in the Greenheck letter dated 8/11/11, assuming hr and wind speed (U) are constant, then

$$V_1 \times d_1 = V_2 \times d_2 \quad \text{eq.1}$$

$$\text{Vol}_1/d_1 = \text{Vol}_2/d_2 \quad \text{eq.2}$$

V1 = WB exit velocity of 3849 fpm
Vol1= WB exit volume of 21314 cfm

To keep the same hr of 44.85 ft for WB exit volume of 12000 cfm, using eq.2 the WB diameter is given as follow:

$$d2 = d1 \times \text{Vol}2 / \text{Vol}1 = 2.656 \times 12000 / 21314 = 1.49 \text{ ft.}$$

In the 6/3/13 email, you stated that the effective diameter of 3 nozzles have an effective diameter of 1.492 sq ft. Please verify that the effective diameter is 1.492 ft, not sq ft. We will accept the verification measurement of 12000 cfm as long as you provide the proof of the effective diameter of 3 nozzles.

Submit a response no later than December 10, 2013.

NAME OF PERSON DOCUMENTING CONVERSATION

SIGNATURE

DATE

Kevin Null

11/26/13

ACTION TAKEN

SIGNATURE

TITLE

DATE