

From: [Lawyer, Dennis](#)
To: [gfenton](#)
Subject: Fenton Art Glass Co., Request for Additional Information Concerning Application for a License Amendment, Control 589275
Date: Monday, May 09, 2016 9:04:00 AM

Dear Mr. Fenton,

This is in reference to your letter dated May 3, 2016, submitting your Final Status Survey Plan for Termination of Nuclear Regulatory Commission License No. SUB-491, Docket No. 04003149 In order to continue our review, we need the following additional information:

Since you are using screening levels for the derived concentration guideline level (DCGL), you are not required to have a regulatory review of the survey plan prior to implementing the plan. However, it is recommended to be reviewed to ensure that the survey will enable the release of the facility. The survey plan appears to be a procedure giving guidance to the surveyor and does not provide enough information to ensure that the survey plan will result in a survey which will allow the release of the facility. Thus most of the comments below are given to ensure our understanding of the survey method and criteria which will allow for release determination once the survey is completed. Please note that Appendix D of NUREG-1575, Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) provides a description of data quality objectives which would be helpful if directly addressed.

1. There is no discussion of site characterization, work history, site description within this survey plan. You may refer to your earlier description in the March 8, 2016, letter but since you are using a new consultant, this should be addressed. Without a site characterization, work history, and site description, survey design and locations cannot be determined to be satisfactory. Please provide site characterization, work history, and site description.
2. Step 5.3.4 states that the release of equipment and construction debris for unrestricted release shall be consistent with the limits established by Regulatory Guide 1.86. This is the guide for release of equipment and items but is not allowed for volumetrically contaminated material. If release criteria is needed for volumetrically contaminated debris material, the criteria will need to be submitted and reviewed.
3. Step 5.4.5 states to use 2 cm/sec scan rates on all instruments. Then it states that the Project CHP can vary scan rates. With this process we cannot verify that you are using appropriate calculations methods for MDC scan rates and the factors being used in this calculation. It also does not provide what level of MDC scan rate is the minimum criteria in your survey. This also does not provide use of source efficiency. Please provide MDC scan rates, the variables used in the calculation, and the minimum sensitivity that will be achieved.
4. Please provide a copy of RSP-008, "Instrumentation."
5. Step 5.8.2 states that the survey units are as assigned in Attachment 8.3. Please provide a graphical presentation of the survey grids and their points. Additionally, provide justification that these contain areas of licensed activities.

6. Based on licensing history, it was stated that a drum was stored in a field spar storage silo which contained radioactive material. Please state why this area is not included in the survey.
7. Based on licensing information submitted on March 6, 1978, the processing of material was once added in a batch mixing room. This room does not appear to be included in your survey units. Please perform a survey in this location.
8. Step 5.8.2.2 states that 18 systematic triangular grids will be used in a survey class one areas. The procedure does not justify the considerations that went into determining the number of grid locations.
9. Step 5.8.2.3 states that there is a systematic spacing on a square grid. This appears contrary to the triangular grids stated in Step 5.8.2.2. Please confirm the method of grids being used.
10. Step 5.8.2.6 states that the surveyor starts the initial stationary measurement in a random manner. What guidance is given to the surveyor to pick a random spot?
11. Step 5.8.2.6.2 states that a biased measurement may take the place of a systematic measurement. What is the basis of doing this? Where is this located in guidance?
12. Step 5.9.5 states that the surveyor must listen to alpha and beta counts. As the DCGL is in terms of alpha, the scan surveys sensitivity is normally done by section 6.7.2.2 of NUREG-1575. If the beta counts are on, please describe full detail on how scans are performed and how it can meet sensitivity criteria. Please describe or provide procedure when the surveyor obtains an alpha count.
13. Step 5.9.9 states to re-perform scan if the detection rates are not sufficiently low. Please present the minimum criteria for scan MDC rates.
14. Step 5.15 gives the survey steps for evaluating the refractory brick. The bricks' uranium content will be variable. Please describe the statistical tests what will be used to evaluate the results.
15. The survey plan does not specify how the results of the other surveys will be evaluated to state if the facility meets the release criteria or not.

We will continue our review upon receipt of this information. Please reply to my attention at the Region 1 Office (Address below) and refer to Mail Control No. 589275. If you have technical questions regarding this letter, please call me at (610) 337-5366.

Your reply must be an originally signed and dated letter. The letter may be scanned and submitted as a pdf document attached to an email; or it may be transmitted by facsimile to (610) 337-5269; or it may be sent by regular mail. If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your application OR amendment request.

Region 1 Office Mailing Address: Licensing Assistance Team, US Nuclear Regulatory

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