

DEC 23 1997

License No. 06-01450-47  
Docket No. 030-10576  
Control No. 124940

Willie J. Hagan  
Associate Vice President  
The University of Connecticut  
Department of Environmental Health & Safety  
233 Glenbrook Road, U-97  
Storrs, CT 06269-4097

Dear Mr. Hagan:

This is in reference to the application dated August 29, 1997 requesting to amend Nuclear Regulatory Commission License No. 06-01450-47. Your amendment application included requests for change in mailing address and testing of sludge from your sewage treatment plant. We have amended your license for the change in mailing address. Enclosed with this letter is the amended license.

The requests concerning testing of sludge from your sewage treatment plant require that significant additional information be submitted before they may be reviewed. In view of the length of time that has elapsed since the original submission of the amendment request (August 29, 1997), we request that your staff submit the sludge testing requests as a separate and new amendment request. We are returning those portions of the amendment request (attachments to letter dated August 29, 1997) that were not considered at this time.

As we have discussed with your staff on many occasions, because the sewer plant that receives the University of Connecticut waste is operated by the University of Connecticut, the regulation in 10 CFR 20.2001(a)(3) controls discharges from the plant and waste sludge must be assessed for the presence of radioactive material. We can consider a request to use the limits for discharge to the sanitary sewer in 10 CFR 20.2003 and thus have no requirement for sampling of the discharge from the sewer plant as an amendment to your license. Please make a clear request.

On December 22, 1997, Pamela J. Henderson and I conducted a telephone conference call with Frank LaBato, Ed Wilds and Tim Day of your staff to discuss technical and regulatory issues encompassed by the testing of sludge generated by your sewage treatment plant. In preparing your amendment request, please ensure that the following additional information is included.

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1. With regard to the existing sludge test results:
  - a. Provide a description of the test method utilized by ORISE.
  - b. Provide the uncertainty of the test results.
  - c. Provide the MDC or MDA of the system.
  - d. Specify whether instrument background and/or natural background has been subtracted from the results.
  - e. For each pCi/gm designation, specify the material that comprises the gram (biomass, carbon, sludge). Note: This applies to test results and the background measurements/standards.
  - f. Supply your calculations for background indicating how pCi/gm of carbon in biomass was determined.
2. With regard to your sludge testing program:
  - a. Provide a clear, concise description of your sewage treatment system and how it operates.
  - b. Identify the University and non-University facilities that are contributing to effluent for the sewage treatment facility.
  - c. Provide an estimate of what the percentage of the total volume of effluent to the sewage treatment facility originates from non-University sources.
  - d. Provide an estimate of what the percentage of total volume of effluent to the sewage treatment facility originates from laboratory vs. non-laboratory (residential/administrative/other) sources.
  - e. Identify the total volume throughput of the plant specified by time period (quarterly/yearly) since it began operation.
  - f. Identify the total radioactive material that is disposed via sink disposal by isotope and time period (quarterly/yearly).

Please review the enclosed document carefully and be sure that you understand and fully implement all the conditions incorporated into the amended license. If there are any errors or questions, please notify the U.S. Nuclear Regulatory Commission, Region I Office, Licensing Assistance Team, (610) 337-5093 or 5239, so that we can provide appropriate corrections and answers.

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W. J. Hagan  
University of Connecticut

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If you have any technical questions regarding this letter, please call Pamela J. Henderson at (610) 337-6952.

Thank you for your cooperation.

Sincerely,

ORIGINAL SIGNED BY:  
JOHN D. KINNEMAN

John D. Kinneman  
Division of Nuclear Materials Safety

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Enclosure:

1. Amendment No. 26
2. Attachments to the letter dated August 29, 1997

cc:

Frank J. Labato  
Edward L. Wilds, Jr.

DOCUMENT NAME: R:\WPS\MLTR\L0601450.47

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