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50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
AUTH.NAME AUTHOR AFFILIATION
UHRIG,R.E. Florida Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
EISENHUT,D.G. Division of Licensing

SUBJECT: Resquests permission to retain contaminated soil onsite. Evaluation of potential migration from contaminated soil encl.

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FLORIDA POWER & LIGHT COMPANY

April 8, 1982
L-82-135

Office of Nuclear Reactor Regulation
Attention: Mr. Darrell G. Eisenhut, Director
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Eisenhut:

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 & 50-251
Evaluation of Potential Migration
From Contaminated Soil

An additional application concerning the captioned matter is hereby submitted for approval. This request supplements our application (letter L-81-536) dated December 23, 1981. This matter has been discussed with members of your staff, and a further evaluation as well as a Class I and III fee, is forwarded.

Very truly yours,

Robert E. Uhrig

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/PLP/cab

cc: Mr. J. P. O'Reilly, Region II
Harold F. Reis, Esquire

Attachments

A001
s
1/1
w/check:
$4400.00

EVALUATION OF POTENTIAL MIGRATION FROM CONTAIMINATED SOIL

A recent radioactive liquid spill at the Turkey Point plant site, described in letter of reportable occurrence 252-82-2, dated 3/19/82, and submitted to Mr. J. P. O'Reilly of NRC, resulted in a portion of the adjacent grounds being contaminated. It is requested that approximately 2500 cubic feet of this affected earth be retained on site in the same location and under the same conditions as that approved by letter dated March 3, 1982 from Mr. S. A. Varga to Dr. R. E. Uhrig of FPL.

The total activity present in this earth is approximately 35mCi with an average concentration of approximately 465 pCi/gm-gross activity. The composition of radionuclides detected consist of: Co-58 (54%), Co-60 (38%), Cr-51 (4%), Cs-137 (1%), and all others less than 1% each (these include Mn-54, I-131, Nb-95, Co-57, Cs-134, Zr-95, Ag-110, Sb-124 and 125).

The additional retention of this earth would result in an increased volume of less than 6% and an increase in activity of approximately 15%. In 30 years this would result in an increase in activity of 2%.

In discussions with Dames and Moore (see attached supplement) this additional amount of contaminated earth retained under the same conditions as referenced above would still result in a negligible impact on both the environment and occupational and public health.

The estimated cost to excavate, package, transport and bury this contaminated earth at a federally approved disposal site is approximately $160,000. The average concentration of this radioactive material, if packaged would be less than 75% of the concentration that would require regulations for transport under Department of Transportation criteria set forth in 49 CFR 173.389 as defined "radioactive materials", and is also exempt from the requirements of 10 CFR 71.7. This would also result in inefficient use of limited available burial space.

For the above stated reasons, we request to retain this contaminated earth on-site under the criteria stated above. The impact on both the environment and occupational and public health would be negligible.

Dames & Moore
350 West Camino Gardens Boulevard
Plaza 6 / Suite 201
Boca Raton, Florida 33432
(305) 392-9070
TWX: 510-953-7529

March 30, 1982

Florida Power & Light Company
Post Office Box 529100
Miami, Florida 33152

Attention: Dr. Robert E. Uhrig - Vice President
Advanced Systems and Technology

Gentlemen:

We understand that FPL is considering placing approximately 2500 cubic feet of contaminated soil at the same location as described in our report "Evaluation of Potential Migration from Contaminated Soil," dated July 28, 1981 (Job Number 4598-127-26). (This report was submitted to the NRC along with letter L-81-536 of December 23, 1981.) We also understand that the soil is contaminated with radionuclides with a total gross activity of approximately 0.035 Curies.

Based on these understandings and discussions with the Nuclear Energy Department staff, we have assessed the impacts of permanent retention of the contaminated soils on site. Since the total gross activity is less than the activity within the existing contaminated soil at the retention site, and since the volume of contaminated soil to be added is only approximately six percent of the volume of existing contaminated soil, the addition of this contaminated soil to the retention area should not result in any significant change in subsurface hydraulics or contaminant movement. This additional soil does not change our overall assessment as presented in our July 28, 1981 report. If the soil is retained under the same criteria described in a letter from Mr. S. A. Varga to your office, dated March 3, 1982, the retention of the additional contaminated soil should not pose a significant water quality impact.

We appreciate the opportunity to review this situation for FPL. If you have any questions, please call.

Yours very truly,

DAMES & MOORE

Mark R. Stephens

Mark R. Stephens
Senior Hydrogeologist

MRS:jl/L3