



Industrial Gases

Division of Airco, Inc.

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May 28, 1985

U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pa. 19406

Attention: Mr. John Kinneman, Chief
Nuclear Materials Safety Section A
Division of Radiation Safety and Safeguards

Dear Mr. Kinneman:

In response to your letter and Notice of Violation dated May 14, 1985, Docket No. 030-05272, we propose the following:

- 1). The concentration of H-3 specified in 10 CFR, Part 20, Appendix B, Table II will be used to calculate the dilution required prior to the discharge of waste water from the hold-up tanks.
- 2). Enough diluent water will be added to the sanitary sewer at the time of discharge to achieve the levels specified in Appendix B, Table II each time waste water is discharged.
- 3). The diluent water from a metered source will be added via a separate conduit/hose at the point where waste water is discharged into the sanitary sewer.
- 4). Records will reflect the following:
 - a. The concentration of H-3 in waste water hold-up tanks expressed as μ Ci/ml.
 - b. Total volume of waste water in hold-up tanks expressed as liters.
 - c. The total activity of H-3 in hold-up tanks expressed as μ Ci.
 - d. The volume of dilution water added to the sanitary sewer expressed as liters.

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King of Prussia, Pa.

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- e. The total volume of effluent discharged to sanitary sewer (volume of waste water plus volume of dilution water) expressed as liters.
- f. Average concentration of H-3 in effluent after dilution expressed as $\mu\text{Ci/ml}$.

With respect to the average annual concentration of H-3 in effluent water, a system will now be employed in which the total amount of H-3 discharged to the sanitary sewer will be averaged over the total quantity of water discharged into the sanitary sewer. The averaging will be done for periods of one (1) month in duration. When twelve (12), one (1) month intervals have accumulated, the total quantity of H-3 discharged to the sanitary sewer for the twelve (12) month period will be averaged over the total quantity of water discharged to the sanitary sewer for the twelve (12) month period. This will be our average annual concentration of H-3 in effluent water.

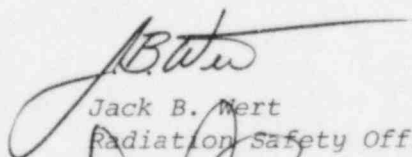
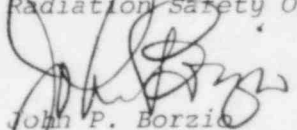
After twelve (12) months, as the quantities of each new month are added to the twelve (12) month totals, the quantities of the oldest or least recent month will be subtracted from the twelve (12) month totals.

As a result of the aforementioned system, records reflecting the average annual concentration of H-3 in effluent water will be achieved. Also, the H-3 concentration will be averaged over a running year.

These procedures will become effective the next time waste water is to be discharged to the sanitary sewer. Full compliance is expected to be achieved twelve (12) months, thereafter.

Sincerely,

AIRCO INDUSTRIAL GASES


Jack B. Wertz
Radiation Safety Officer

John P. Borzio
Operations Manager

JBW/jh