

August 27, 1996

Mr. Sean T. Norris
Project Manager
Norris Environmental
3105 F1/2 Road
Grand Junction, Colorado 81504

SUBJECT: REVIEW OF THE CLOSURE PLAN FOR THE ELKEM METALS BUILDING 78 SDMP
SITE AT ELKEM METALS COMPANY, MARIETTA, OHIO

Dear Mr. Norris:

In response to your March 15, 1996, submittal entitled, "Closure Plan for the Elkem Metals Building 78 SDMP Site," we have completed our review. The Closure Plan, including the responses to U.S. Nuclear Regulatory Commission staff comments, satisfies most of the previous staff comments. These comments were discuss with you via teleconference on August 27, 1996. The objective of the enclosed comments is to ensure that the staff concerns about the final survey effort are addressed.

Please coordinate future survey efforts with me (301-415-6702) or Donna Moser (301-415-6753).

Sincerely,

[ORIGINAL SIGNED BY:]

Clayton L. Pittiglio, Project Manager
Low-Level Waste and
Decommissioning Projects Branch
Division of Nuclear Material Safety
and Safeguards

Enclosure: "U.S. NRC's Comments on the Closure Plan for the Elkem Metals Building 78 SDMP Site"

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

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Please coordinate future survey efforts with me (301-415-6702) or Donna Moser (301-415-6753).

Sincerely,

A handwritten signature in cursive script, reading "Clayton L. Pittiglio", is written over the typed name.

Clayton L. Pittiglio, Project Manager
Low-Level Waste and
Decommissioning Projects Branch
Division of Nuclear Material Safety
and Safeguards

Enclosure: "U.S. NRC's Comments on the Closure Plan for the Elkem Metals Building 78 SDMP Site"

U.S. NUCLEAR REGULATORY COMMISSION'S COMMENTS
ON THE CLOSURE PLAN FOR THE ELKEM METALS BUILDING 78 SDMP SITE

GENERAL COMMENTS

- 1.0 How were background values determined, particularly for the roof and structural surface areas? Why do the data tables in the Appendix of the Final Status report show multiple background values? It is unclear why the beta backgrounds range from approximately 200 cpm to over 1110 cpm.
- 2.0 Please illustrate the data conversion process for all survey data. Attempts to recalculate, for example, the beta high dpm/100 cm² from the beta maximum cpm have not resulted in values equivalent to those reported in the Final Status Report.

SPECIFIC COMMENTS

Building Floor

- 3.0 Page 11, Section 4.2, "Building Floor": The verification survey to be conducted on grid Q12 after remediation should include scan surveys of the area surrounding the Q12 grid area to ensure against cross-contamination.

Primary Roof

- 4.0 Page 12, Section 4.4, "Primary Roof": Surface scans and total and removable measurements, as described in NUREG/CR-5849 for unaffected structural areas, should be conducted for those areas of the roof classified as unaffected. As discussed during the teleconference on August 27, 1996, previous characterization data does not adequately serve as final survey data for the unaffected areas of the roof.
- 5.0 Page 12, Section 4.4, "Primary Roof": The computer dose modeling code RESRAD 5.61 does not evaluate dose exposures from building/roof scenarios. Please provide the assumptions to be used in the dose assessment, if intended to be used.

Open Land

- 6.0 Page 15, Section 4.6, "Open Land": Please provide correlation data that illustrates the relation between contact instrument estimates of soil concentration and the analytical results of soil samples for actual soil concentration.
- 7.0 Page 16, Section 4.6, "Open Land": Survey units, not grid units, should be statistically evaluated to demonstrate that the activity within a survey unit satisfies the 95% confidence level. The activity of each individual measurement should be evaluated to ensure that the averaging criteria in NUREG/CR-5849 are satisfied. Please provide procedures for demonstrating that averaging criteria are met.

- 8.0 Page 15, Section 4.6 through 4.8: Will surface scans be conducted of the affected and unaffected outdoor areas and of the quonset buildings? Affected outdoor areas should receive 100% surface scans and unaffected areas should receive a minimum of 10% surface scans.
- 9.0 Page 18, Section 4.9, "Concrete Pad": It is our understanding of the Closure Plan that initial survey efforts to be conducted on the concrete pad constitute characterization data and that results of the concrete pad characterization will be submitted to NRC for review under separate cover along with a final survey plan for the release of the concrete pad.

Additional Comments on the Final Status Report

- 10.0 Page 2-5, Section 2.2.1.3, "Building 78 Floor and Concrete Structures": Was the potential for migration of contamination to subfloors investigated?