

September 12, 1996

Mr. Francisco L. (Linn) Lisbona III
Radiation Safety Officer
Alliant Techsystems
Building 502
Twin Cities Arsenal
New Brighton, MN 55112

SUBJECT: RESPONSE TO NRC COMMENTS ON REMEDIATION AND SITE SAFETY PLAN

We received a letter dated September 5, 1996, from Stan A. Huber Consultants, Inc. (SAHCI), regarding the remediation of sand at the Joliet Army Arsenal in Wilmington, Illinois. The letter responded to the concerns we had raised in our letter of September 3, 1996, that had discussed our review of their Remediation and Site Safety Plan.

On September 6, 1996, Mr. William Snell of my staff discussed SAHCI's September 5 letter with you and Mr. John Gunnick of SAHCI in separate telephone calls. Below is a summarization of those calls. It is our understanding that Item 2 was to be addressed prior to the start of work, and that Item 3 and 4 will be addressed prior to the shipment of any of the bags of sand. We are requesting that you provide us a written response to our concerns identified in Item 3 and 4.

- 1) We approved the Plan such that work could begin on Monday, September 9, 1996.
- 2) Because of the non-homogeneous nature of the DU/sand, periodic grab air samples may not be representative of what workers could be breathing or ingesting. Therefore, representative continuous air sampling would be better to determine air concentrations.
- 3) The stated MDA for the two-minute sample count being performed was only 13.1 pCi/g versus the remediation criteria of 15 pCi/g. The MDA should be 10-25% of the criteria.
- 4) It is our understanding the activity present in the bags will be determined by sampling based on two grab samples off the top of the bag, and on surface scanning the top of the sand and the outside surfaces of the bag. We do not believe this will adequately characterize the activity in the bag.

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Francisco L. Linn (Lisbona) III

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If you have any questions regarding this letter, please contact me at (630) 829-9871.

Sincerely,

Original Signed by

J. W. McCormick-Barger, Chief
Decommissioning Branch

License No.: SUB-1430 (Terminated)
Docket No.: 040-8830 (Terminated)

cc: J. Marsicek, SAHCI
M. Weber (NMSS)
C. Pederson, RIII

bcc: PUBLIC (IE07)

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