



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

October 4, 1996

Mr. William Kirk  
Bureau of Radiation Protection  
Department of Environmental Protection  
P.O. Box 8469  
Harrisburg, PA 17120-8469

Dear Mr. Kirk:

On May 16, 1996, the Nuclear Regulatory Commission staff met with staff of the Pennsylvania Department of Environmental Protection to discuss the regulatory options for final disposition of sludge ash currently stored in an ash lagoon operated by the Kiski Valley Water Pollution Control Authority (KVVWPCA). The enclosed letter documents the results of that meeting. Mr. W. Pounds, Chief, Municipal Waste Division, Bureau of Land Recycling and Waste Management, agreed at this meeting to send site-specific information on municipal landfills in the Pennsylvania area to the NRC before the next scheduled meeting of this group, as documented in the meeting report. The purpose of this letter is to clarify our information needs to facilitate its collection and completion of our analyses.

As discussed at the meeting, we plan to prepare a more realistic appraisal of potential exposures to workers and members of the public associated with disposal of the sludge ash in a local landfill. For this purpose, we request the following data from you for each local landfill that might be a potential site for burial of the sludge ash:

1. The name and location of the landfill and its distance from the KVVWPCA site (necessary to analyze the exposures due to the transportation of the waste);
2. The annual volume of solid waste that would be disposed of in the landfill, how it would be arranged in the landfill, and the physical dimensions of the landfill (necessary to estimate dilution of the radwaste and its radiological impacts);
3. The distance from the bottom of the landfill to the water table, if known (necessary to estimate how quickly the uranium could be released from the landfill into the local groundwater); and
4. The annual precipitation at the landfill site (to estimate infiltration).

Your comments on our preliminary dose calculations, which we have made available to you, are also solicited.

We will address your comments and refine our estimates of exposure for the landfill option when we receive the above information. We estimate that we can complete our analyses within two weeks of receipt of this information.

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W. Kirk

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In addition, we request a copy of Act 2, the Pennsylvania Land Recycling Act of 1995, and your appraisal of its potential impact on options under consideration for KVVPCA sludge ash disposal.

After we receive the information and complete our analyses, we will consult with you to schedule a meeting to review our dose assessments and continue our discussions about the final disposition of the contaminated sludge ash.

Sincerely,

[Original signed by]

Michael F. Weber, Chief  
Low-Level Waste and Decommissioning  
Projects Branch  
Division of Waste Management  
Office of Nuclear Material Safety  
and Safeguards

Enclosure: As stated

TICKET: LLDP-126 ✓

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| DATE | 9/30/96   | 10/4/96 | 10/7/96 | 10/4/96 |  |  |  |  |  |  |

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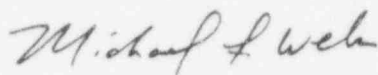
W. Kirk

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In addition, we request a copy of Act 2, the Pennsylvania Land Recycling Act of 1995, and your appraisal of its potential impact on options under consideration for KVVPCA sludge ash disposal.

After we receive the information and complete our analyses, we will consult with you to schedule a meeting to review our dose assessments and continue our discussions about the final disposition of the contaminated sludge ash.

Sincerely,

A handwritten signature in cursive script, reading "Michael F. Weber".

Michael F. Weber, Chief  
Low-Level Waste and Decommissioning  
Projects Branch  
Division of Waste Management  
Office of Nuclear Material Safety  
and Safeguards

Enclosure: As stated



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I  
475 ALLENDALE ROAD  
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

June 7, 1996

Mr. William P. Kirk  
Bureau of Radiation Protection  
Department of Environmental Resources  
Post Office Box 8469  
Harrisburg, Pennsylvania 17120-8469

Dear Mr. Kirk:

On May 16, 1996, NRC and the PADEP held our second meeting to discuss regulatory options for final disposition of the sludge ash, contaminated with low levels of uranium, at the Kiski Valley Water Pollution Control Authority facility. Much of our discussion pertained to the information we have gathered as a result of the follow-up tasks from our first meeting. The enclosures to this letter provide details.

We believe that our meeting was productive and look forward to meeting with you again in August 1996. If you have any questions, please feel free to contact me at (610) 337-5246.

Sincerely,

*David J. Chawaga*  
David J. Chawaga  
Regional State Liaison Officer

Enclosures:

- 1) Meeting Agenda
- 2) Attendance List
- 3) Summary and Follow-up Commitments

cc w/encls:

Mr. William P. Dornsife, Pennsylvania Department of Environmental Protection  
Mr. James P. Snyder, Director, Bureau of Waste Management, PADEP  
Mr. James Yusko, Regional Manager, Field Operations-Rad. Protection,  
PADEP, Southwest Region (for Charles Duritsa)

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ENCLOSURE 1

AGENDA  
for  
NRC and PADEP  
Meeting to Discuss the  
Kiski Valley Water Pollution Control Authority  
Sewer Sludge Ash

Penn State Extension Building  
234 North Third Street  
Harrisburg, PA

Thursday, May 16, 1996  
10:00 a.m. - 3:00 pm

- |   |           |
|---|-----------|
| 10:00 Opening and Introductions   | PADEP/NRC |
| 10:10 Overview of Current Status  | NRC/PADEP |
| 10:20 Begin Discussion on Results of recent NRC and DEP efforts including:  |           |
| Assessment of radiation and transportation risks for disposal options.<br>This includes public dose from burial options, occupation dose from<br>current ash and from transportation of lagoon ash, and radiological and<br>non-radiological transportation risk. (NRC) |           |
| Beneficial use options. (PADEP)   |           |
| 12:00 Break for Lunch   |           |
| 1:00 Discussion regarding Department of Energy to evaluate potential sources<br>of funding. (PADEP)   |           |
| Permitting/licensing considerations. (PADEP/NRC)  |           |
| Liability issues. (DEP/NRC)   |           |
| 2:00 Re-evaluation of options/Discussion of Future Actions NRC/PADEP  |           |
| 3:00 Meeting Adjourned  |           |

ENCLOSURE 2

List of Attendees

NRC - Region I

Todd Jackson, Health Physicist, Decommissioning and Laboratory Branch  
David Chawaga, State Liaison Officer, Office of the Regional Administrator

NRC - Headquarters

Mike Weber, Acting Deputy Director, Division of Waste Management  
Bob Nelson, Chief, Low Level Waste & Decommissioning Projects Branch  
Heather Astwood, Project Manager, LLDP  
Donna Moser, Health Physicist, LLDP

Pennsylvania Department of Environmental Protection - Harrisburg Office

Gail Jackson, for Terry Fabian, Dep. Sec for Field Operations  
Bill Dornsife, Director, Bureau of Radiation Protection  
Bill Kirk, Acting Chief, Environmental Radiation Division, BRP  
Gail Phelps, Office of Chief Counsel  
Bill Pounds, Chief, Municipal Waste Div., Bureau of Land Recycling  
and Waste Management, LRWM

Pennsylvania Department of Environmental Protection - South West Regional Office

Michael Forbeck - LRWM  
Manny Miller - LRWM  
Jody Rosenberg - Office of Regional Counsel  
John Winston - Health Physicist

ENCLOSURE 3

**Summary of Actions Currently Needed to Progress Toward Resolution  
and Responsible Organization**

- Explore Act 2, the Land Recycling Act of 1995, of Pennsylvania State Law and its potential impact on options under consideration for Kiski Valley Water Pollution Control Authority sludge ash disposal. Provide results to NRC via letter. (DEP)
- Provide letter to NRC with realistic assumptions on physical parameters relating to landfills. (DEP)
- Adjust assumptions in dose calculations to better reflect actual parameters for landfills. The result desired is a more realistic assessment of actual public health and environmental risk. NRC to recalculate dose assessment results given new parameters. (NRC)
- Meeting attendees and air quality specialists to review NRC preliminary dose calculations and associated material. Recommend changes as appropriate. (DEP)
- Perform dose calculation for beneficial use option which uses the material as "grout" to the reduce probability of potential subsidence problems. (NRC)
- Suspend efforts relating to pilot plant processing as a result of initial discussions which indicated that this option is not currently viable. (DEP)



W. Kirk

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In addition, please send us a copy of Act 2, the Pennsylvania Land Recycling Act of 1995, and your appraisal of its potential impact on options under consideration for KVVPCA sludge ash disposal, as discussed at the meeting.

Finally, please advise us when you would like to meet again to review our dose assessments and continue our discussions about the final disposition of the contaminated sludge ash.

Sincerely,

[Original signed by]

Michael F. Weber, Chief  
Low-Level Waste and Decommissioning  
Projects Branch  
Division of Waste Management  
Office of Nuclear Material Safety  
and Safeguards

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| OFC  | LLDP     | E      | LLDP   | LLDP |  |  |  |  |  |  |  |  |  |
| NAME | RNeel/cv | RNeel  | MWeber |      |  |  |  |  |  |  |  |  |  |
| DATE | 10/1/96  | 1/1/96 | 1/1/96 |      |  |  |  |  |  |  |  |  |  |

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