



# Northeast Ohio Regional Sewer District

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October 4, 1996

Mr. John Madera  
U. S. Nuclear Regulatory Commission  
Region III  
901 Warrenville Road  
Lisle, Illinois 60532-4351

Re: Proposed Discharge of Advanced Medical Systems, Inc. Tanks 173

Dear Mr. Madera:

Attached please find test data that demonstrates that Tank 173 at Advanced Medical Systems, Inc. contains detectable components of insoluble Cobalt-60. The insolubility determination was made according to NRC-approved test methods following good sample collection, chain-of-custody and laboratory practices. As you know, the relevant regulation, 10 CFR 20.2003, indicates that only radioactive material which is shown to be readily soluble in water or is readily dispersible biological material may be discharged. Therefore, a discharge of Tank 173 would be a violation of 10 CFR 20.2003. The NRC should therefore prohibit its discharge.

In the event that the NRC chooses not to prohibit these discharge, please give the District adequate time to pursue other avenues. Please note once again that *post facto* notification provided by NRC with respect to its determinations on its testing is inadequate notice.

Very truly yours,

Lawrence K. English  
Assistant General Counsel

cc: Richard N. Connelly

RECEIVED

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REGION III

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ADock 30 dkt

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Pm: 10-4-96

# OUTREACH LABORATORY

ANALYTICAL REPORT

PROJECT NO: 980576  
 CLIENT: N.E.O.R.S.D.  
 DATE SUBMITTED: 2-Oct-96  
 DATE REPORTED: 4-Oct-96

Sample ID	Date	Matrix	MDA pCi/l	Cobalt-60 pCi/l
LRW-6275-277 SOLUBLE	10/1/96	Water	2.8	BDL
LRW-6275-277 INSOLUBLE	10/1/96	Solid	2.6	BDL
LRW-6275-278 SOLUBLE	10/1/96	Water	3.1	BDL
LRW-6275-278 INSOLUBLE	10/1/96	Solid	2.1	BDL
LRW-6275-279 SOLUBLE	10/1/96	Water	2.9	BDL
LRW-6275-279 INSOLUBLE	10/1/96	Solid	2.8	3.4 +/- 1.6
LRW-6275-280 SOLUBLE	10/1/96	Water	5.9	BDL
LRW-6275-280 INSOLUBLE	10/1/96	Solid	5.4	BDL

TANK 173

Post-It® Fax Note	7671	Date	10-4	# of pages	2
To	LENGUISH	From	KASBERG		
Co./Dept.	LEGAL	Co.	WDIS		
Phone #		Phone #	641-6000 X-245		
Fax #	881-4407	Fax #	641-8118		

MDA = Minimum Detectable Activity

BDL = Below Detection Limit

P. 02  
PAGE 03

Page 1 of 1

MULTIREACH LABORATORY

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