



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

August 22, 1995

MEMORANDUM TO: Dennis K. Rathbun, Director  
Office of Congressional Affairs

THRU: Hugh L. Thompson, Jr. *Hugh L. Thompson*  
Deputy Executive Director for  
Nuclear Materials, Safety, Safeguards  
and Operations Support

FROM: Carl J. Paperiello, Director  
Office of Nuclear Materials, Safety, Safeguards  
and Safeguards *Carl J. Paperiello*

SUBJECT: BRIEF STATUS OF ADVANCED MEDICAL SYSTEMS, INC.

Attached is a brief status of the situation of Advanced Medical Systems, Inc., that has been generated to address Senator John Glenn's inquiry on the subject.

Attachment: As stated

CONTACT: Cynthia Jones, NMSS  
(301) 415-7853

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BRIEF STATUS OF ADVANCED MEDICAL SYSTEMS, INC.  
August 14, 1995

1. WATER PROCESSING AND SITE REMEDIATION ACTIVITIES

As a result of a Federal District Court judgment against Advanced Medical Systems, Inc. (AMS), a temporary restraining order was issued to prevent AMS from discharging waste water into the Northeast Ohio Regional Sewer District (NEORS) sewage collection and treatment system.

On November 15, 1994, NEORS installed plugs in the AMS connections to the sewage system. This resulted in increased water levels in the soil around the facility and, by mid-January 1995, ground-water intrusion into the basement of the facility. The water in the basement became radioactively contaminated from facility surface contamination.

In April 1995, AMS began processing (cleaning) the water in the basement and the AMS manhole. Nearly 100,000 gallons of water were processed until the basement was clear of water, on June 23, 1995. The processed water is currently stored in 25,000-gallon storage bladders inside the AMS facility. The U.S. Nuclear Regulatory Commission (NRC) as well as the Environmental Protection Agency recently authorized AMS to dispose of the water by evaporation.

On July 3, 1995, excavation and immobilization projects began. A new manhole on AMS' property was installed, and the old AMS manhole and lateral connector to the NEORS sewer lines were grouted. Extensive contamination was found throughout the underdrain system, which necessitated the removal of most of the old system and the installation of a new system. The new system will not be connected to the NEORS sewer lines until both the NEORS and NRC grant permission. Until then, AMS will pump rain and ground water out of the new underdrain system and manhole into outdoor storage tanks, where the water will be analyzed for Co-60, and then processed, if necessary.

2. AMS LICENSE RENEWAL

The AMS license expired on December 31, 1994. On November 29, 1994, AMS submitted its application for renewal. This application was revised and resubmitted on January 26, 1995. It consisted of four parts: (1) application for materials license, (2) emergency plan, (3) decommissioning funding plan, and (4) financial assurance. NRC has reviewed and sent deficiency letters to AMS for each part of the application. Although NRC has received responses from AMS, several issues still need clarification and remain outstanding. On March 13, 1995, NEORS and the City of Cleveland were granted their request for a hearing regarding the sufficiency of the license renewal application; this hearing is conducted under the 10 CFR Part 2, Subpart L, "Informal Hearing Procedures for Adjudications in Material and Operator Licensing Proceedings."

### 3. COMPLETION OF PHYSICAL INVENTORY

License Condition No. 14 of the AMS license requires AMS to have conducted a physical inventory by June 1, 1993, and thereafter to conduct such an inventory every 60 months.

On March 30, 1993, AMS had completed all aspects of the required physical inventory except for the contents of the front storage well in the hot cell. The floor plug covering this storage well could not be removed; thus the sources within the cell could not be inventoried.

AMS made several attempts to remove the stuck floor plug, in 1993 and in 1994, but was unsuccessful. It plans to mill out the plug sometime in the next few months. An outside contractor has already been chosen for the project, and all the necessary equipment has been fabricated.

### 4. COMPLETION OF EMERGENCY EXERCISE

License Condition No. 18 of the AMS license requires AMS to conduct an emergency exercise every 2 years. During an NRC inspection conducted at AMS in October 1994, NRC inspectors discovered that AMS had failed to conduct an emergency exercise.

By letter dated December 29, 1994, AMS indicated that a full-scale exercise with offsite emergency personnel would be scheduled by February 28, 1995, and conducted by August 31, 1995. Since then, AMS has submitted a revised emergency plan as part of its license renewal application. This new plan is currently being revised, because of extensive input from NRC and local offsite response organizations. AMS has not scheduled the exercise because of the extensive revision of the submitted emergency plan and the other safety related issues at the facility requiring its immediate attention.

### 5. REDUCTION OF LICENSED MATERIAL

According to AMS, approximately 22,000 curies of unsealed- and 48,000 curies of sealed-source solid metal cobalt-60 are stored at the facility. Since AMS is no longer manufacturing sealed sources and has no plans to make use of the sealed sources, AMS has indicated that this material is not necessary for its operations. AMS has also stated that the material will eventually be transferred offsite.

AMS has also stated that approximately 11 curies of cobalt-60 reside in various rooms in the facility as uncharacterized surface contamination. In addition, approximately 29 curies of packaged, solid cobalt-60 waste reside in the high-level waste storage room, and in boxes and drums in the basement. The surface contamination and waste have been accumulating over many years. AMS has indicated that the contaminated areas will eventually be decontaminated, and the waste will be transferred offsite.

In addition, AMS has indicated that approximately 40 curies of unpackaged

cobalt-60 waste are contained in the Waste Hold-Up Tank room. This room is no longer used and was made inaccessible to workers in the late 1980s. AMS has indicated that this room will eventually be decontaminated, and the waste will be transferred offsite.

#### 6. OHIO STATE EMERGENCY RESPONSE COMMISSION (SERC)

On June 16, 1995, the SERC approved a resolution to designate AMS as an additional planning facility. If this resolution becomes an order, it will authorize the Cuyahoga County local emergency planning committee to request from AMS the information necessary for developing and implementing a chemical emergency response and preparedness plan. On October 11, 1995, the SERC will vote on whether to issue this resolution as an order.

In the minutes of the SERC meetings in which this resolution was discussed, and in letters the SERC has received regarding the resolution, several statements have been found that required clarification concerning NRC oversight of the AMS facility. The statements primarily refer to AMS' inventory of radioactive material, its emergency response plan and exercises, and the security of the AMS facility. In response, Region III (RIII) has written a letter to the SERC that includes clarifying information on these topics.

The letter, which was reviewed by RIII, the Office of Nuclear Material Safety and Safeguards, and the Office of General Counsel, was sent to members of the SERC and others, via fax and express mail, on August 11, 1995.

#### 7. NRC STAFF ACTIONS

The NRC staff is considering what additional information and actions the licensee may need to provide and undertake regarding the following activities (as discussed above): (1) completion of physical inventory, (2) completion of emergency exercise, (3) reduction of radioactive material inventory, (4) decontamination of facility, and (5) decommissioning/decontamination of the Waste Hold-Up Tank room.

**ADVANCED MEDICAL SYSTEMS, INC.  
NORTHEAST OHIO REGIONAL SEWER DISTRICT**

**STRATEGY PLAN**

**Task No. 1 - Resolve Facility Water Issues**

Lead - Region III  
Support - IMNS/NMSS

Task completion date: **November** 1995

Current Status

- \* License amendment # 32, March 17, 1995, authorizes water processing
- \* Wastewater stored outside facility in above ground tanks processed and pumped to "storage bladders" inside the facility
- \* Completed processing of water in and around facility basement, July 1995
- \* Amendment #33, changed analytical laboratory
- \* Amendment #34, changed treated water concentration levels from 200 to 1000 pCi/l
- \* Amendment #35, extended completion date to 7/7/95, except for interceptor decontamination
- \* Amendment #36, authorized RSO to make minor changes
- \* Decontaminated or replaced facility underdrain system
- \* Amendment #37, authorized evaporator installation
- \* Amendment #38, authorized evaporator operation
- \* Amendment #39, deleted milestone dates from subplans 19 D., E., F., requiring written notification and explanation of further extensions

Pending Completion

- \* Implement long term groundwater control and processing program
- \* Evaporate processed water stored in "bladders"
- \* Remediate city sewer interceptor and install new manhole/lateral system

August 28, 1995

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## Task No. 2 - Evaluate Facility Structural Integrity and Reduce Inventory and Decontaminate Facility

### Sub-Task A - Complete Structural Integrity Assessment

Lead - Region III  
Support - IMNS/NMSS

Sub-task completion date: November 1995

- \* Assessment initiated by NRC civil engineer in October 1994 before foundation water problems existed
- \* Re-assessment will commence upon completion of water processing in July 1995
- \* Analytical assessment write-up of building conditions

### Sub-Task B - Reduce Inventory and Decontaminate Facility

Lead - Region III  
Support - IMNS/NMSS, OGC

Sub-task completion date: Late 1996

- \* DFI to include milestones for removal of stuck plug, inventory reduction program, decontamination of facility rooms
- \* Incorporate milestones for inventory reduction through license renewal
- \* Expect inventory reduction program to be completed within 12 months of license renewal
- \* Contractor to mill-out the stuck floor plug in the hot cell after facility water issues are resolved



### Task No. 3 - Develop Contingency Plan to Address Situation Where AMS Abandons the Facility

Lead - IMNS/NMSS

Support - OGC & Region III

Task Completion date: November 1995

In the event that AMS were to abandon the facility, NRC needs a contingency plan that addresses the actions identified below.

#### Actions that must be taken to address proposed situation:

##### Immediate Actions:

- \* Order licensee to take responsibility for actions
- \* Verify that the facility is secure and in a safe shutdown condition.
  - Maintain ADT security services
  - Maintain ventilation and emergency electrical back-up systems
  - Maintain contractor control of basement water
  - Maintain operation and testing of radiological monitoring systems
- \* Consider other federal options such as Superfund (EPA).

##### Short term actions:

- \* Order payment of decommissioning funds into standby trust (currently irrevocable standby letter of credit for \$1.8 million from Bank One, Cleveland)
- \* Work with Trustee to hire contractor for -- Immediate security and maintenance needs and submittal of decommissioning plan
- \* In the event AMS were to file for bankruptcy protection, file a notice of claim in bankruptcy proceeding and/or monitor proceeding.

##### Long term actions:

- \* Review and approve decommissioning plan
- \* Monitor progress of decommissioning and use of funds

## Task No. 4 - Complete Review and Issue License Renewal

### Sub-Task A - Review Safety Program

Lead - Region III

Support - N/A

Sub-task completion date: November 1995

- \* Review completed and deficiency letter issued April 17, 1995.
- \* Review license response to deficiency letter. Response due June 1, 1995
- \* Review licensees response to deficiency letter.

### Sub-Task B - Review Emergency Plan

Lead - Region III

Support - IMNS/NMSS

Sub-task completion date: November 1995

- \* NMSS review completed April 13, 1995
- \* Licensee soliciting comments on its plan from several offsite response organizations
- \* Emergency plan deficiencies identified by NMSS under regional review
- \* Region continues to work with State Emergency Response Commission and County and City emergency planning committees to resolve concerns
- \* Deficiency letter issued 6/7/95
- \* Licensee indicates incorporation of comments into plan by 9/30/95

### Sub-Task C - Review Decommissioning Plan and Cost Estimate

Lead - Region III

Support - DWM/NMSS

Sub-task completion date: November 1995

- \* Review has been completed and deficiency letter issued March 29, 1995
- \* AMS response of May 30, 1995, deemed inadequate, decommissioning cost estimate deemed to low
- \* Letter requesting re-evaluation of cost per cubic foot for waste disposal and site characterization dated 8/17/95
- \* Reply from AMS requested by 9/16/95 to continue review of license renewal application

August 28, 1995



## Sub-Task D - Review Decommissioning Financial Instruments

Lead - Region III

Support - DWM/NMSS

Sub-task completion date: November 1995

- \* Review has been completed and deficiency letter issued March 13, 1995.
- \* Licensee response dated March 31, 1995, forwarded to DWM/NMSS for review on April 14, 1995
- \* Deficiency letter sent to AMS dated 6/28/95 suggesting new Standby Trust Agreement as per Reg Guide 3.66 or modify original 11/92 submission
- \* AMS submitted Standby Trust Agreement sent for contractor review on 8/23/95, expected return in 45 days

## Task No. 5 - Conduct License Renewal Hearing-Subpart L

Lead - OGC

Support - Region III, IMNS/NMSS

Task completion date: OPEN

Presiding Officer has been assigned and parties have been established.

- \* Hearing file filed on April 12, 1995
- \* Presiding officer to issue a schedule for the submission of written presentation
- \* Request from the Village of Newburgh Heights to participate as an interested municipality pending before the Presiding Officer. The staff did not oppose request.
- \* Staff prepare presentation for license renewal hearing. Date for hearing not established.
- \* 8/23/95 Presiding Officer issued Memorandum and Order
  - a. permit LEPC to participate as an interested government party
  - b. grant Village of Newburgh Heights petition to participate as interested municipality
  - c. hold proceedings in abeyance until license renewal application has been reviewed and completed

August 28, 1995

## Task No. 6 - Respond to 10 CFR 2.206 Requests from NEORSD

### Sub-Task A - First Petition dated March 3, 1993

Lead - IMNS/NMSS

Support - OGC

Task completion date: OPEN

Petition Request: 1) AMS assume cost of cleanup of NEORSD  
2) AMS decontaminate sewer connecting London Road facility with public sewer and continue decontamination to extent sampling indicates is necessary

Acknowledgement of Petition: Published in FR on April 13, 1993

#### Status of Director's Decision:

NMSS forwarded draft Director's Decision to OGC for review on December 28, 1994. OGC drafting Commission options paper.

Options paper addresses the scope of responsibility of licensees for offsite contamination as a result of licensed activities, notwithstanding apparent compliance with applicable release limits during the period of those licensed activities, which results in a level of offsite contamination of another person's property that must be controlled and/or remediated.

#### Supplemental Correspondence with NEORSD that is being handled under Petition 1

Letter from NEORSD dated September 13, 1994

- Request: 1) Pursuant to 10 CFR 2.206, NRC commence enforcement action against AMS, pursuant to NRC authority under 10 CFR 20.601 (Violations), for violation of 10 CFR 20.401(c)(3)(Records of surveys, radiation monitoring, and disposal); NEORSD believes disposal records are grossly inaccurate
- 2) NRC commence enforcement action against AMS on violation of 10 CFR 20.303(a) (Disposal by release into sanitary sewerage systems), which requires that all material discharged be readily soluble or dispersible

Letter from NEORSD dated October 13, 1994

Request : 1) In addition to the enforcement actions requested on September 13, 1994, the NRC also commence an enforcement action against AMS for violation of 10 CFR 20.2003 (discharges that are not readily soluble)

### Sub-Task B - Second Petition dated August 19, 1994

Lead - IMNS/NMSS

Support - OGC

Task completion date: CLOSED - June 16, 1994

Petition Request: AMS provide adequate financial assurance to cover public liability pursuant to section 170 of the Atomic Energy Act of 1954, as amended

Acknowledgement of Petition: Published in FR on December 6, 1993

Status of Director's Decision:

Director's Decision signed June 16, 1994, published in FR on June 24, 1994; Petition denied on the grounds that section 170 of the AEA (Price-Anderson) did not apply to this material licensee; NRC policy is not to apply Price-Anderson to specific material licensees.

### Sub-Task C - Third Petition dated August 19, 1994

Lead - IMNS/NMSS

Support - OGC

Task completion date: OPEN

Petition Request: NRC require AMS to install, maintain, and operate a radiation alarm system on all drains at 1020 London Road, Cleveland, Ohio (AMS facility) that lead to either sanitary or storm sewers

Acknowledgement of Petition: Published in FR on September 19, 1994

Status of Director's Decision:

NMSS forwarded draft Director's Decision to OGC for review on February 2, 1995;

Letter to be sent to NEORSD indicating that consideration of this petition is deferred until the hearing under Part 2 Subpart L for AMS license renewal application is completed

Task No. 7 - Respond to 10 CFR 2.802 Requests from NEORSD  
Dated August 2, 1993

Lead - RES  
Support - IMNS/NMSS

Task completion date: Late 1999

- Petition Request:
- 1) NRC amend regulations to require all licensees provide at least 24 hour notice to the appropriate sewage treatment plant before releasing radioactive material to the sanitary sewer
  - 2) NRC exempt materials that enter the sanitary waste stream from the requirement regarding NRC approval for incineration

Acknowledgement of Petition: Published in FR on October 20, 1993

Status of Rulemaking Decision:

In the ANPR signed February 18, 1994, and published in FR on February 25, 1994, entitled Disposal of Radioactive Material by Release into Sanitary Sewer Systems, it was noted that comments on the issue raised by this Petition for Rulemaking would be considered in any possible revision to NRC regulations. Prior to making revisions to the regulations, RES has proposed that a model be developed to evaluate the Part 20 sewer release limits (SECY-95-162 dated 6/20/95).

## Task No. 8 - Characterization/Remediation of NEORSD Facilities

Lead - DWM/NMSS

Support - Region III

Task completion date: March 1997

The current objective is to remediate cobalt-60 contamination so that the NEORSD sites can be eventually released for unrestricted use. To achieve this objective, we will utilize a process consistent with our treatment of other unlicensed SDMP sites. We expect that the NEORSD will propose a decay-in-storage approach as their remediation and waste disposal methods. As discussed with the NEORSD representatives on February 27, 1995, we would likely approve a decay-in-storage approach for controlling subsurface contamination at both the Southerly and Easterly Plant sites with adequate controls. If an appropriate radiological health and safety program is proposed, we do not plan to require an NRC license.

There is no immediate health and safety hazard at the Southerly and Easterly Plants because the contamination is below the surface and the NEORSD's program includes controls and monitoring for any subsurface excavations that could result in public or worker exposure.

### Sub-Task A: Approval of the Southerly Plant Site Characterization Report

Sub-task completion date: October 1995.

The NEORSD's response dated February 27, 1995, to the NRC comments on the site characterization report submitted by the NEORSD dated June 30, 1994; revision of February 1995 report under final review.

### Sub-Task B: Preparation of the Remediation Plan of Southerly Plant Including Waste Disposal Option(s) by the NEORSD

Sub-task completion date: March 1996

NRC expecting submission of a remediation plan, based on the final site characterization report, for NRC's review; expect a decay-in-storage approach to be proposed with appropriate radiological controls over the storage period. We expect NEORSD to submit a remediation plan by October 1995. NEORSD would propose a schedule for "remediation" in their remediation plan.



**Sub-Task C: Performance of Remediation and Final Survey of Southerly Plant by the NEORSD**

Sub-task completion date: March 1997.

NEORSD will perform remediation of the site according to the remediation plan approved under Sub-Task B. Schedules for completion of the remediation would be proposed in the remediation plan. If NEORSD proposes to release site areas for unrestricted use, final surveys would be conducted and the data submitted to the NRC for review.

**Sub-Task D: Review of the Southerly Plant Final Survey Report**

Sub-task completion date: June 1997

IF NEORSD proposes to release site areas for unrestricted use, NRC staff will review any final survey reports and perform confirmatory surveys, if needed.

**Sub-Task E: Review of Easterly Plant Health and Safety Plan**

Sub-task completion date: June 1997

On March 16, 1995, NRC requested NEORSD to provide a description of the radiological controls to be put in place at the Easterly Plant. NEORSD is considering the NRC request. NRC staff would review this plan when it is submitted.

**Sub-Task F: Periodic Site Visits**

Sub-task completion date: Ongoing

NRC inspection staff would conduct periodic site visits to assess the radiological control program implementation. It is expected that site visits would be made on about a five year frequency. NRC inspection staff last visited NEORSD Easterly and Southerly plants during the week of October 31 - November 4, 1994.

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# ADVANCED MEDICAL SYSTEMS, INC. NORTHEAST OHIO REGIONAL SEWER DISTRICT

## STRATEGY PLAN

Task Completion Date

### I. Near Term Operational Issues

November 1995

Task No. 1 - Resolve Facility Water Issues

Task No. 2 - Evaluate Facility Structural Integrity and Reduce Inventory and Decontaminate Facility

November 1995  
Late 1996

- A - Complete Structural Integrity Assessment
- B - Reduce Inventory and Decontaminate Facility

Task No. 3 - Develop Contingency Plan to Address Situation Where AMS Abandons the Facility

November 1995

### II. License Renewal Process

Task No. 4 - Complete Review and Issue License Renewal

November 1995  
November 1995  
November 1995  
November 1995

- A - Review Safety Program
- B - Review Emergency Plan
- C - Review Decommissioning Plan and Cost Estimate
- D - Review Decommissioning Financial Instruments

Task No. 5 - Conduct License Renewal Hearing-Subpart L

OPEN

### III. Petitions

Task No. 6 - Respond to 10 CFR 2.206 Requests from NEORS

OPEN  
CLOSED  
OPEN

- A - First Petition dated March 3, 1993
- B - Second Petition dated August 19, 1994
- C - Third Petition dated August 19, 1994

Task No. 7 - Respond to 10 CFR 2.802 Requests from NEORS  
Dated August 2, 1993

Late 1999

### IV. NEORS Status

Task No. 8 - Characterization/Remediation of NEORS Facilities

March 1997

October 1995

- A - Approval of the Southerly Plant Site Characterization Report
- B - Preparation of the Remediation Plan Including Waste Disposal Option(s) by the NEORS
- C - Performance of Remediation and Final Survey by the NEORS
- D - Review of the Final Survey Report
- E - Review of Easterly Plant Health and Safety Plan
- F - Periodic Site Visits

March 1996

March 1997

June 1997

June 1997

Ongoing

Summary of the telephone conference held at 10:00 am, August 31, 1995 among RIII, OGC, and INMS concerning the AMS site visit and exit meeting on August 30, 1995.

RIII  
CPederson  
BBerson  
KNull

IMNS  
DCool  
FCombs  
GPangburn  
JDeCicco

OGC  
MZobler  
MStein

There will now be an integrated inspection reporting procedure by RIII concerning AMS, with 6-8 week reports.

David Cesar has been appointed Vice President of production, as well as being a chief financial officer of AMS.

Carol Berger is being retained as a member of AMS's Radiation Safety Committee; she will be looking at the overall program at AMS to bring it up to date, eliminate unnecessary procedures, and prioritize the work to be done.

The underdrains have been completely replaced around the building; water from the drains will be collected, tested, and released to the parking lot if not detectable Co-60.

There is approximately 100,000 gallons of processed water in storage, at about 118 pCi per liter (total of 45 microcuries); AMS is working on getting the City of Geneva to take this water into their sewerage system; AMS is not pursuing evaporation of the water at this time.

There is no progress with connecting the lateral to the NEORSO interceptor line.

There has been access denial by NEORSO to the intercept, probable denial until litigation settlement.

WHUT room contains water from flooding; AMS evaluating method of dewatering it, possibly by dehumidifying.

AMS has expended 1 person-rem for the dewatering/drainage remediation since starting the process; 250 mrem was the highest dose to any one individual.

The 4-inch line, and the drainage line around the source lab area (that was left in-ground) still needs to be grouted.

Violations found will be properly documented for access to the public.

KB/13

## STRATEGIC PLAN

1. Sales - (proprietary information) Sales of therap. head is going up, 6 heads this year to India alone, 9 next year; AMS will not be making sources but will buy sealed source to place in heads.

2. AMS plans to ship 5,000 Ci in the next few weeks to NPI

3. Highest Priorities expressed by AMS

- a. remediation program for water and drainage/sewerage discharge
- b. C. Berger to look at license renewal and make a new submission as a revised renewal application; present one is confusing.
- c. AMS wishes more flexibility in its Standard Operating Procedures (this in conjunction with b. above)
- d. expect to have revised application to NRC by end of the year.

4. Emergency plan

- a. a rewrite is desired by AMS, to cross reference the EP with the Reg Guide
- b. Coordination with Cleveland Fire Department indicates that an exercise could be performed within 3 month of the license approval

5. Decommissioning Funding Plan

- a. AMS wishes to submit a "conceptual plan", then submit an instrument to support financial assurance plan
- b. part of the "conceptual plan" is to propose safe storage status of waste and decontamination material on site
  - \*This runs into the face of Timeliness Rule and agency waste disposal policy

## INTERMEDIATE RANGE ACTION

1. Need to recover hot cell function and use; need to have hot cell capability to prepare shipping package of large sources for shipping

2. Finding a place to ship sources

- a. NPI will take 35 sources, total of 20,000 Ci, using NPI casks
- b. J.L. Sheperd a maybe
- c. To get below DFP requirement level in 1 year

3. Emergency plan

## LOW PRIORITY

1. Plug removal

- a. AMS feels low priority because in a safe situation; wish to cleanup hot cell for source shipment
- b. Presently in non-compliance with their license requirement for source

#### inventory

2. Solid waste removal
  - a. wish to use decay as an asset for overall ALARA
  - b. possibly take advantage of new technology
3. Getting rid of water
  - a. not a radiological hazard
  - b. see Cuyahoga Emergency Management Assistance Center (CERMAC) letter dated August 23, 1995

#### ONGOING ACTION

1. Carol Berger is reviewing the Emergency Plan and the renewal application for possible revision
2. Housekeeping improvements - AMS wishing to reclaim some of the London Road facility and make it useable space
3. Public Relations
  - a. wish to improve community relations, get out positive public relations
  - b. possibly have tours of facility
4. Litigation
  - a. NEORSD desires \$2M
  - b. no decontamination of interceptor until litigation settled

#### NRC ACTIONS

1. revamp DFI, soften to be less threatening since AMS seems to be cooperating - RIII
2. revision to license renewal application review
  - a. AMS and NRC could benefit - RIII
  - b. have a bearing on license renewal application hearing - OGC
3. Conceptual plan for decommissioning
  - a. storage vice off-site disposition - IMNS/DWM
  - b. impact on DFP - IMNS/DWM
4. Plug removal/inventory requirement
  - a. presently in violation - RIII
  - b. modify license condition - RIII
5. CERMAC letter of August 23, 1995 determine if this is a 2.206 Petition - OGC

Summary of the telephone conference held at 10:00 am, August 31, 1995 among RII, OGC, and INMS concerning the AMS site visit and exit meeting on August 30, 1995.

1. The underdrains have been completely replaced around the building; water from the drains will be collected, tested, and released to the parking lot if no detectable Co-60. There is approximately 100,000 gallons of processed water in storage, at about 118 pCi per liter (total of 45 microcuries); AMS is working on getting the City of Geneva to take this water into their sewerage system; AMS is not pursuing evaporation of the water at this time.
2. AMS plans to ship 5,000 Ci of sources in the next few weeks to NPI
3. License Renewal Application: AMS expects to submit a revised renewal application to NRC by end of the year.
4. Emergency plan
  - a. a rewrite is desired by AMS, to cross reference the EP with the Reg Guide
  - b. Coordination with Cleveland Fire Department indicates that an exercise could be performed within 3 month of the license approval
5. Decommissioning Funding Plan
  - a. AMS wishes to submit a "conceptual plan", then submit an instrument to support financial assurance plan
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NRC ACTIONS

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  - a. implications for license renewal application hearing - OGC
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  - a. storage vice off-site disposition - IMNS/DWM
  - b. impact on DFP - IMNS/DWM



4. Plug removal/inventory requirement
  - a. presently in violation - RIII
  - b. modify license condition - RIII

5. Determine if letter of August 23, 1995 from Cuyahoga Emergency Management Assistance Center (CEMAC) is a 2.206 Petition - OGC

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