



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

June 28, 1996

MEMORANDUM TO: Josephine M. Piccone, Acting Chief  
Operations Branch, IMNS

FROM: Robert A. Nelson, Acting Chief *Laurence Bell for*  
Low-Level Waste and Decommissioning  
Projects Branch, DWM

SUBJECT: RESPONSE TO REQUEST TO REVIEW OF TECHNICAL ASSIST REQUEST FROM  
REGION III CONCERNING ACCEPTANCE OF A HYDROLOGIST'S EVALUATION  
AND ACCEPTANCE OF SAFSTOR AT ADVANCED MEDICAL SYSTEMS, INC.  
(AMS)

This memorandum is in response to your request to review a Technical Assistance Request from Region III relating to adequacy of the Licensee's current \$1.8 million cost estimate for decommissioning, the issue of soil sampling, and whether NRC would accept the SAFSTOR method for decommissioning the facility.

Please refer to our comments on these issues presented in the attachments. Should you have any questions, please contact Louis Bykoski at (301) 415-6754.

Attachments: As stated

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RESPONSE TO QUESTIONS CONCERNING  
ADVANCED MEDICAL SYSTEMS, INC., ISSUES

Question a. In considering the issue of whether the Licensee's current \$1.8 million cost estimate for decommissioning of the facility is adequate, should NRC accept AMS' hydrologist's opinion that further sampling of the soil below the basement and WHUT room floors is not warranted? If not, what is the alternative?

With regard to the need for further sampling of soils below the basement and WHUT room floors, we agree with Region's opinion that the Donald Jones letter be accepted (see attached comments by Jack Parrott of Headquarters staff).

With regard to the adequacy of the Licensee's current cost estimate, we believe not only is the \$1.8 million estimate inadequate, but also the \$3,304,474 non-SAFSTOR estimate unrealistic (see attached comments by Larry Pittiglio).

Question b. Assuming that the inventory of Co-60 bulk metal and sealed sources at AMS does not significantly change, will NRC accept the SAFSTOR method for decommissioning of the facility?

With regard to the SAFSTOR method for decommissioning the AMS facility, our previous objections provided in the March 20, 1996, letter to Mr. David Cesar continues to be our position. The deferment of decommissioning through implementation of SAFSTOR is only applicable to power reactors.

AMS contends that the GEIS shows SAFSTOR as an acceptable alternative for materials licensees and cites page 04, section 0.2.4, and page 14-9, section 14.3.2.2, as support for materials licensee decommissioning. A careful reading of the various citations shows that the intention of the GEIS was to allow use of a safe storage period of a few days to a few months and not a matter of decades of years.

We refer you to our letter of March 20, 1996, in which we provided our reasons why SAFSTOR would not be an option and that GEIS NUREG-0586 states in Chapter 14 that SAFSTOR for some materials facilities would be an advantage if they are relatively short-lived and would decay to levels permitting unrestricted use of the facility in a short time.