

2/9/95

Blaha for AMS Meeting

On February 6, 1995, Region III and NMSS staff met with Advanced Medical Systems, Inc. (AMS) to discuss the findings of two recent NRC inspections and the licensee's plans to resolve the ground water and building water infiltration problems they have been experiencing since the Northeast Ohio Regional Sewer District (NEORS) installed plugs in the sanitary sewers from the facility. The meeting was conducted in the public with representatives from the NEORS, the City of Cleveland and the Cleveland Plain Dealer present. Following the meeting with the licensee, the NRC staff answered questions from the public. AMS staff also made themselves available to respond to questions from the public.

B/50

Jack Martin
Briefing
2/10/15

STATUS OF AMS ISSUES

WATER ISSUES

- Close teamwork within NRC attacking this project. NMSS and OGC are together with us.
- Maintaining a "stable" situation with groundwater and infiltration. Commitments tied down in CAL.
- Public meeting with licensee Monday (2/6) - discussed water plans and remediation plans. Participants - RIII, NMSS, AMS, NEORSO, Cleveland, Plain Dealer. Meeting went well.
- Plans under final review in RIII and NMSS. Calling licensee today with minor questions. Confirmatory Order will be in HQ for review next week.
- Water processing may begin as soon as 2/20.
- Close coordination with OEPA. Initial water processing to tanks OK. Discharge to sewers will require their review.
- Jim Williams (Ohio governor's liaison with NRC) will be briefed Monday at 1:00

RENEWAL ISSUES

- DFP in NMSS under review. Licensee proposed \$1.8M. Probably a little low. WHUT Room still an issue. Will expedite DFP (30 to 60 days).
- License renewal under review in RIII. Senior staff dedicated to the project. Complex renewal will probably take 90 days to close.
- Four hearing requests were filed (Subpart L). Two or three will likely be admitted.

License conditions for: inventory reduction w/ milestones
• shakedown
• time frame - couple years

B/51



Flow Pathway of
City Sewer



Mandalay Street

← London Road

AMS
Facility

40 feet

MONITORING
Well #1

MONITORING
Well #3

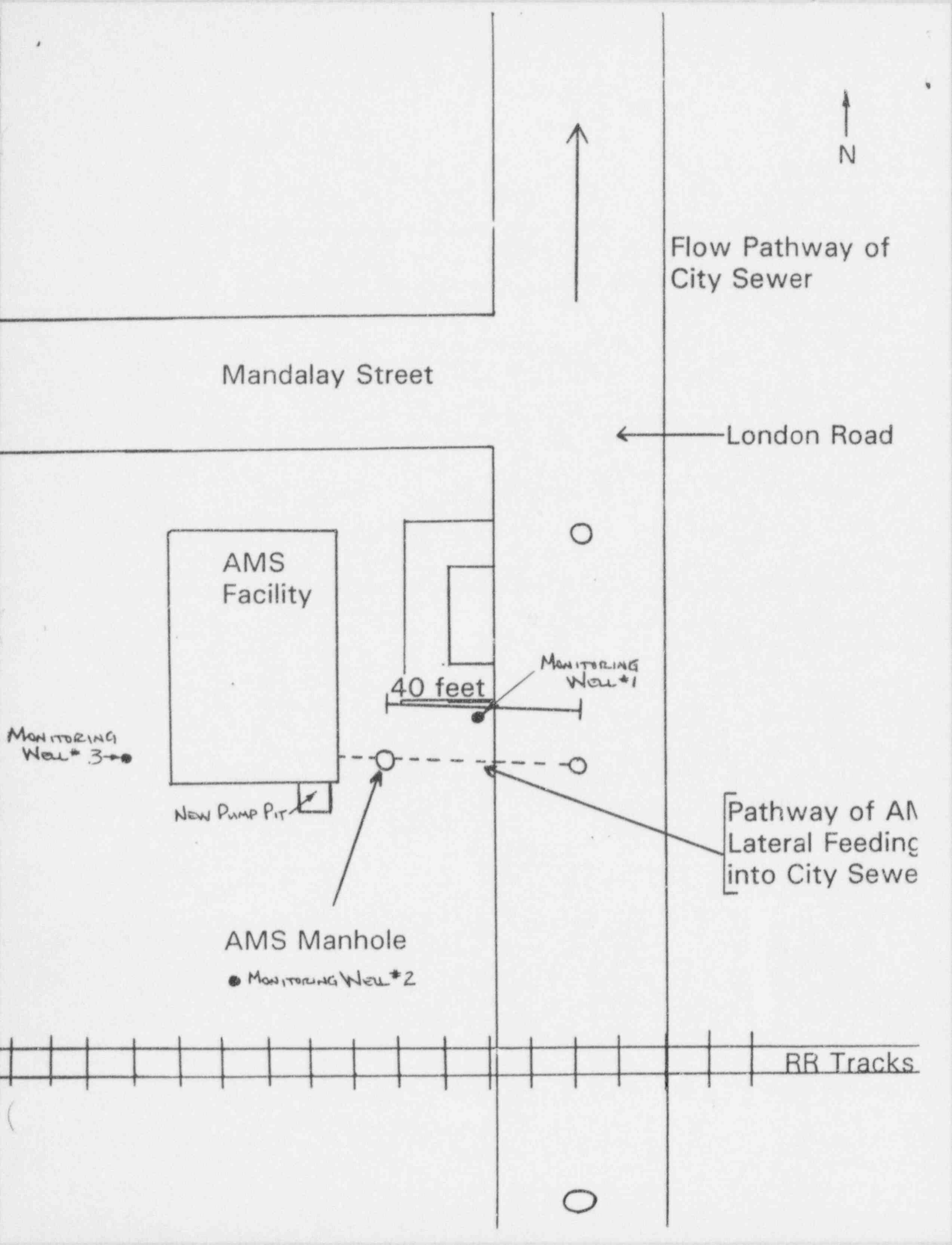
NEW PUMP PIT

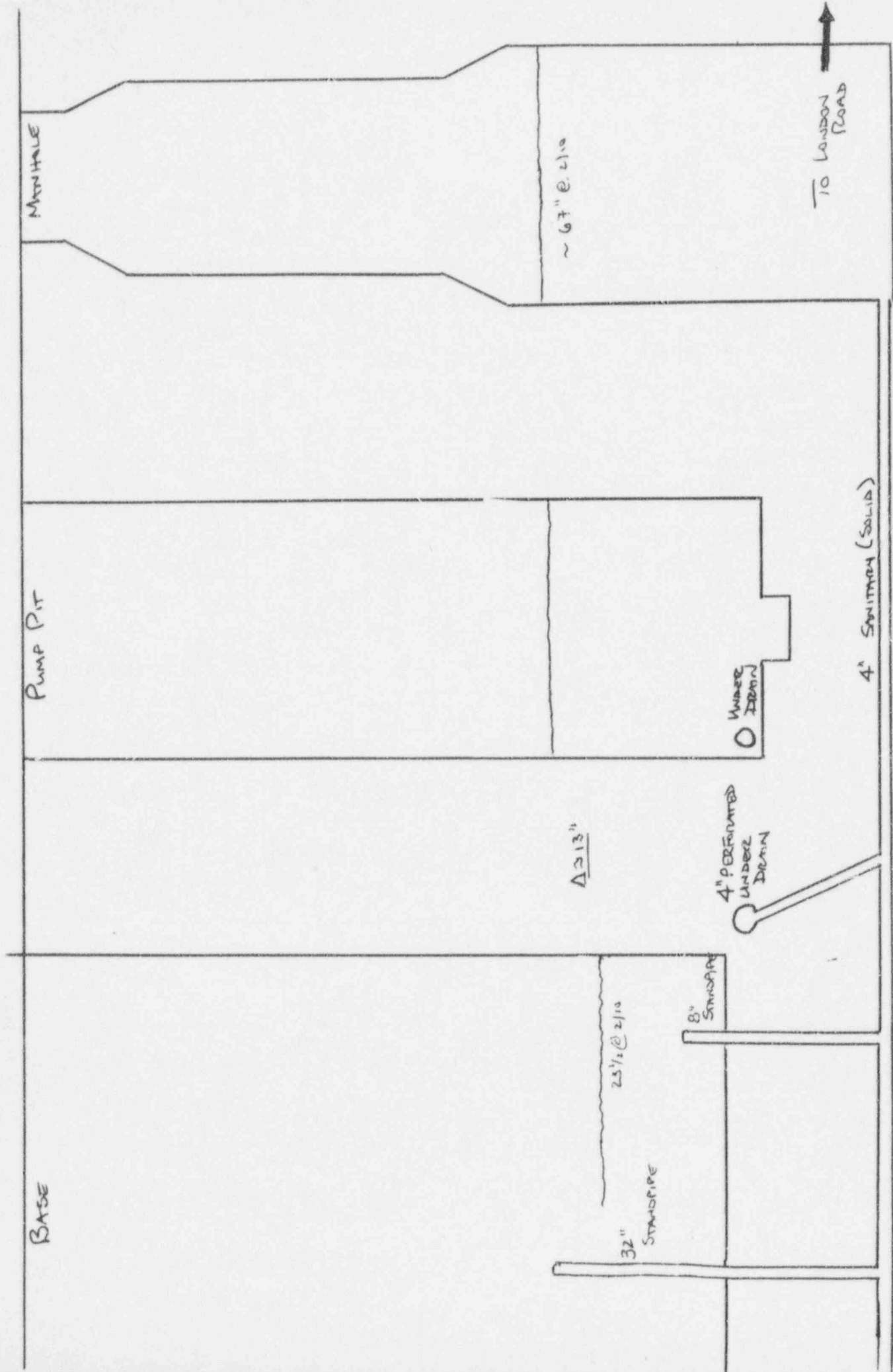
[Pathway of AM
Lateral Feeding
into City Sewer

AMS Manhole

● MONITORING Well #2

RR Tracks





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B/S 2

DCD

February 10, 1995

Advanced Medical Systems, Inc.
ATTN: David Cesar
Treasurer
121 N. Eagle Street
Geneva, Ohio 44041

Dear Mr. Cesar:

This is in response to your proposal for water treatment at the London Road facility, forwarded by Carol Berger's letter dated February 2, 1995.

We have reviewed the procedures and protocols attached to the February 2, 1995 letter and have several questions that must be addressed before we can conclude our evaluation of the proposal. Our questions are listed in the Enclosure.

We will continue our expedited review of your proposal upon receipt of your written response to these questions.

Sincerely,

Original Signed by John A. Grobe

John A. Grobe, Chief
Nuclear Materials Inspection Section 2

Docket No.: 030-16055
License No.: 34-19089-01

Enclosure: Water Treatment
Proposal Questions

See Attached Distribution

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OFFICE	RIII	E	RIII	E	RIII	E	RIII	E
NAME	Slawinski:dp		House		Glinski		Grobe	
DATE	02/10/95		02/10/95		02/10/95		02/10/95	

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Mike Weber (MFW1)
Marian Zobler (MLZ)

Questions Regarding Water Treatment Proposal

General

- (1) What licensed entity will direct the activities? Will the work be performed under the Advanced Medical Systems, Inc. NRC license or Diversified Technologies Services, Inc.?
- (2) Describe the scope of radiological surveillance and coverage that will be provided during the processing project. Who will provide this coverage?
- (3) Will RWPs be developed detailing the radiological controls for various phases of the project? RWPs should address personnel dosimetry requirements, protective clothing and survey requirements, and contamination control mechanisms.
- (4) What are the radiation protection/health physics qualifications of contractor staff? Describe the site specific training that will be provided to contractor staff.
- (5) What provisions will be made for storing and disposing of solid radwaste resulting from the processing activities?

Procedure # MFIX-01 - Mobile Filtration System Operation

- (1) Item 3.3.4 - What are the specific ALARA procedures and safeguards that will be implemented?
- (2) Have contaminated water spill/leak and cleanup procedures been developed for the project?

Procedure # MFIX-02 - Filter Changeout Procedure

- (1) Item 4.11 - Will this step be designated as a health physics "hold point" to provide an opportunity for radiation measurements?
- (2) Item 4.12 - Describe what constitutes "appropriate radiological readings."
- (3) Item 5.0 - Records should include radiological information (e.g. radiation levels on filters, equipment, supplies, etc.).

DTS Sampling Protocol

- (1) Acidification of samples with nitric or other acids could significantly increase the solubility of the cobalt in the untreated sample matrix. Sample acidification prior to filtration may invalidate the filtration study. Please respond to this concern.

- (2) How many samples will be collected per tank? How will the samples be collected? If sample collection will be by a spigot on the tank; (a) where is the spigot located; and (b) how many spigot volumes will be flushed through the spigot before the sample is collected?
- (3) Will provisions be made to supply the NRC with split samples?
- (4) Will any reagents be added to the bulk water prior to its processing? If so, what will be added and why?
- (5) What are the volumes of the tanks that will contain the processed water? What is the capacity of the recirculation pumps and how long will recirculation of three tank volumes take?
- (6) What provisions are in place for contamination control in the event of spills or leaks during the sampling?
- (7) Radiation measurements should be made on basement samples prior to further handling. These samples could contain discrete particles or sediment containing greater concentrations of cobalt.

Procedure # SL13014 - Calibration of the Germanium Spectroscopy System

If the new efficiency curve yields results more than 10% different from the previous efficiency curve, this would indicate significant detector and/or electronics problems. The system should be investigated before being used for sample analysis.

Procedure # SL13017 - Daily Calibration Verification and Maintenance

An optimal daily calibration check should be a spectrum activity analysis of at least two separate radionuclides and not only a logging of total counts in a single peak. The spectrum analysis will verify that the continuum subtraction, half-life correction, peak analysis, etc. of the software are functioning properly.

Germanium Detector Settings

In SOP No. SL13017, the settings for GE1 are Course Gain = 50 and Peaking Time = 8 μ sec, while in SOP No. SL13018, the settings for GE1 are Course Gain = 100 and Peaking Time = 4 μ sec. Are these the same detector; if so, why are the settings different?

Procedure # SL13002 - Gross Alpha/Beta

In the calculations, define "Absolute Efficiency" and "Transmission Factor" and describe how these values are determined.