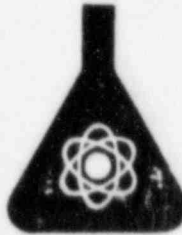


**CHEM
NUCLEAR
SYSTEMS
INC.**



January 14, 1975

Mr. R. H. Engelken, Director
Directorate of Regulatory Operations
1990 North California Boulevard
Walnut Creek Plaza, Suite 202
Walnut Creek, California 94596

Dear Mr. Engelken:

Pursuant to the provisions of Section 2.201 of the AEC's "Rules of Practice," Part 2, Title 10, Code of the Federal Regulations, we submit the following in response to your letter of December 24, 1974.

Regarding Violation A as identified in the enclosure -- Description of Violations, please be advised that:

- (1) Receipt of packages of waste containing more than 15 grams of U-235 was discontinued on November 23, 1974.
- (2) Amendment to South Carolina License No. 097 was requested and the requested amendment No. 9 was issued on December 16, 1974.
- (3) Full compliance was achieved on November 23, 1974.

Violation B as identified in the enclosure -- Description of Violations, concerns an environmental monitoring program which was included as Appendix 6 to our amended application, dated February 24, 1972. Following the initial burial of radioactive wastes in mid-1971 as authorized by Amendment No. 3 to our South Carolina License No. 097, we initiated a program to develop an environmental monitoring program in conjunction with the State of South Carolina which would provide the required data to insure the prompt detection of any movement of radioisotopes from our facility by any means. Following is an outline of the current program:

- (1) All burial trench wells which contain any liquid are sampled on a quarterly basis. Analyses are made for gross alpha and beta and for tritium. Once per year a gamma scan is run on these samples.

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- (2) All burial trench wells which do not contain liquid are sampled on a monthly basis. If liquid is observed, samples are obtained and analyses set forth in (1) above are carried out.
- (3) Two wet wells located within 1500 feet of any burial trench are sampled on a semi-annual basis. Analyses are made for gross alpha and beta and for tritium.
- (4) Six each soil and vegetation samples are obtained on an annual basis from pre-determined locations. Analyses are made for gross alpha and beta and a gamma scan is run.
- (5) Ten perimeter wells are sampled on an annual basis. Analyses are made for gross alpha and beta and for tritium.
- (6) Approximately six random samples are taken daily of soil from the burial area environs. These samples are qualitatively counted for beta and gamma. If significant qualitative results are observed, quantitative analyses are made for gross beta.
- (7) A continuous air sampler is operated down wind from the burial trench area. The filter paper is monitored daily with a portable instrument and is changed weekly at which time a quantitative determination of the airborne radioisotope concentration is made.
- (8) Eleven TLD's are located at selected locations on the perimeter fence. These TLD's are changed on a quarterly basis.

We feel, and the State of South Carolina concurs, that the foregoing environmental program is more than adequate and meets the intent of the original program as outlined in the referenced Appendix 6.

In a further effort to assure compliance, we are initiating a thorough review of the current environmental monitoring program. We are planning to submit an application for Amendment to our License AEC 46-13536-01 in the near future, at which time we shall include revised and updated methods and procedures for our operations.



Sincerely,

CHEM-NUCLEAR SYSTEMS, INC.

Bruce W. Johnson
Bruce W. Johnson
President