

3/24/95

Advanced Medical Systems, Inc.,  
Cleveland, Ohio, Notice of Amendment  
to Byproduct Material License No.  
34-19089-01 and Opportunity for  
Hearing

This provides notice to the public that the U.S. Nuclear Regulatory Commission has issued a license amendment to Byproduct Material License No. 34-19089-01 issued to Advanced Medical Systems, Inc. for possession and use of byproduct material, cobalt-60 and cesium-137, at the licensee's Cleveland, Ohio facility. The licensee requested the amendment by letter dated March 1, 1995, to establish a plans and schedules for 1) dealing with the accumulation of ground water in and around the AMS facility basement and that stored in above ground tanks, 2) immobilizing and/or remediating contamination that has collected in below ground sewage piping and manholes, and 3) processing ground water that may build up around the facility in the future. The amendment requires that these activities begin immediately and be completed within 90 days. The license amendment references letters from the licensee dated January 27, February 2, 10, 14, and March 1, 3, 8, and 10, 1995.

The NRC hereby provides notice and an opportunity for a hearing on the license amendment under the provisions of 10 CFR Part 2, Subpart L, "Informal Hearing Procedures for Adjudications in Materials and Operator Licensing Proceedings." Pursuant to Section 2.1205(a), any person whose interest may be affected by this proceeding may file a request for a hearing in accordance with section 2.1205(c). A request for a hearing must be filed within thirty (30) days the date of publication of this Federal Register notice.

The request for a hearing must be filed with the Office of the Secretary either:

(1) By delivery to the Docketing and Service Branch of the Office of the Secretary at One White Flint North, 11555 Rockville Pike, Rockville, MD 20852; or

(2) By mail or telegram addressed to the Secretary, U.S. Nuclear Regulatory Commission, Washington, DC 20555, Attention: Docketing and Service Branch.

In addition to meeting other applicable requirements of 10 CFR Part 2 of the NRC's regulations, a request for a hearing filed by a person other than an applicant must describe in detail:

- (1) The interest of the requestor in the proceeding;
- (2) How that interest may be affected by the results of the proceeding, including the reasons why the requestor should be permitted a hearing, with particular reference to the factors set out in section 2.1205(g);
- (3) The requestor's areas of concern about the licensing activity that is the subject matter of the proceeding; and
- (4) The circumstances establishing that the request for a hearing is timely in accordance with section 2.1205(c).

Each request for a hearing must also be served, by delivering it personally or by mail to:

(1) The licensee, Advanced Medical Systems, Inc., to the attention of Seymour S. Stein, PhD., President, 121 North Eagle Street, Geneva, OH 44041; and

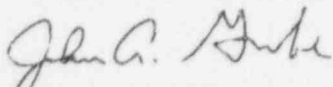
(2) The NRC staff, by delivery to the Executive Director for Operations, One White Flint North, 11555 Rockville Pike, Rockville, MD 20852, or by mail

Commission, Washington, DC 20555.

For further details with respect to this action, see the licensee's request for license amendment dated March 1, 1995, and the letters referenced above, which are available for inspection at the Commission's Region III Office, 801 Warrenville Road, Lisle, Illinois.

Dated at Lisle, Illinois, this 24th day of March, 1995.

For the Nuclear Regulatory Commission,

A handwritten signature in cursive script, appearing to read "John A. Grobe".

John A. Grobe, Chief  
Nuclear Materials Inspection, Section 2,  
Division of Radiation Safety and Safeguards,  
RIII

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For the Nuclear Regulatory Commission,

John A. Grobe, Chief  
Nuclear Materials Inspection, Section 2,  
Division of Radiation Safety and Safeguards,  
RIII

To receive a copy of this document, indicate in the box "C" = Copy without attach/encl "E" = Copy with attach/encl "N" = No copy

OFFICE	RIII		RIII	C	OGC - No legal		NMSS 66	
NAME	Berson/jr		Grobe		objection 66 for Marian		For C. Horen D. Lohr per	
DATE	03/24/95		03/24/95		03/24/95 by telephone		03/22/95 by telephone	

OFFICIAL RECORD COPY

06-C

3/24.

3/24.

des to

more realistic

points to be included in  
letter to Arms re our carrying  
over their lost equipment

B/114

At 11:45 - 1:15  
or more

Soil problem - need to get 7' - 10' high down?  
under 10' to get to soil  
potentially back to good soil  
Also in Tanks?

SUBJECT: REVIEW OF ADVANCED MEDICAL SYST MS, INC., DECOMMISSIONING COST  
ESTIMATE FOR THE LONDON ROAD SITE IN CLEVELAND OHIO (NRC LICENSE NO. 34-  
19089-01), TICKET D-053

U.S. and  
with 2

I have completed my review of the Advanced Medical Systems, Inc. decommissioning cost estimate for the London Road site and concluded that the estimated cost of \$1,795,612 may not realistically reflect the cost to decommission the facility. The basic reasons for my concerns about the cost estimate are: 1) the cost estimate is based on the assumption that the soil under the building is uncontaminated; 2) the disposal cost was based on a cost of \$181 per cubic foot; 3) demolition of the building is not required; and 4) W.H.U.T. Room requires remote decontamination techniques for decontamination; however, the cost estimate provides only a cost price quote not a cost estimate to decontaminate the facility.

What you  
that?  
cost  
to be  
part of  
contaminated  
well

Section 4.1 "Cost Modifying Factors" states that the cost of radwaste processing, shipping, and disposal account for about 20 percent of the total decommissioning cost. This is based on a disposal cost of \$181 per cubic, and using a more realistic cost of approximately \$400 to \$450 per cubic foot would result in an increase in decommissioning cost of 20 to 25 percent. Based on the fact that the Midwest Compact disposal site has not even been selected in Ohio, the \$400 to \$450 cost range per cubic foot is a reasonable estimate. In addition, based on recent water problems at the site, three additional problems have resulted that may significantly impact the cost of decommissioning the London Road site. The three problems are: 1) the water problem has potentially structurally damaged some parts of the buildings resulting in possibility that some of the buildings may have to be demolished; 2) the concrete slab may have to be removed from the Hot Cell as a result of the water causing additional contamination of the concrete; and 3) the contaminated water may have caused extensive soil contamination. Based on past experience, the impact of having to remove and dispose of the contaminated concrete, and to remove and dispose of significant quantities of contaminated soil, the cost estimate for the Advanced Medical Systems, Inc. London Road site may be several times greater than the initial estimate.

Where unit prices and labor rates were used in the cost estimate, the unit price estimates and labor rates were in a reasonable range. The tables in the cost estimate identifying the decontamination activity, the areas/volumes to be decontaminated, the hours to complete the activity were in reasonable range. Section 4.1 "Cost modifying Factors" included a work difficulty factor adjustment, and a contingency factor of 25 percent was included in the cost estimate. The basis for the comparison was the "1993 Means Building Construction Cost Data," the "1992 Means Labor Rates for the Construction Industry," and unit costs for similar decommissioning activities at Fort St. Vrain and Yankee.

Based on the current conditions at the Advanced Medical Systems, Inc. London Road site, the estimated cost of \$1,795,612 may be off by several times the actual cost to decommission the site. As we discussed above, significant changes in the quantities will have a significant impact on the total decommissioning cost. In order to have a reasonable level of confidence in

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the cost estimate, I recommend that we require Advanced Medical Systems, Inc. to conduct a detailed structural evaluation of the existing buildings, and to conduct a detailed characterization to determine the extent of the concrete and soil contamination identified above.

If I can be of any additional help, please contact me on 415-6702.

Larry Pittiglio (P:\AMS)

FAX → 301-415-5377  
E-Mail (CLP)

Licensee: Advanced Medical Systems, Inc.

Event Number: N/A

Facility: Advanced Medical Systems, Inc.

Event Date: 03/27/95

City: Cleveland

State: Ohio

Unit: N/A

Region: 3

Rx Info: N/A

Location Code: N/A

Dockets: 030-16055

Notification Date and Method: 03/28/95 notification to onsite NRC personnel

Subject: THEFT OF GOVERNMENT PROPERTY

Contact: John A. Grobe  
708-829-9806

Discussion: Sometime between 4:30 p.m. on March 27, 1995, and 7:00 a.m. on March 28, 1995, the Region III Mobile Environmental Radiation Laboratory (Lab) was burglarized. The Lab was locked and located at the Advanced Medical Systems, Inc. (AMS) facility in Cleveland, Ohio inside their locked fenced property. The Lab was supporting the inspection effort regarding the licensees processing of contaminated waste water that has accumulated in and around the facility. The Lab was not readily visible from the street.

Several pieces of computer equipment and tools valued at approximately \$10,000 were stolen. No readily apparent damage was done to other equipment in the Lab, including the solid state detector. The radioactive sources used for testing and calibration purposes were not disturbed. The Cleveland Police Department and Federal Protective Service have been notified and are investigating the theft. After all investigative activities are completed with the Lab, it will be moved to a City of Cleveland facility several miles from AMS where more secure protection can be provided.

Regional Action: Replacement equipment and a detection system expert will be flown to the site on March 29, 1995, and the Lab will be repaired allowing continuing support to the inspection effort. After the Lab is returned to Region III, security specialists will evaluate physical protection improvements that may be appropriate for the Lab.

*Handwritten signature*

*Handwritten: 6/115*