

From: Wayne J. Slawinski (WJS2), RTTI
To: CH1:HMS3:HMS1:TW4:TW8:JXD] DeCicco, Nms
Date: Wednesday, May 31, 1995 6:01 pm
Subject: NEORSO Petitions and AMS Inspections -Rep

I agree with most of what you stated. However, the following additional and clarifying information is provided:

Insp Rpt # 93003 (issued 11/7/94) and its associated NOV (issued 3/15/95) discusses two violations

(1) Failure to conduct evaluations pursuant to 10 CFR 20.201(b), to assure compliance with sewer discharge limits in 20.303. Specifically, not evaluating sewer discharges resulting from floods.

(2) License Condition violation for failure to filter wastewater pumped from WHUT room tanks.

The 9/13/94 petition refers to violations of 20.401 (disposal records) and 20.303 (discharge of mtl that was not soluble or dispersible). As you can see, the petition referenced violations differ from those cited in the 3/15/95 NOV.

Inspection Rpt # 94003 (issued 12/6/94) cites an apparent violation of 20.2003, for a sewer discharge that was not readily soluble or dispersible biological mtl. You are correct in that an NOV was not issued because the water sample which was the bases for the apparent violation, was discarded by the sewer district before we could conduct solubility studies on it. This apparent violation does coincide precisely with the 10/13/94 petition.

Your recollection is correct in that a letter was prepared for submittal to AMS which would explain why the apparent violation in the 12/6/94 inspection report would not be cited. A draft of this letter was initially routed to OGC and your shop (Haney) in mid-April. The letter was revised, approved by OGC, and provided to Cathy Haney on May 5. We are awaiting IMNS to approve the letter so it can be issued out of the region. Hopefully, you can tell me what its status is.

Please let me know if you need additional info. Also, let me know what the status of the violation retraction letter is. I intend to monitor my e-mail during course breaks.

Wayne

WJS