

## CITY OF CLEVELAND

## LAW DEPARTMENT

## TELECOPIER TRANSMITTAL COVER PAGE

Date: May 2, 1995 Time: 4:40 p.m.Page(s) including this cover sheet: 3

SENT FROM: Martha R. McCorkle, Assistant Director of Law  
Cleveland Law Department/ Room 106 - City Hall  
601 Lakeside Avenue  
Cleveland, Ohio 44114 (216) 664-4332

If all pages are not received, please call (216) 664-2800 to advise.

SENT TO:

NAME: John MaderaUS NRCPHONE NO.: \_\_\_\_\_ FAX NO.: 708-515-1259IN RE: Permit Application for 1020 London RoadDESCRIPTION: Letter

REMARKS: \_\_\_\_\_

CONFIDENTIALITY NOTICE

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B/148



# City of Cleveland

MICHAEL R. WHITE, MAYOR

DEPARTMENT OF LAW  
SHARON BOBOL JORDAN  
DIRECTOR

May 5, 1995

ROOM 108, CITY HALL  
801 LAKESIDE AVENUE  
CLEVELAND, OHIO 44114  
(216) 691-2801

Advanced Medical Systems, Inc.  
David Cesar, Treasurer  
121 North Eagle Street  
Geneva, Ohio 44041

Re: Permit Applications for 1020 London Road  
By FAX an Regular U. S. Mail

Dear Mr. Cesar:

As informed you during our meeting on Wednesday, April 26, 1995, the City forwarded the two permit applications received from AMS, one for excavation of the lateral and manhole, and one for the installation and operation of the evaporation system, to the Region V offices of the United States Environmental Protection Agency (US EPA). As US EPA Inspector Mike Murphy explained at our meeting, the US EPA's Air and Radiation Division has jurisdiction over, and technical ability to permit and monitor these activities.

Since the US EPA is the proper permitting agency, and is responsible for approving the methodology, issuing the terms and conditions for the permits needed for both the excavating and the evaporating, and overseeing the work, you do not need a permit from the City to begin work on these projects. The forty dollar (\$40.00) permit application fee submitted by Longo Construction was inadvertently sent to the US EPA Region V offices along with the applications. I am in the process of trying to track down that check and return it to your contractor.

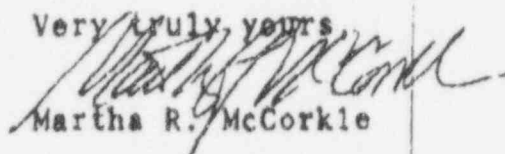
RE: Permit Application  
for 1020 London Road

May 5, 1995

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If you have any questions before or during this proposed work at 1020 London Road, please do not hesitate to call me at (216) 666-4332.

Very truly yours,



Martha R. McCorkle

cc: Mike Murphy, US EPA  
Jack Barnett, US EPA  
John Madera, US NRC  
Tom Lenhart, NEORSD  
Leroy English, NEORSD  
Michael Kalstrom, LEPC  
Dwight Miller, Stavole & Miller  
Judith Zimomra, Mayor's Office  
Tom Root, Division of Fire  
Robert Staib, Department of Public Health  
William M. Ondrey Gruber, Law  
Lisa Thomas, Division of Building and Housing

Please review & provide  
comments as soon as possible.  
Jane Hart's number is:

614-644-2776

AV: 614-644-2256

Thank:

Post-it Fax Note 7671		Date 5-9-95	# of pages 1
To Wayne Stawinski	From C. O. Cline		
Co/Dn: WRC - Region II	Co		
Phone #	Phone # 614-749-5915		
Fax # 708-515-1259	Fax #		

5/9

# MEMORANDUM

TO: ED MECKLENBURG, DIRECTOR  
CUYAHOGA COUNTY EMERGENCY MANAGEMENT AGENCY

FROM: DALE W. SHIPLEY, DEPUTY DIRECTOR  
OHIO EMERGENCY MANAGEMENT AGENCY

SUBJECT: VARIANCE PRESENTATIONS, APRIL 12, 1995

In reference to the Variance presentations <sup>which we discussed</sup>, the following lists some of my observations which may be of use to you:

1. A scenario, as briefed, which assumes the release of all radiological material contained within the AMS facility in any form or location within 10 minutes is unrealistic and unwarranted.
2. The "Hot Cell" is constructed of 5-1/2 feet of reinforced concrete with a one inch steel liner, and is no longer used. The "window" into the Hot Cell is also 5-1/2 feet thick, and is composed of ~~one~~ <sup>a second</sup> layer of glass, ~~another~~ <sup>task, a third</sup> type of glass, ~~a~~ <sup>and</sup> a Zinc Bromide solution, and another layer of glass.
3. The "WHUT" room is below ground level, has 3-1/2 foot reinforced concrete walls, and a door which is sealed and cinder blocked.
4. A negative air pressure is maintained, air filters collect contamination, and a back-up generator is on hand.
5. The new license will probably permit a maximum of 75,000 curies on site, in any configuration. An agreement exists between AMS and the fire department that no one will enter any radiological rooms without a Radiation Safety Officer.   
 *→ The plant will have not been receiving any material. The license only allows possession of sealed sources.*
6. Actions are being taken to decontaminate water currently in the basement.
7. All information and plans are being shared with local and state agencies.   
 *To date, has only run preliminary*  
Additionally, the NRC ~~can~~ <sup>has</sup> projections of off-site exposures which we and Department of Health personnel can go over with you, or we can calculate the off-site consequences of other assumptions, if you desire. ~~At present, they project less than 1 rem off-site and an absolute worst case exposure of 294 millirem, if you stood within 50 miles for an hour. Final projections are being worked on currently.~~

I hope this is helpful. If we can assist you or facilitate any action or information, please let us know. The office phone number is (614) 889-7150.

B1149



OFFICE OF THE  
GENERAL COUNSEL

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

May 10, 1995

Jack Grobe  
R11

Marshall E. Miller  
Presiding Officer  
512 Magnolia  
Frederick, MD 21701

Dr. Harry Foreman  
Special Assistant  
1564 Burton Avenue  
St. Paul, MN 55108

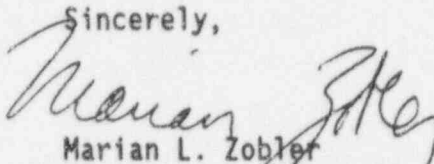
In the Matter of  
ADVANCED MEDICAL SYSTEMS, INC.  
Material License No. 34-19089-01  
Docket No. 30-16055-ML-REN

Dear Administrative Judges:

Pursuant to 10 C.F.R. § 2.1231(c), attached please find the following documents to be included in the hearing file for this proceeding.

15. Letter to Mr. John A. Grobe, Chief, Nuclear Materials Inspection, U.S. Nuclear Regulatory Commission from David Cesar, Treasurer, Advanced Medical Systems, Inc., Re: Extension of Time, April 27, 1995.
16. Letter to Advanced Medical Systems, Inc., Attn: David Cesar, Treasurer from John Madera, Chief, Nuclear Materials Licensing Section, U.S. Nuclear Regulatory Commission, Re: Granting Extension Request, May 4, 1995.

Sincerely,

  
Marian L. Zabler  
Counsel for NRC Staff

cc w/encl.: Service List

2/150

9505180416

1A

MAY 12 1995



# Advanced Medical Systems, Inc.

121 North Eagle Street • Geneva, Ohio 44041  
(216) 466-4671 FAX (216) 466-0186

**FAXED**  
10:42 AM  
4-28-95

Document 15

April 27, 1995

Mr. John A. Grobe, Chief  
Nuclear Materials Inspection  
Section II  
U.S. Nuclear Regulatory Commission  
Region III  
801 Warrenville Road  
Lisle, Illinois 60532-4351

Dear Mr. Grobe:

I am in receipt of your letter dated March 30, 1995, regarding questions concerning the Decommissioning Funding Plan. Your letter requested a response within thirty days of the date of this letter.

I informed you in March that I would be out of the country for several weeks in April. I would be leaving on April 2. As I have just returned, I am not in a position to respond by April 30, 1995, to your questions.

I am requesting an extension of thirty days. We will have a response to you by May 31, 1995.

If you have any questions, please do not hesitate to contact me.

Sincerely,



DAVID CESAR  
Treasurer

DC/cs

cc: [illegible]

REGION III

9702060263 1P.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION III  
801 WARRENVILLE ROAD  
LISLE, ILLINOIS 60532-4351

Document 16

May 4, 1995

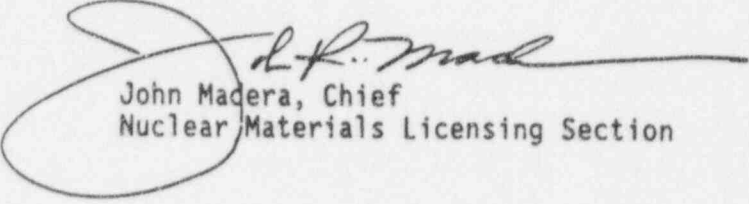
Advanced Medical Systems, Inc.  
ATTN: David Cesar  
Treasurer  
121 North Eagle Street  
Geneva, OH 44041

Dear Mr. Cesar:

Pursuant to your request in letter dated April 27, 1995, you are hereby granted an additional 30 days in which to respond to our letter of March 30, 1995. We will expect a response no later than May 30, 1995.

If you have any questions, please feel free to contact Kevin Null of my staff at (708) 829-9854.

Sincerely,



John Madera, Chief  
Nuclear Materials Licensing Section

4505110416 1P



# Advanced Medical Systems, Inc.

1020 London Road  
Cleveland, OH 44110  
(216) 692-3270

May 15, 1995

Mr. James Caldwell  
Deputy Director  
Division of Radiation Safety and Safeguards  
U. S. Nuclear Regulatory Commission  
801 Warrenville Road  
Lisle, Illinois 60523-4351

Dear Mr. Caldwell:

We have been advised by Alaron that the cutting rig to remove the stuck floor plug is nearing completion.

Please be advised that Advanced Medical Systems, Inc. and Alaron intend to delay the project to remove the stuck floor plug until the current water and sewer remediation project is completed. This action is being taken to ensure that our staff and contractors maintain adequate and proper radiological safety. The Isotope Shop is a relatively small area and is not conducive to the projects proceeding concurrently.

Sincerely,

ROBERT MESCHTER  
Radiation Safety Officer

RM/cs

B/151

9505310503 18



## CONVERSATION RECORD

TIME DATE  
(time) 5/17/95☐ VISIT☐ CONFERENCE☒ TELEPHONE☐ INCOMING☒ OUTGOING

NAME OF PERSON(S) CONTACTED OR IN CONTACT

Bob Meschter and Carol Berger

ORGANIZATION (OFFICE, DEPT. ETC.)

TELEPHONE NO.

## SUBJECT

Licensee's amendment request in letter dated May 3, 1995

## SUMMARY

In lieu of mailing a deficiency letter, the attached deficiencies were discussed between Wayne Slawinski and Mike Weber of the NRC, and Mr. Meschter and Ms. Berger of AMS during a telephone call on May 17, 1995

## ACTION REQUIRED

Licensee to FAX response.

NAME OF PERSON DOCUMENTING CONVERSATION

Kevin G. Null

SIGNATURE

K. G. Null

DATE

5/18/95

## ACTION TAKEN

SIGNATURE

Wayne Slawinski

TITLE

Sr. Radiation Specialist

DATE

5/18/95

B/152



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION III  
801 WARRENVILLE ROAD  
LISLE, ILLINOIS 60532-4351

Advanced Medical Systems, Inc.  
ATTN: Mr. Robert Meschter  
Radiation Safety Officer  
1020 London Road  
Cleveland, OH 44110

Dear Mr. Meschter:

We have reviewed your letter dated May 3, 1995 requesting an amendment to NRC License Number 34-19089-01 and find that we will need additional information as follows:

I. Count Times and MDA

Item 2 of your March 3, 1995 letter indicates that count times should be sufficient for an MDA of 20 pCi/l. Be advised that the MDA is required to be 20 pCi/l to satisfy the solubility criteria established in item 6 of the letter. Please confirm that the MDA will be less than or equal to 20 pCi/l.

II. Procedure LAL-91-SOP-0063

A. Item 2.1

The type of analysis for the processed water samples should be clearly stated. For example, AMS's analysis request forms should stipulate the following or equivalent:

1. Analyze each water sample for gamma activity in its unfiltered, non-acidified form;
2. If gamma activity exceeds 20 pCi/l, filter the sample thru a 0.45 micron membrane filter;
3. Re-analyze filtered sample for gamma activity; and
4. Analyze the membrane filter for gamma activity.

B. Item 2.3

Acidification of samples with nitric or other acids and preservatives could significantly alter (increase) the solubility of the cobalt-60 in the untreated sample matrix. Therefore, sample acidification should not be performed prior to conducting the solubility filtration study. Please address this concern.

C. Item 6.0

The procedure suggests that the sample may be filtered if it contains solids. However, in order keep cobalt-60 in concentration, filtering should not be performed prior to determining the gamma activity in the sample. Filtering should only be conducted as part of the solubility testing performed following analysis for gamma activity. Please address this concern.

D. Item 6.1.1

Sample volumes are generally measured in a graduated cylinder and then transferred to the sample analysis container. It is unclear what is being conducted in this step. Please clarify.

E. Item 6.2.6

Provisions should be taken to ensure the sample is mixed thoroughly prior to analysis. Please modify the procedure accordingly.

F. Item 7.1.2

Instrument QC check standards should be counted daily before use of the equipment. The procedure suggests this is done weekly. Please address this concern.

Modification made to the procedure to address the above must be submitted for our review. For those items you feel need be modified as we requested, you must provide justification and alternative procedures if appropriate.

We will continue our review of your application upon receipt of this information. Please reply in duplicate, within 30 days, and refer to Control Number 98546.

If you have any questions or require clarification on any of the information stated above, you may contact us at (708) 829-9887.

Sincerely,

John R. Madera, Chief  
Nuclear Materials Licensing Section