



Advanced Medical Systems, Inc.

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

May 17, 1995

Mr. Wayne Slawinski
Nuclear Materials Inspection, Section 2
United States Nuclear Regulatory Commission
801 Warrenville Road
Lisle, Illinois 60523-4351

Re: Application to Amend USNRC License No. 34-19089-01

Dear Mr. Slawinski:

Recently, Advanced Medical Systems, Inc. (AMS) submitted an application to amend the referenced license number to permit Lockheed Analytical Services (975 Kelly Johnson Drive, Las Vegas, Nevada 89119-3705) to provide confirmatory analyses of water samples collected as part of the water treatment project. The following are responses to your questions regarding that application.¹

Question 1: Confirm the detection limit for gamma spectroscopy results:

Lockheed will ensure a detection limit of 20 pCi of ⁶⁰Co per liter of water.

Question 2: Confirm the procedure and criteria for performing solubility testing, with particular clarification on sample preservatives and filtration:

Each sample will be collected at AMS in two containers. The large container will contain a preservative to retard plate-out of the radionuclides. The aliquot will be subjected to gamma spectroscopy analysis. The small container will not contain any preservatives. This aliquot will be used, as necessary, to complete the solubility testing.

Upon receipt at Lockheed, the large aliquot of each sample will be immediately subject to gamma spectroscopy. No sample preparation, other than transfer to a counting chamber or mixing, will occur.

If the results of the gamma spectroscopy analysis indicate that no detectable ⁶⁰Co is present (e.g., less than 20 pCi/l), the results will be transmitted immediately upon validation to the AMS Project Manager. No additional action will be taken with the large aliquot prior to its being archived.

If the results of the gamma spectroscopy analysis indicate the presence of more than 20 picocuries but less than 200 picocuries of ⁶⁰Co per liter of water, the small aliquot

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¹. The questions have been summarized to reflect those posed to C. D. Berger (Integrated Environmental Management, Inc.) by W. Slawinski in a telephone conversation of May 17, 1995, 12:47 p.m. EST.

will be immediately subject to solubility testing. No additional action will be taken with the large aliquot prior to its being archived.

For the solubility testing, the small aliquot will be drawn through a 0.45 micrometer filter, and the filter will be subject to gross alpha/beta counting. No other sample preparation will be performed. The results of both the gamma spectroscopy and the solubility testing will be transmitted immediately upon validation to the AMS Project Manager. No additional action will be taken with the filter or the residual sample.

Question 3: Justify the use of a marked container rather than a graduated cylinder in SOP-0063, Step 6.1.1:

To determine the volume of water analyzed by gamma spectroscopy, the sample weight (e.g., "sample plus container weight", minus "container weight") and the sample density are used. The volume is not measured. Therefore, a graduated cylinder is not necessary. Please note that Step 6.1.2 specifies that the sample will be re-weighed after Step 6.1.1 is completed.

Question 4: Modify SOP-0063 to ensure that the samples subject to gamma spectroscopy are mixed prior to counting:

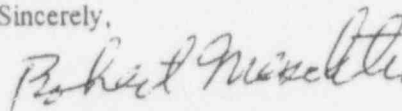
Lockheed has confirmed that they will mix each sample to be analyzed by gamma spectroscopy prior to counting.

Question 5: The frequency of QC checks specified in SOP-0063, Step 7.1.2 should be daily rather than weekly.

Lockheed has confirmed that instrument quality control checks will be performed once per day in order to confirm that the detection system is operating within pre-specified limits.

Your prompt action on our request to forward samples to Lockheed for analysis is necessary in order to avoid yet another delay in the water treatment project. Lockheed has informed us that they are prepared to accept and analyze water samples from AMS pursuant to our specifications and the contents of this letter beginning on Thursday, May 18, 1995. If I can answer any additional questions, or provide clarification on any of the above, please call me at (216) 692-3270.

Sincerely,



Robert Meschter, RSO

cc: D. Cesar
D. A. Miller, Esq., Stavole & Miller



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

May 18, 1995

OFFICE OF THE
GENERAL COUNSEL

Anthony Stavole, Esq.
Stavole & Miller
1604 Illuminating Building
55 Public Square
Cleveland, OH 44113

VIA FACSIMILE AND
CERTIFIED MAIL

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

Dear Mr. Stavole:

This letter is to confirm our telephone conversation of May 10, 1995. As we discussed, your client, Advanced Medical Systems, Inc., had designated Section 3, "Decommissioning Cost Estimate for the London Road Site in Cleveland Ohio," of its January 26, 1995 submittal regarding its application for renewal of its license as proprietary information and requested that it be held in confidence. I advised you that your client must submit an application and an affidavit to have this information withheld pursuant to 10 C.F.R. § 2.790. I also advised you that the entire submittal had been, inadvertently, placed in the NRC's Public Document Room. I understand that your colleague, Dwight Miller, Esq., who is closely involved with AMS's license application is in the hospital, but that you would get back to me regarding AMS' request. To date, I have not heard back from either you or Mr. Miller. Meanwhile, I have started the process to withdraw the information from the NRC's main Public Document Room and local public document rooms. The information, however, has been in the public domain for approximately four months.

If your client does not submit an application and an affidavit pursuant to 10 C.F.R. § 2.790 within ten (10) days from the date of this letter, the Staff will assume that AMS no longer wishes to designate the information as proprietary. The information, therefore, will be returned to the PDR. A copy of section 2.790 is enclosed for your convenience.

If you have any questions, please feel free to call me at (301) 415-1572.

Sincerely,

Marian L. Zabler
Marian L. Zabler
Counsel for NRC Staff

Enclosure: As stated

cc w/o encl.: Service List

MAY 25 1995

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