DOROTHY

Advanced Medical Systems, Inc.

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May 30, 1995

Mr. John Madera
U. S. Nuclear Regulatory Commission
Region III
801 Warrenville Road
Lisle, Illinois 60532-4351

RE: Decommissioning Funding Plan

Dear Mr. Madera:

In response to your request for information on our Decommissioning Funding Plan, the following are the answers to the concerns you raised:

(1) The cost estimate is based on the assumption that the soil under the building is not contaminated.

Answer: There is no evidence to indicate the soil is contaminated. In NRC possession is the Waste Hold-up Tank Room evaluation which involved three core samples taken under the building. Based on this sampling which was done by an independent lab and contractor, the soil under the building is not contaminated, and accordingly providing financial assurance for contaminated soil is not necessary.

(2) The cost for disposal of solid radioactive waste is based on a cost of $181.00 per cubic foot.

Answer: We were instructed by the NRC that the cost for waste disposal should be based upon Barnwell, South Carolina's waste disposal cost structure. As I am sure you are aware, South Carolina producers are not charged the additional fees that out of state producers are. This reduces the cost to a South Carolina company to approximately $181.00 per cubic foot. Based on NRC direction and Barnwell's historical cost structure, the cost for disposal of solid radioactive waste is correct.

(3) The Decommissioning Funding Plan does not anticipate demolition of the building.

Answer: There is no evidence to indicate that the building would have to be demolished for decommissioning. The building is approximately an 80,000 square foot, two-story structure. Serious contamination is restricted to the WHUT Room and the Hot Cell. The square footage of which is approximately 800 square feet. Accordingly, this small amount of contaminated square footage does not lend itself to demolition of the building.

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(4) The Decommissioning Funding Plan contemplated that the WHUT Room will not require remote decontamination techniques.

Answer: The WHUT Room evaluation, a copy of which the NRC has, indicates that the exposure limits within the WHUT Room are significantly less than those in the NSS Report issued in 1988. This leads us to believe that remote decontamination techniques when the decommissioning takes place will not be necessary. The primary technique used to decontaminate the WHUT Room are anticipated to consist of a limited access shielded vacuum system, extension tools, and scabbling.

Regarding your questions with recent water problems at the facility:

(1) The water may have structurally damaged some parts of the building which would need to be considered in the Decommissioning Funding Plan.

Answer: Discussions with our engineer do not lead us to believe that the building has been structurally damaged due to the basement flooding. No structural damage has been observed. The water's main entrance way was a standpipe and not through breaches in the structure.

(2) The basement floor slab including the WHUT Room floor may have to be removed due to further intrusion of contamination to the concrete.

Answer: The WHUT Room floor will be scabbled to remove decontamination. This method of decontamination may have to be repeated several times. Surveys of the basement floor slab outside the WHUT Room indicate that contamination is not widespread in the floor slab, and it would not have to be removed.

(3) Contaminated water may have migrated causing soil contamination.

Answer: Recent core borings outside the facility in anticipation of drain tile remediation with the recent flooding of the basement indicate that there is no significant contamination. Outside soil will be tested in the area of the four-inch drainline during the work currently being performed to address the flooded basement. At that time, additional sampling will be performed. Based on past surveys, there is no indication that there is significant contaminated concrete or soil on the exterior of the London Road facility. Therefore, the decommissioning cost is correct.

Furthermore, a DFP is a conceptual cost estimate of the cost to decommission a facility. AMS has no plans to decommission the facility, as the company is still in existence and requires the facility to continue operating. The detailed characterization of decommissioning would be done only in the submittal of the application to decommission which AMS is not submitting. The information enclosed is appropriate in detail for the decommission cost estimate to be compiled.

In addition, you had the question regarding costing for the Midwest Compact. As I am sure the NRC is aware, the Midwest Compact will be located in Ohio. The earliest the Midwest Compact will open is projected to be the year 2005; delays are anticipated. There are currently no regional compacts open. The last low-level waste disposal site which was open to Advanced Medical Systems, Inc. was located in Barnwell, South Carolina. We were instructed by the NRC to use Barnwell's cost structure for our waste disposal. Based upon NRC instructions, the assumption that should the Ohio-based Midwest Compact exist, the waste disposal costs for an Ohio company in the Ohio-based Midwest Compact would be approximately the same as for a South Carolina producer with access to the Barnwell disposal site is correct.

Based upon our response, the Decommissioning Funding Plan and Financial Assurance for our facility at 1020 London Road are reasonable.

If you have any further questions, please contact me.

Sincerely,

DAVID CESAR
Treasurer

DC/cs
cc: D. Miller
H. Billingsley
P. Ely
R. Meschter
C. Berger

SERC

.io State Emergency Response Commission

Emergency Planning and Community Right-to-Know
P.O. Box 163669, 1800 WaterMark Drive
Columbus, Ohio 43216-3669

George V. Voinovich
Governor

"W ding to improve statewide preparedness and response to chemical emergencies and to improve public awareness of potential chemical hazards."

May 31, 1995

Advanced Medical Systems, Inc.
121 N. Eagle Street
Geneve, Ohio 44041

Dear Mr. Cesar:

The following comments were developed by Zack Clayton, a health physicist on my staff in the Ohio EPA Division of Emergency and Remedial Response, about Advanced Medical Systems, Inc.'s January, 1995 Emergency Plan for the 1020 London Road, Cleveland, Ohio facility.

1.1 Licensed Activity Description.

This section lists three forms of ^{60}Cobalt at the facility; 23,000 Ci of solid metal bulk, 75,000 Ci of sealed sources, and 15 mCi of sealed calibration sources. It goes on to mention 29 Ci of unspecified material in a location and form that would allow dispersal, most of which is in sealed 55 gallon drums or B-25 boxes. This may be the licensed material, but it fails to mention ^{60}Cobalt Oxide dust in the WHUT room of the basement. I realize this room is sealed, but in an emergency that may cause a breach of the room, this dust is in a readily dispersable form. This material was mentioned in a remedial actions report prepared in February 1988. From the quantities listed in that report about 230 Ci of ^{60}Cobalt should remain in the room, a significant amount and a hazard if the room were breached.

1.2 Area and Facility Description

The floor plans included shows the basement Dry Waste Storage Area and the WHUT room. There is no text in the emergency plan describing this area or any hazards associated with it. There is also no text in the plan describing what, if any hazards are associated with these areas. Specifically, there is no text warning response personnel that they may risk exposure to high radiation fields if they enter these areas.

It is my understanding that since this plan was submitted, the basement area including at least the dry waste storage room has flooded. It would be prudent to indicate in an

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addendum what safety consequences this may have. Flooding was not one of the emergencies covered in the plan, but it now appears to require attention. It is our understanding that the water in the basement has been measured and found to contain 170,000 picocuries/liter. At a minimum, the plan should describe the notifications which would be made and the action plan, should the water from the basement be released in an uncontrolled manner.

Attachment 1: CAP88-PC Summary Output

The scenario for this release uses the WHUT room, as mentioned earlier, an undescribed location. The estimate of release for this room is 15 curies. Calculation indicates this room has up to 230 curies of ^{60}Cobalt remaining. No explanation is given for a partial release of the activity in this room. If the model estimate is that not all of the material is available for release, an explanation should be included in the discussion.

Since there was an evaluation of "loose powdery material" on the floor of the WHUT room in 1988, and the room was sealed shut until the radiation levels are safe in the year 2004 to enter and clean up the room; if for some reason emergency workers entered the WHUT room today, what are the risks, and what precautions; if any, could be taken for safe entry?

Thank you for providing us a copy of the emergency plan and inviting our comments.

Sincerely,

Kenneth A. Schultz, Section Manager
Chemical Emergency Preparedness and Prevention

cc: Jane Harf, Chair, SERC
John Grobe, NRC Region III
Larry Grove, Ohio EMA
Mike Kalstrom, Cuyahoga Co. LEPC
Kevin Zumbro, Ohio EPA