



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON D C 20555-0001

September 12, 1996

MEMORANDUM TO: John R. Madera, Chief
Nuclear Materials Licensing Branch, RIII

FROM: Donald A. Cool, Director
Division of Industrial and
Medical Nuclear Safety, NMSS

SUBJECT: TECHNICAL ASSISTANCE REQUEST RE LICENSE 34-19089-01 AND
FREELY DISCHARGING FOUNDATION DRAINAGE SYSTEM WATER

I am responding to your technical assistance request (TAR) dated July 1, 1996. (Attachment 1) regarding Advanced Medical Systems, Inc. (AMS), request for authorization to discharge water pumped from their foundation drainage system through the new manhole directly to a storm sewer catch basin. Presently, AMS is bound by a court order and NRC license requirements to pump water from the foundation drainage system into hold-up tanks, sample the tanks for the presence of radioactivity, notify the Northeast Ohio Regional Sewer District (NEORS) of pending discharge of each tank, and await results of a NEORS confirmatory sampling effort prior to discharge of water to the sewer. AMS based its request on the following: (1) minimal water pressure differential existed between the inside and outside of the building during the period of time the basement of the London Road facility was flooded (this minimal differential would cause minimal back flow of water from the basement to the outside of the building, preventing contamination from inside to outside of the building); (2) radioactivity was not detected in the shale layer under the facility during the 1995 sewer remediation project; (3) a registered hydrologist's report concluding that the new foundation drainage system is hydraulically connected to the soils under the basement, and if contamination migrated from the basement, it would appear in water pumped out of the system; and (4) over 140,000 gallons of water have been pumped from the existing foundation drain and been confirmed "clean" through laboratory analyses.

Based on the review of the attached submittal, and further supported by IMNS's TAR response dated August 16, 1996 (Attachment 2), we recommend approval of AMS' request to discharge water pumped from the AMS foundation drainage system through the new manhole directly to a storm sewer catch basin, provided the licensee adequately addresses the items raised in the August 14, 1996 (Attachment 3), memorandum to you regarding AMS' water analysis procedures. In particular, the determination of the lower limit of detection addressed on page 7 of AMS' request dated June 25, 1996, is not adequately addressed; the "nominal detection limit" of 70 pCi/liter in determining no detectable cobalt-60 activity is not adequately justified. This approval does not change AMS' responsibility to comply with any court orders, Federal, State or local regulations requirements which relate to discharges.

Attachments: 1. TAR dtd 7/1/96
2. TAR response dtd 8/16/96
3. HQ's memo dtd 8/14/96

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