

OHIO DEPARTMENT OF HEALTH

246 N. HIGH STREET
Post Office Box 118
Columbus, Ohio 43266-0118
Telephone: (614) 466-3543



GEORGE V. VOINOVICH
Governor

PETER SOMANI, M.D., Ph.D.
Director of Health

PRIORITY ROUTING

First	Second
✓ MA	RC
✓ DRA	EC
DRP	SGA
DRS	OL
✓ DMS	PAQ
DRMA	

FILE ML

January 30, 1996

Mr. Hubert Miller
Regional Administrator, Region III
United States Nuclear Regulatory Commission
801 Warrensville Road
Lisle, Illinois 60523-4351

Subject: Advanced Medical Systems Strategic Plan. (USNRC License No. 34-19089-01)

Dear Mr. Miller,

On reviewing the Strategic Plan for the London Road Facility, Revision 1, dated January 15, 1996 the Bureau of Radiation Protection of the Ohio Department of Health noted an area that needs clarification.

On page 4, lines 1 through 6 the document refers to a structure being built to house "contaminated solids from the excavation (rock, soil) that exist outside the AMS facility." Since this soil is contaminated with ^{60}Co this material should be classified as Low Level Radioactive Waste.

As such, The Ohio Department of Health recommends that this material be sent off-site for disposal in a timely fashion. The Department therefore requests a timeline for the off-site disposal of this waste and all other identified wastes at the site.

If we can be of any further assistance to you please do not hesitate to call Mr. Frank Talbot, site coordinator, or myself at (614) 644-2727.

Sincerely,

Ruth H. Vandegrift

Ruth H. Vandegrift, Supervisor
Contaminated Site Section

RHV/FJT/ft

cc: R. Meschter

C/12



Advanced Medical Systems, Inc.

1020 London Rd.
Cleveland, Ohio 44110
216-692-3270

January 30, 1996

Mr. William E. Lee, Chief
Division of Fire
City of Cleveland
1545 Superior Avenue
Cleveland, Ohio 44114

Re: Advanced Medical Systems, Inc., "Emergency Plan", Revision 0, September 21, 1995

Dear Chief Lee:

Advanced Medical Systems, Inc. (AMS) is in receipt of your letter dated November 21, 1995 wherein you provided a comment in reference to Revision 0 of our Emergency Plan. Thank you very much for your input.

AMS is still awaiting comments from the U. S. Nuclear Regulatory Commission in regard to the Plan's contents. Once received, the comments that have been submitted by all first responders, including those provided by the City of Cleveland, will be addressed in a written communication. In the meantime, if you have any questions, or if I can provide you with additional information, please call me at (216) 692-3270.

Sincerely,

Robert Meschter, R.S.O.

cc: D. Cesar
D. Miller
C. Berger (IEM)
M. Weber (USNRC, Region III)

C/13
FEB 08 1996



Northeast Ohio Regional Sewer District

3826 Euclid Avenue • Cleveland, Ohio 44115-2504

216 • 881 • 6600

FAX: 216 • 881 • 9709

January 31, 1996

Dwight A. Miller, Esq.
Stavole & Miller
55 Public Square
1604 Illuminating Building
Cleveland, Ohio 44113

VIA TELECOPIER (216) 771-8048

Re: Proposed Discharge of Tank 877

Dear Dwight:

As we have discussed briefly today, our sampling and analysis of Tank 877 shows that it contains 2.7 (+/- 2.0) pCi/l of insoluble Cobalt-60. See attached Notice of Proposed Discharge and associated analysis and chain-of-custody forms.

As you know, under 10 CFR 20.2003 only material that is readily soluble in water or is readily dispersible biological material may be discharged. Nothing we agreed to in the December 22, 1995 Order on Consent can have changed that federal requirement. As a matter of federal law, therefore, the District cannot accept a discharge containing insoluble Cobalt-60 at any level.

Please provide assurance by the end of business today that Advanced Medical Systems, Inc. will not discharge Tank 877, directly or indirectly, into the Northeast Ohio Regional Sewer District system.

Very truly yours,

Lawrence K. English
Assistant General Counsel

cc: Henry E. Billingsley, II
John Madera, NRC Region III
Richard Connelly, NEORS
John E. Lynch

C/114

The mission of the Northeast Ohio Regional Sewer District is to enhance public health and welfare through the efficient, cost-effective conveyance and treatment of wastewater. This is accomplished by an organization dedicated to professionalism, fairness and consistency that anticipates and responds to the changing environmental needs of the community.

NOTICE OF PROPOSED DISCHARGE

TO: NORTHEAST OHIO REGIONAL SEWER DISTRICT
FROM: ADVANCED MEDICAL SYSTEMS, INC.
DATE: January 29, 1996

Please take notice that Advanced Medical Systems, Inc. proposes to discharge tank 877, a 3000 polyvinyl plastic tank containing foundation footer drain system water at the end of the business day on Thursday, February 1, 1996.

Please guide yourself accordingly.

Dwight A. Miller, sub
DWIGHT A. MILLER

Post-It [®] brand fax transmittal memo 7871		# of pages 4
To: L. ENGLISH	From: KASBERG	
Co: NEORSD LEGAL	Co: WQIS	
Dept: 8	Phone: 200 MIAMI CANT	
Fax: 881-4407	Fax: 45 MICHIGAN FILL	

JAN 31 1996

OUTREACH
LABORATORY
REACHING BEYOND THE STANDARD!!!

PAGE 02

January 31, 1996

Mr. Bill Kasberg
NEORSD
4747 E. 49th St.
Cuyahoga HTS, OH 44125-1011

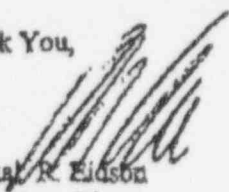
Dear Mr. Kasberg,

Outreach received one sample on January 31, 1996 to be analyzed for Co-60 with an expedited turnaround time. The sample was assigned the following Laboratory Log Number 960018. At your request the sample was filtered to determine the soluble and insoluble Co-60 activity.

The sample was filtered through a membrane filter and analyzed using EPA or other recognized methodology as specified in the report. The membrane filters were counted to determine the insoluble activity.

Should you have any questions, please don't hesitate to call. I want to thank you for your business and we look forward to providing you with future analytical services.

Thank You,


Ronald R. Eldson
Laboratory Director

cc: B. Koh & Associates, Inc.

311 North Aspen • Broken Arrow, OK 74012 • Phone: (918) 251-2515 • Fax: (918) 251-0008

OUTREACH
LABORATORY
ANALYTICAL REPORT

PROJECT NO: 000018CLIENT: N.E.O.R.S.D.DATE SUBMITTED: 30-Jan-86DATE REPORTED: 31-Jan-86

Sample ID	Date	Matrix	Cobalt-60 pCi
LRW-0029-186 SOLUBLE		Water	6.0 +/- 2.4
LRW-0029-186 INSOLUBLE		Solid	2.7 +/- 2.0

FROM: N.E.Q.R.S.D.
4747 E. 49th ST.
CUYAHOGA HTS. OH 44125-1011
PHONE: (216)-841-8000
FAX 216 641 8119
ATTN: ANNA MARIE CONNELLY

MAIL INVOICE IN TRIPLICATE TO:
B. KOH & ASSOCIATES, INC.
c/o NEORSD
10211 A S. DOLFIELD RD.
OWINGS MILLS, MD 21117
PHONE: (301)-358-6612

Page 1 of 1

[illegible]

960018

February 22, 1996

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

Dear Mr. Meschter:

I am writing in response to your recent request to Mr. Michael F. Weber of my staff for information concerning RIII's sampling and analysis of AMS Tank 880.

On February 13, 1995, an NRC inspector went to AMS and took seven water samples from Tank 880. Four samples were obtained from the top of the tank while the water was being recirculated. (The water in the tank had been recirculating for approximately 24 hours.) Three samples were obtained from the bottom outlet valve of the tank. These bottom samples were taken one hour after the recirculation pump had been turned off. Prior to taking the samples, approximately two liters of water was drained from the bottom outlet valve and returned to the tank.

The analysis of the samples from Tank 880 is still in progress. To date, two samples from the top and two samples from the bottom of the tank have been filtered. No Co-60 was detected on the filters from the top samples, but Co-60 was detected on the filters from the bottom samples. (The analysis results are summarized in the enclosure.) Based on these results, we are reviewing the adequacy of your sampling and analysis procedures.

On February 16, 1996, because of the Co-60 detected on the filters, we informed AMS that insoluble cobalt-60 was detected in the water from Tank 880, and therefore, a discharge of Tank 880 would be an apparent violation of 10 CFR 20.2003.

Once our analysis of samples from Tank 880 is complete, you will be provided the complete results. In the meantime, please do not hesitate to contact me should you have any further questions.

Sincerely,

Original signed by

Geoffrey C. Wright, Acting Deputy Director
Division of Nuclear Materials Safety

Docket No. 030-16055
License No. 34-19089-01

Enclosure: As stated

See Attached Distribution

DOCUMENT NAME: G:\LTRS2LIC\MTLS\030\96316055.L03

To receive a copy of this document, indicate in the box: C = Copy without attachment/enclosure E = Copy with attachment/enclosure N = No copy

OFFICE	RIII	C	RIII	C	OGC	C	NMSS	C	RIII	C
NAME	MWeber:dp		JMadera		CHaney		MZoblens		GWright	
DATE	02/22/96		02/22/96		02/22/96		02/22/96		02/22/96	

OFFICIAL RECORD COPY
via e-mail

via phone

9602270401