

December 20, 1994

MEMORANDUM TO: W. L. Axelson, Director
Division of Radiation Safety and Safeguards

FROM: John A. Grobe, Chief
Nuclear Materials Inspection Section 2

SUBJECT: TRIP REPORT - EMERGENCY PLANNING AT
ADVANCED MEDICAL SYSTEMS, INC.

On December 16, 1994, Wayne Slawinski and I met with Capt. Tom Root of the Cleveland Fire Department and Commissioner Robert Staib of the Cleveland Department of Environment to discuss Advanced Medical Systems, Inc. (AMS). We presented a description of the agency, AMS facilities, licensed activities, NRC emergency planning requirements and recent AMS water problems.

Following this meeting, I met with officials from Cleveland, Cuyahoga County, Ohio, the Northeast Ohio Regional Sewer District and AMS to discuss weaknesses in the relationship between the city emergency response personnel and AMS as discussed in our recent inspection report. In the cover letter for that report, AMS was requested to respond to several emergency planning concerns by the end of December 1994. In addition to our concerns, the city was concerned about the level of offsite emergency planning. A listing of meeting attendees is attached.

The city confirmed that AMS had provided adequate training to the city first responders and that they were comfortable responding to an emergency at the facility. The city also indicated that additional training was warranted for its Haz-Mat staff. There was consensus between the city, county and state that a more complete offsite emergency plan may be needed. The state presented the offsite plan for all DOE facilities in Ohio as an example.

I provided a description of the inventory at AMS and suggested that the city and AMS consider completing a hazards assessment and then determine the nature of any additional planning that they believe may be necessary. I indicated that AMS had an emergency plan in place that met NRC expectations, but we were addressing implementation concerns and violations of their plan with AMS. I also presented the generic planning guidance from our NUREGs for projecting offsite doses from fires involving cobalt metal.

Commissioner Staib established a planning group involving AMS, the fire department, emergency medical service, police department and county representatives to meet in early January 1995 to continue discussing this issue and developing a plan and timeline for final resolution of the matter. Capt. Root stated his belief that fire pre-plans could be adequately upgraded in a short period of time.

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Following the meeting on emergency planning, a brief discussion occurred regarding recent water problems at AMS. I provided a description of the Confirmatory Action Letter we issued December 15, 1994, and measurements made December 12-14, 1994, of storm water and waste water.

I believe that as a result of this meeting the city, county and state personnel have a better appreciation of the hazard at AMS, weaknesses in AMS programs, and our oversight of the facility. We will continue our close oversight of AMS and our support to the city answering their questions.

Please contact me with any questions you may have.

cc: H. Miller, DRA
R. Lickus, PAO
W. Slawinski
J. Madera

DOCUMENT NAME: B:\TRIPRPT.AMS

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December 20, 1994

Northeast Ohio Regional Sewer District
ATTN: Mr. Erwin J. Odeal
Executive Director
3826 Euclid Avenue
Cleveland, Ohio 44115-2504

SUBJECT: NRC INSPECTION - RADIOANALYTICAL SAMPLING AND RADIOLOGICAL SURVEY
RESULTS OF THE NORTHEAST OHIO REGIONAL SEWER DISTRICT SOUTHERLY
WASTEWATER TREATMENT PLANT AND EASTERLY WASTEWATER TREATMENT PLANT
(REPORT NO. 999-90003/94060(DRSS))

Dear Mr. Odeal:

This refers to the special inspection conducted by Mr. Michael Kurth of this office from October 31 through December 5, 1994, of the Southerly Wastewater Treatment Plant (SWTP) and Easterly Wastewater Treatment Plant (EWTP). The inspection was prompted by the positive identification of cobalt-60 in a filter cake (sludge) sample collected by the Northeast Ohio Regional Sewer District (NEORS) personnel on September 22, 1994, at the SWTP. The NRC inspector, working with the assistance of the Ohio Department of Health personnel, collected sewer waste water, sludge, and ash samples for radiological analysis and performed surveys of SWTP and EWTP treatment process areas.

The enclosed copy of our inspection report identifies the areas surveyed during the inspection. The inspection consisted of beta/gamma surveys and the collection and radiological analysis of sewer waste water, sludge, and ash samples.

As a result of the inspection, we have no health and safety concerns. Surveys conducted during the inspection did not identify any areas of elevated exposure rates within the SWTP and EWTP treatment process areas. No cobalt-60 concentrations were identified above the minimum detectable levels in the 81 samples collected from the SWTP and the EWTP treatment process areas. However, trace amounts of iodine-131 ranging from 0.7 to 1.4 picocuries per gram (pCi/g) were identified in five samples taken at the SWTP on November 1, 1994. Also, the SWTP incinerator ash samples (3 per day) were identified as containing trace quantities of: beryllium-7 ranging from 12 to 32 pCi/g; thallium-201 ranging from 12 to 75.7 pCi/g; and radium-226 ranging from 3 to 10 pCi/g. The concentrations of iodine-131 and beryllium-7 identified in the SWTP samples were below the 10 CFR Part 20.2003, "Disposal for Release into Sanitary Sewerage" limits.

The State of Ohio regulates the use of accelerator produced radionuclides and naturally occurring radionuclides. Therefore, thallium-201 (accelerator produced) and radium-226 (naturally occurring) are considered to be regulated by the State of Ohio. A copy of this report will be issued to the Ohio Department of Health for their review of these findings.

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Mr. Erwin J. Odeal

-2-

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter and the enclosed inspection report will be placed in the NRC Public Document Room.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

Original Signed By
W. G. Snell for

Gary L. Shear, Chief
Fuel Cycle and Decommissioning Branch

Enclosure: Inspection Report No.
999-90003/94060(DRSS)

cc w/encl: T. Adams, B. Koh & Associates
B. Koh, B. Koh & Associates
C. Tropal, Earth Day Coalition
The Honorable H. K. Metzenbaum, U. S. Senate
T. Brady, Board of Health, County of Cuyahoga
R. Owen, Ohio Department of Health
M. White, Mayor, City of Cleveland

bcc w/encl: J. Turdici, OEDO
J. T. Greeves, NMSS
E. W. Brach, NMSS
J. H. Austin, NMSS
T. C. Johnson, NMSS
M. Nalluswami, NMSS
C. G. Jones, NMSS
R. L. Fonner, OGC
W. L. Axelson, RIII
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DATE	12/14/94		12/16/94		12/16/94		12/20/94	

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Mr. Erwin J. Odeal

-2-

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter and the enclosed inspection report will be placed in the NRC Public Document Room.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

Original Signed By
W. G. Snell for

Gary L. Shear, Chief
Fuel Cycle and Decommissioning Branch

Enclosure: Inspection Report No.
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cc w/encl: T. Adams, B. Koh & Associates
B. Koh, B. Koh & Associates
C. Trepal, Earth Day Coalition
The Honorable H. K. Metzenbaum, U. S. Senate
T. Brady, Board of Health, County of Cuyahoga
R. Owen, Ohio Department of Health
M. White, Mayor, City of Cleveland

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 999-90003/94060(DRSS)

License No. Non-Licensee

Organization: Northeast Ohio Regional Sewer District (NEORSO)
Cleveland, Ohio

Inspection At: NEORSO Southerly Wastewater Treatment Plant
6000 Canal Road
Cuyahoga Heights, Ohio 44125

NEORSO Easterly Wastewater Treatment Plant
14101 Lakeshore Boulevard
Cleveland, Ohio 44110

On-site Inspection Conducted: October 31 through November 4, 1994

Inspector:

Michael F. Kurth
Michael F. Kurth
Radiation Specialist

12/14/94
Date

Accompanying Personnel: Frank Talbot, Ohio Department of Health

Approved By:

William S. Shear
Gary L. Shear, Chief/
Fuel Cycle and Decommissioning Branch

12/16/94
Date

Inspection Summary

On-site inspection on October 31 through November 4, 1994, and sample analysis through December 5, 1994 (Report No. 999-90003/94060(DRSS)).

Areas Inspected: This was a special inspection conducted to perform surveys of the Northeast Ohio Regional Sewer District (NEORSO) Southerly Wastewater Treatment Plant (SWTP) and Easterly Wastewater Treatment Plant (EWTP) treatment process areas. Sewer waste water, sludge, and ash samples were collected at different treatment process locations at the SWTP and the EWTP for gamma-radiological analysis.

Results: The NRC inspector did not identify any appreciable exposure rate readings above background of the treatment process areas at the SWTP and the EWTP. The radiological analysis conducted of the sewer waste water, sludge and ash samples did not identify any concentrations above the minimum detectable activity for gamma emitting radionuclides, in particular, cobalt-60. However, trace amounts of thallium-201, radium-226, thorium-232, iodine-131, and beryllium-7 were identified in certain samples.

DETAILS

1. Persons Contacted

Thomas Lenhart, Assistant General Counsel, Northeast Ohio Regional Sewer District (NEORSO)
*Michael DaDante, Superintendent, NEORSO Easterly Wastewater Treatment Plant (EWTP)
Frank Cuffaro, Superintendent, NEORSO, Southerly Wastewater Treatment Plant (SWTP)
*Tim Tighe, Assistant Superintendent, NEORSO, SWTP
Rich Connelly, Manager, Water Quality and Industrial Surveillance, NEORSO
Frank Talbot, Ohio Department of Health
*K. Ed Houdeshell, Unit Process Manager, NEORSO, EWTP
Tim Atkins, Shift Supervisor, NEORSO, SWTP
Jim Yusko, Shift Supervisor, NEORSO, SWTP
George Uhl, NEORSO
John Mayer, NEORSO

*Denotes those present during the November 3, 1994, exit meeting conducted at the Easterly Wastewater Treatment Plant.

*Denotes those present during the November 4, 1994, exit meeting conducted at the Southerly Wastewater Treatment Plant.

2. Background

During an April 1991 aerial monitoring survey conducted in the Cleveland, Ohio area, increased radiation levels were detected at the Northwest Ohio Regional Sewer District (NEORSO) Southerly Wastewater Treatment Plant (SWTP) located in Cuyahoga Heights, Ohio. The material involved with the increased radiation levels was subsequently determined to be cobalt-60. The SWTP services a large section of the Cleveland/Northeast Ohio area. The SWTP treatment includes incineration of sludge, transport of ash in slurry form to settlement/evaporation ponds, and eventual removal of the dried product for use as fill on the SWTP property.

During the performance of surveys in November and December 1993, a NEORSO contractor identified six areas of elevated radiation exposure levels at the Northeast Ohio Regional Sewer District Easterly Wastewater Treatment Plant (EWTP) located in Bratenahl and Cleveland, Ohio. Further analysis of two of the six areas concluded that the elevated levels were from greater than average deposits of potassium-40, a naturally occurring radionuclide. Analysis of the other four areas concluded that the elevated levels were from cobalt-60. Proceeding this survey, more extensive surveys were conducted at the EWTP by the NEORSO contractor and the NRC, resulting in the conduct of limited surface remediation on the EWTP grounds. The surveys and remediation efforts are documented in NRC Inspection Report No. 999-90003/94042(DRSS).

3. Sampling Locations and Analytical Results

On September 22, 1994, the NEORSD collected a SWTP filter cake (sludge) sample for radiological analysis. The analysis concluded that the sample contained 151 picocuries per gram (pCi/g) of cobalt-60. This prompted the NRC to conduct further sampling at the SWTP and the EWTP.

A. Sampling Locations

On November 1 through 3, 1994, sewer waste water, sludge and ash samples were collected from different areas within the SWTP and the EWTP. Table Nos. 1 through 3 of this report identify the sampling locations. Samples were collected from each of the six intake points into the SWTP and from each of the three intakes points into the EWTP. Also, samples were collected from different treatment process areas in the SWTP and the EWTP. One sample per day was collected at each location.

B. Analytical Results

Sample analysis was conducted at the Region III laboratory using the gamma spectrometry system. Table Nos. 1 through 3 of this report identify the samples' locations and analytical results. As illustrated in Table Nos. 1 through 3, no samples were identified as containing cobalt-60 above the minimum detectable levels. However, trace quantities of iodine-131 were identified in five samples collected on November 1, 1994. The iodine-131 concentrations ranged from 0.7 to 1.4 pCi/g, concentrations which are below the 10 CFR Part 20.2003, "Disposal for Release into Sanitary Sewerage" limit. (Iodine-131 limit for disposal into the sanitary sewer is a monthly average concentration no greater than 10 pCi/ml.) Therefore, we have no health and safety concern.

Also, the SWTP furnace ash samples were identified as containing trace quantities of beryllium-7, thallium-201, and radium-226. The ash samples collected from November 1 through 3, 1994, were identified as containing trace quantities of beryllium-7 ranging from 12 to 32 pCi/g, concentrations which are below the 10 CFR 20.2003 limit. (Beryllium-7 limit for disposal into the sanitary sewer is a monthly average concentration no greater than 6,000 pCi/ml.) Therefore, we have no health and safety concern. These ash samples were also identified as containing trace quantities of thallium-201 ranging from 12 to 75.7 pCi/g, and trace quantities of radium-226 ranging from 3 to 10 pCi/g. Because thallium-201 is an accelerator produced radionuclide and radium-226 is a naturally occurring radionuclide, these types of materials are regulated by the State of Ohio. A copy of this report will be provided to the Ohio Department of Health for their review.

4. Survey Locations and Results

Surveys were conducted using a Ludlum Model 19 Micro R Meter, NRC Tag No. 011021, last calibrated September 13, 1994, and a Ludlum Model 12 with attached pancake probe, NRC Tag No. 047068, last calibrated August 29, 1994. Surveys were performed in each of the areas where sampling was conducted at the SWTP and EWTP on November 1 through 3, 1994. Also, a survey was performed of the EWTP Pre-Aeration Tank area.

The survey exposure rates ranged from 4 to 14 microroentgen per hour ($\mu R/hr$) (includes background) on the surface and one meter above the sampling areas and the EWTP Pre-Aeration Tank Area. The background measurements taken at the SWTP and EWTP ranged from 4 to 10 $\mu R/hr$. The areas where the survey exposure rates were slightly higher than the background exposure rates were attributed to building brick (small quantities of naturally occurring radionuclides, such as thorium-232 and potassium-40 are common materials found in brick).

5. Exit Meeting

At the conclusion of the on-site inspection on November 3 and 4, 1994, the inspector met with those individuals identified in Section 1 of this report. A summary of the preliminary results and the forthcoming letter were discussed. The NEORS management and employees did not identify any information provided during the inspection as proprietary.

TABLE NO. 1

ANALYTICAL RESULTS FROM EASTERLY AND SOUTHERLY SAMPLING

SAMPLES COLLECTED NOVEMBER 1, 1994

LOCATION	SAM PLE #	DAY	RESULT \pm $^*2\sigma$ (pCi/g)
Sou. Lagoon A	1	11/1	Co-60 <MDA
Sou. Gravity Thickener Primary Sludge	2	11/1	Co-60 <MDA I-131 0.8 ± 0.2
Sou. Gravity Thickened Excess Activated Sludge	3	11/1	Co-60 <MDA
Sou. Gravity Belt Excess Activated Sludge	4	11/1	Co-60 <MDA
Sou. Thermal Conditioning Thickened Sludge Tank No. 1	5	11/1	Co-60 <MDA I-131 0.7 ± 0.3
Sou. Thermal Conditioning Thickened Sludge Tank No. 4	6	11/1	Co-60 <MDA
Sou. Thermal Conditioning Influent	7	11/1	Co-60 <MDA I-131 1.3 ± 0.3
Sou. Vacuum Filter Cake East Belt	8	11/1	Co-60 <MDA
Sou. Vacuum Filter Cake West Belt	9	11/1	Co-60 <MDA I-131 1.4 ± 0.3
Sou. Furnace No. 1 Ash	10	11/1	Co-60 <MDA Be-7 13.8 ± 4.0 Tl-201 75.7 ± 15.0 Ra-226 10.0 ± 3.0
Sou. Furnace No. 2 Ash	11	11/1	Co-60 <MDA Be-7 12.0 ± 4.0 Tl-201 64.0 ± 17.0 Ra-226 6.0 ± 2.0
Sou. Furnace No. 4 Ash	12	11/1	Co-60 <MDA Be-7 14.0 ± 4.0 Tl-201 58.0 ± 15.0 Ra-226 10.0 ± 2.0
Sou. Big Creek Interceptor	13	11/1	Co-60 <MDA
Sou. Southwest Interceptor	14	11/1	Co-60 <MDA
Sou. Southerly Interceptor	15	11/1	Co-60 <MDA
Sou. Mill Creek Interceptor	16	11/1	Co-60 <MDA

LOCATION	SAM PLE #	DAY	RESULT \pm 2σ (pCi/g)
Sou. Cuyahoga Interceptor	17	11/1	Co-60 <MDA
Sou. Sludge Degrit No. 2	18	11/1	Co-60 <MDA
Sou. Sludge Degrit No. 3	19	11/1	Co-60 <MDA
Sou. Easterly Sludge Line	20	11/1	Co-60 <MDA I-131 1.0 ± 0.3
Sou. Initial Grit	21	11/1	Co-60 <MDA
East. Grit Classifier	22	11/1	Co-60 <MDA
East. Easterly Inlet	23	11/1	Co-60 <MDA
East. Collinwood Inlet	24	11/1	Co-60 <MDA
East. Heights Inlet	25	11/1	Co-60 <MDA
East. Southerly Pumps	26	11/1	Co-60 <MDA
East. Pump Building-Waste Activated Sludge	27	11/1	Co-60 <MDA

*The reported uncertainty refers only to counting statistics.

¹The calculated Minimum Detectable Activity (MDA) for cobalt-60 ranged from 0.1 to 0.6 picocuries per gram for all samples collected.

TABLE NO. 2

ANALYTICAL RESULTS FROM SOUTHERLY AND EASTERLY SAMPLING

SAMPLES COLLECTED NOVEMBER 2, 1994

LOCATION	SAM PLE #	DAY	RESULT $\pm 2\sigma$ (pCi/g)
Sou. Lagoon A	1	11/2	Co-60 <MDA
Sou. Gravity Thickener Primary Sludge	3	11/2	Co-60 <MDA
Sou. Gravity Thickened Excess Activated Sludge	2	11/2	Co-60 <MDA
Sou. Gravity Belt Excess Activated Sludge	NA		Shut Down for Maintenance on this day
Sou. Thermal Conditioning Thickened Sludge Tank No. 1	4	11/2	Co-60 <MDA
Sou. Thermal Conditioning Thickened Sludge Tank No. 2	5	11/2	Co-60 <MDA
Sou. Thermal Conditioning Thickened Sludge Tank No. 4	6	11/2	Co-60 <MDA
Sou. Thermal Conditioning Influent	7	11/2	Co-60 <MDA
Sou. Vacuum Filter Cake East Belt	8	11/2	Co-60 <MDA
Sou. Vacuum Filter Cake West Belt	9	11/2	Co-60 <MDA
Sou. Furnace No. 1 Ash	10	11/2	Co-60 <MDA Be-7 18.0 ± 5.0
Sou. Furnace No. 2 Ash	11	11/2	Co-60 <MDA Be-7 20.0 ± 4.0 Ra-226 10.0 ± 2.0
Sou. Furnace No. 4 Ash	12	11/2	Co-60 <MDA Be-7 22.0 ± 4.0 Ra-226 10.0 ± 2.0
Sou. Big Creek Interceptor	20	11/2	Co-60 <MDA
Sou. Southwest Interceptor	22	11/2	Co-60 <MDA
Sou. Southerly Interceptor	21	11/2	Co-60 <MDA
Sou. Mill Creek Interceptor	23	11/2	Co-60 <MDA

LOCATION	SAM PLE #	DAY	RESULT \pm 2σ (pCi/g)
Sou. Cuyahoga Interceptor	24	11/2	Co-60 <MDA
Sou. Sludge Degrat No. 1	16	11/2	Co-60 <MDA
Sou. Sludge Degrat No. 2	17	11/2	Co-60 <MDA
Sou. Sludge Degrat No. 4	18	11/2	Co-60 <MDA
Sou. Easterly Sludge Line	19	11/2	Co-60 <MDA
Sou. Initial Grit	25	11/2	Co-60 <MDA
East. Grit Classifier	28	11/2	Co-60 <MDA
East. Easterly Inlet	13	11/2	Co-60 <MDA
East. Collinwood Inlet	15	11/2	Co-60 <MDA
East. Heights Inlet	14	11/2	Co-60 <MDA
Easterly-Southerly Pumps	26	11/2	Co-60 <MDA
East. Pump Building-Waste Activated Sludge	27	11/2	Co-60 <MDA

*The reported uncertainty refers only to counting statistics.

¹The calculated Minimum Detectable Activity (MDA) for cobalt-60 ranged from 0.1 to 0.6 picocuries per gram for all samples collected.

TABLE NO. 3
ANALYTICAL RESULTS FROM EASTERLY AND SOUTHERLY SAMPLING
SAMPLES COLLECTED NOVEMBER 3, 1994

LOCATION	SAM PLE #	DAY	RESULT \pm $^{*}2\sigma$ (pCi/g)
Sou. Lagoon A	1	11/3	Co-60 <MDA
Sou. Gravity Thickener Primary Sludge	3	11/3	Co-60 <MDA
Sou. Gravity Thickened Excess Activated Sludge	2	11/3	Co-60 <MDA
Sou. Gravity Belt Excess Activated Sludge	NA		Shut Down for Maintenance on this day
Sou. Thermal Conditioning Thickened Sludge Tank No. 1	4	11/3	Co-60 <MDA
Sou. Thermal Conditioning Thickened Sludge Tank No. 2	6	11/3	Co-60 <MDA
Sou. Thermal Conditioning Thickened Sludge Tank No. 4	5	11/3	Co-60 <MDA
Sou. Thermal Conditioning Influent	7	11/3	Co-60 <MDA
Sou. Vacuum Filter Cake East Belt	8	11/3	Co-60 <MDA
Sou. Vacuum Filter Cake West Belt	9	11/3	Co-60 <MDA
Sou. Furnace No. 1 Ash	10	11/3	Co-60 <MDA Be-7 32.0 \pm 5.0 Tl-201 12.0 \pm 5.0 Ra-226 3.0 \pm 1.0
Sou. Furnace No. 2 Ash	11	11/3	Co-60 <MDA Be-7 32.0 \pm 5.0 Tl-201 12.0 \pm 5.0 Ra-226 3.0 \pm 1.0
Sou. Furnace No. 4 Ash	12	11/3	Co-60 <MDA Be-7 32.0 \pm 5.0 Tl-201 12.0 \pm 5.0 Ra-226 3.0 \pm 1.0
Sou. Big Creek Interceptor	16	11/3	Co-60 <MDA
Sou. Southwest Interceptor	17	11/3	Co-60 <MDA

LOCATION	SAM PLE #	DAY	RESULT $\pm 2\sigma$ (pCi/g)
Sou. Southerly Interceptor	18	11/3	Co-60 <MDA
Sou. Mill Creek Interceptor	19	11/3	Co-60 <MDA
Sou. Cuyahoga Interceptor	20	11/3	Co-60 <MDA
Sou. Sludge Degrit No. 1	13	11/3	Co-60 <MDA
Sou. Sludge Degrit No. 4	14	11/3	Co-60 <MDA
Sou. Easterly Sludge Line	NA	11/3	Sample Not Obtainable - Difficulty Getting Electric Switch To Work
Sou. Initial Grit	15	11/3	Co-60 <MDA
East. Grit Classifier	26	11/3	Co-60 <MDA
East. Easterly Inlet	24	11/3	Co-60 <MDA
East. Collinwood Inlet	25	11/3	Co-60 <MDA
East. Heights Inlet	23	11/3	Co-60 <MDA
East. Southerly Pumps	21	11/3	Co-60 <MDA
East. Pump Building-Waste Activated Sludge	22	11/3	Co-60 <MDA

*The reported uncertainty refers only to counting statistics.

¹The calculated Minimum Detectable Activity (MDA) for cobalt-60 ranged from 0.1 to 0.6 picocuries per gram for all samples collected.

FAX TO:

JANE CESAR, AMS

FAX 216-466-0186

(PHONE - 4671)

• HENRY BILLINGSLEY, ARTER; HADSON

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WIL TO:

C. JONES, NMSS ✓

J. DEGIO, NMSS ✓

F. COMBS, NMSS ✓

M. STEIN, OGC ✓

S. LEWIS, OGC ✓

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D. Cesar, AMS

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*H. Billingsley
Arter & Hadley*

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PAGES : 12
RESULT : OK

L. McHanger
Cleveland

To: Cyndi Jones

From: Jack Grobe

12/21/94

Present 12/22

4 Documents FYI.

12/14 AMS → NRC Re CRL
12/15 NRC → AMS Re CRL
12/15 NRC memo Re Allegation Following
12/16 NRC → Cleveland Re Report

CRL ME W/ ANY QUESTIONS.

17
~~16~~ PAGES (INCL. COVER)

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