



Northeast Ohio Regional Sewer District

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October 18, 1996

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

Re: Proposed Discharge of Advanced Medical Systems, Inc. Tank 329

Dear Mr. Madera:

You were notified by telephone yesterday that another water storage tank at the 1020 London Road facility of Advanced Medical Systems, Inc. contains insoluble Cobalt-60. Attached please find the test data that demonstrates that Tank 329 at contains detectable components of insoluble Cobalt-60. The insolubility determination was made according to NRC-approved test methods following good sample collection, chain-of-custody and laboratory practices.

As you know, the relevant regulation, 10 CFR 20.2003, indicates that only radioactive material which is shown to be readily soluble in water or is readily dispersible biological material may be discharged. Therefore, a discharge of Tank 329 would be a violation of 10 CFR 20.2003. The NRC should therefore prohibit its discharge.

In the event that the NRC chooses not to prohibit these discharge, please give the District adequate time to pursue other avenues. Please note once again that *post facto* notification provided by NRC with respect to its determinations on its testing is inadequate notice.

Very truly yours,

Lawrence K. English
Assistant General Counsel

cc: Richard N. Connelly
Thomas E. Lenhart

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REGION III

pm: 10-18-96

4117

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OUTREACH LABORATORY

REACHING BEYOND THE STANDARD!!!

October 17, 1996

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

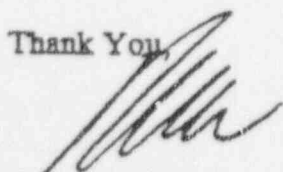
Dear Mr. Kasberg,

Outreach received three(3) samples on October 15, 1996 to be analyzed for Co-60 with an expedited turnaround time. The samples were assigned the following Laboratory Log Number 960611. At your request the samples were filtered to determine the soluble and insoluble Co-60 activity.

Two liters of each sample or volume available was filtered through a 0.45 membrane filter for the insoluble portion and two liters or volume available of the filtrate was used for the soluble portion. For sample LRW-6288-288 we used all of sample, 400 ml, which resulted in higher MDA's. If lower MDA's are required there will be an additional charge due to the long counttimes for such a small volume. The sample was analyzed using EPA Method 901.1 or other recognized methodology as specified in the report.

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. Eidson
Laboratory Director

cc: B. Koh & Associates, Inc.

OUTREACH
LABORATORY
ANALYTICAL REPORT

PROJECT NO: 980511
CLIENT: N.E.O.R.S.D.
DATE SUBMITTED: 15-Oct-95
DATE REPORTED: 17-Oct-95

Sample ID	Date	Matrix	MDA pCi/l	Cobalt-60 pCi/l
LRW-6288-286 SOLUBLE	10/14/96	Water	2.1	BDL
LRW-6288-286 INSOLUBLE	10/14/96	Solid	1.5	BDL
LRW-6288-287 SOLUBLE	10/14/96	Water	2.3	3.9 +/- 2.1
LRW-6288-287 INSOLUBLE	10/14/96	Solid	1.6	7.9 +/- 3.5
LRW-6288-288 SOLUBLE	10/14/96	Water	13.9 ¹	BDL
LRW-6288-288 INSOLUBLE	10/14/96	Solid	6.1	BDL

MDA = Minimum Detectable Activity
BDL = Below Detection Limit
1.0 Sample Volume available only 400 ml.