



DOROTHY

# Northeast Ohio Regional Sewer District

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June 28, 1995

Michael Weber  
U.S. Nuclear Regulatory Commission, Region III  
801 Warrenville Road  
Lisle, IL 60532-4351

Re: Environmental Contamination from Advanced Medical Systems

Dear Mr. Weber:

When we spoke this morning, I reminded you of the discussion we had at the June 7, 1995 meeting of the Northern Ohio Chapter of the Health Physics Society. I raised our concerns about the shortcomings of the Nuclear Regulatory Commission's approach to the contaminated piping at the Advanced Medical Systems facility. By allowing the piping to remain in the ground at the facility, the NRC is allowing the soil and groundwater to be subject to further contamination.

It is common sense that, since the contaminated piping is subject to infiltration of water from the ground and City water leakage, then that same piping would be subject to exfiltration of Cobalt-60 contaminated water. For example, as reported by AMS' Radiation Safety Officer, on Saturday, June 24, 1995, the water level in the AMS manhole rose from approximately 5" to approximately 30" in a matter of hours due to a water leak, indicating a severe infiltration problem. Had NRC inspectors been present, they could have heard water freely running through the sewer lateral into the manhole, indicating that contaminated water can freely leave the sewer lateral and manhole.

Also, as reported by AMS' Radiation Safety Officer, AMS' own engineer has stated that the waterproofing on the manhole is gone. To prevent the known Cobalt-60 contamination from spreading farther beyond the lateral and manhole, the lateral should be dug out from the facility to the London Road interceptor, and the soil itself should be remediated. Of course, as a precursor to that activity, the soil around the lateral should be extensively tested to determine the extent of present contamination. These activities should take place as soon as possible.

Please call me at (216) 641-6000 if you have any questions about the foregoing.

Sincerely,

*Richard N. Connelly*

Richard N. Connelly  
Manager, Water Quality and Industrial Surveillance

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cc: James L. Caldwell, NRC Region III

PM: 6-29-95

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