OCT 3 1 1995

Advanced Medical Systems, Inc.
ATTN: David Cesar, Vice President
121 North Eagle Street
Geneva, Ohio 44041

Dear Mr. Cesar:

We have completed our review of your June 16, 1995 letter of response to our April 17, 1995 letter, and find that we need additional information and/or clarification on several issues. Each item below is headed by the section from which it appears in our April 17 letter.

The difficulty we experienced in the initial review of your application stems from the fact that inconsistencies occur throughout your application. For example, many statements made in opening chapters contradicted, or were inconsistent with, specific ISP procedures. Also, as a general comment, you made many references to "what nuclear power plants do" in order to justify certain procedures and practices. The NRC materials program operates independently of the reactor program, and is therefore under different policy and guidelines. Please avoid making comparisons between the two programs. What may be acceptable and considered standard practice in reactor programs may not be acceptable in a materials program. Such comparisons were made in both your initial application for renewal and your June 16 letter.

As a result of discussions between AMS and NRC management, it is our understanding that you recognize the inconsistencies and problems that exist in your current application in that it does not reflect the type of program that currently exists at AMS. Therefore, you requested the opportunity to resubmit your application in its entirety. We also understand that you will incorporate the comments below into a new application. Responses to the items in this letter should be highlighted in your resubmittal to assist us in our review. If your new application is submitted before you have the opportunity to incorporate the items addressed below, please then respond to this letter through either a separate document or modifications to the new application as appropriate.

1. Item II.B.

Your response to item II.B. of our letter states that you "will take under advisement" our request that you develop an audit program per 20.1101(c). Please be advised that your radiation safety program will be inspected against Part 20, and we expect that you will audit the content and implementation of that program as required. Please also take note that with your intent to build into your program a greater amount of flexibility to make changes without amending your license, we

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will be more persistent in requiring an audit program that reviews the activities of the RSO and staff. Please take this into consideration when rewriting your application for resubmittal.

2. Item III.A.

In light of the reopening of the waste disposal site at Barnwell, we recommend that you take advantage of this opportunity and ship your waste to this site. Please keep in mind that the NRC does not consider storage as a substitute for disposal. Other than storage for decay (currently NRC only authorizes decay-in-storage for radionuclides with up to 120 day half-life), low level waste should be stored only when disposal capacity is unavailable and for no longer than is necessary. Reference IN 90-09 (enclosed).

3. Item IV.

This question is for our information only. We are interested in the development of your staff and hence, their progression to more advanced positions. Continual training of staff is often an indicator to the NRC that a licensee is committed to improving their program. Please describe your staff development program.

4. Item V.

A. Please describe the criteria that will be used to determine if ancillary personnel will be examined to determine their comprehension of training material they receive.

B. Item 4.2 is not clear. As we requested, identify the instructors who will provide training for Isotope Technicians. The statement that "a trained health physicist and other qualified instructors shall provide classroom training" is not clear. A "trained health physicist," regardless at what level, may not have the knowledge of the uniqueness of your facility or the duties of an isotope technician to provide effective training. It appears that an individual who has been an isotope technician would be a good candidate as an instructor. Provide names of trainers and their qualifications.

Item 9 of attachment B (Isotope Technician Exam) implies that the RSO or designee can authorize a RWP. Define minimum criteria for naming a designee.

5. Item VI.

A. Concerning your description of how the hot cell will be used since AMS will not be manufacturing sources, provide examples of "any activity related to source handling that can be accomplished by using the hot cell" as stated in your response to our question.

B. and C. You did not respond to these items. Rather, you referenced an inspection report in which the ventilation and exhaust systems and associated sampling systems were reviewed in detail. Inspection reports are not part of your license. Therefore, you must provide this information so that it can be reviewed from a licensing standpoint and incorporated into your license.

6. Item VII.

You must provide additional information before we can grant your request for authorization to modify and revise procedures without an amendment. You must describe the types of things you wish to modify, as well as the criteria you will follow in determining if a modification/revision can be made in-house, or if an amendment will be necessary. For example, changes to certain aspects of a survey program, bioassay procedures, core training program, etc., would require an amendment. In addition, if you wish to pursue this flexibility, we request that changes made without an amendment be reviewed and approved by the isotope committee. Please confirm our understanding that Ms. Carol Berger will be a member of that committee and provide an updated list of committee members.

A.1. Please address the second paragraph to this question concerning the hot cell manipulators.

A.2.e. Modify attachment F such that 2E4 ml/hr is changed to read 2E4 ml/min.

A.2.f. Describe what you mean by exceptional occurrence. There must be some limits set. For example, an exceptional occurrence may be when the RSO is sick, on vacation, or otherwise not physically present at the facility.

A.4. Please respond to this question. We realize that Slawinski and Weber are familiar with security of the building, but that has nothing to do with the license. Please simply describe areas where material (including waste) is stored, and security and postings that are in place.

A.6. Our interpretation of statements made on page 42 of your application was that 100 cpm above background referred to the upper limit, therefore you would be allowing a certain level of personnel contamination. Your explanation that you were referring to the lower limit of detection, and that the specified limit of 100 cpm above background equates to saying that the contamination limit is "none detected above background," is acceptable.

B. Use of the word "should" instead of "shall" makes it difficult for the NRC to conduct a meaningful and effective inspection. It severely reduces the enforceability of a license. Procedures that "should" be done, as stated in a licensee's application, are more often than not indirectly related to regulatory compliance. For those procedures which are not directly related to regulatory compliance, and you feel the word "should" is appropriate, please identify them and demonstrate why you feel each is appropriate as written. If such procedures are irrelevant to your program and have no bearing on regulatory compliance, perhaps you should consider removing them from your application.

B.1. As we requested in paragraph 2 to this item of our 4/17 letter, please include in Item 3.3.4.c. (typo in letter) of ISP-2 a commitment that surveys will be conducted at the end of each day of use of material. This is common practice in the materials (non-reactor) industry.

B.5. The word "or" as appears in your sentence is used to indicate an alternative, that is, as an alternative to performing monthly safety checks you will perform them any time there is an abnormal increase on the monitor. As noted in our April 17 letter, this alternative is not acceptable. A minimum frequency must be established. Monthly is acceptable. However, please change the grammar of your wording to remove the possibility of an alternative to the monthly check.

B.7. Please answer paragraph 2 to this question regarding calibration of flow meters used with portable air samplers.

B.8. As noted in Item VII.A.2.f. above, please address the exceptional circumstance whereby the RSO may not be present during all cell entries.

Please modify ISP-11 to make it clear that continuous air sampling be conducted when work is being done in the hot cell. The statement in 3.1.4 that an air sample "should" be taken contradicts your response to VII.B.4.

B.11. Item 3.2.3(1) was not clarified as stated in your letter. To say that "the RSO will schedule briefings and educational sessions to inform workers of ALARA program efforts when appropriate" does not provide clarification. Please re-address this question from our April 17 letter.

B.12. You did not answer paragraph no. 1 of Item VII.B.12. of our letter. Please review this item and submit your response.

B.13. Item 3.2.7(a) of ISP-21 discusses the shipment of LSA material. The shipment of LSA material requires shipping papers that must include an emergency response telephone number and an emergency response sheet. It appears that item 3.2.7(a) is not relevant to this ISP. If you do not ship LSA material, this section should be removed.

B.16. Item 2.3 of ISP-25 still references compaction of solid radioactive waste. Please delete the reference to compaction.

B.17. Please add a description of emergency procedures that will be included on a Bill of Lading for shipment of waste as we requested in question no. VII.B.17.

B.18. Please submit criteria that will be used to determine the need for radiation safety job coverage prior to a worker entering an area that requires a RWP. Your statement that determining the need for radiation safety job coverage will be based upon "sound judgement" of a RWP preparer is of concern to us.

7. Item VIII.

B.1. From your response, it is not clear that you actually contacted local authorities to determine if permits are required to store radioactive waste on-site for an extended period of time. Please contact the appropriate authorities and inform us as to their response, or confirm that this has in fact been done.

8. Item IX.C.

Describe your basis for choosing 2000 cpm as a threshold for evidence that a source may or may not be leaking. Could not a source be leaking if there were 1500 cpm? By simply accepting anything < 2000 cpm as "not leaking" you may be allowing a source to remain in use that has exceeded 0.005 microcurie.

We will continue our review of your application upon receipt of this information. Please reply in duplicate, within 30 days, and refer to Control Number 97891.

If you have any questions or require clarification on any of the information stated above, you may contact us at (708) 829-9887.

Sincerely,

Original Signed By
Kevin G. Null
Nuclear Materials Licensing Branch

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

Enclosure: IN 90-09

DOCUMENT NAME: M:\03016055.DF5
To receive a copy of this document, indicate in the box: "C" = Copy without enclosures "E" = Copy with enclosures "N" = No copy

OFFICE	DNMS/RIII		DNMS/RIII		DNMS/RIII					
NAME	KNULL:jaw	/s/	MWEBER	/s/	JMADERA	/s/				
DATE	10/31/95		10/31/95		10/31/95					

OFFICIAL RECORD COPY

Northeast Ohio Regional Sewer District

3826 Euclid Avenue • Cleveland, Ohio 44115-2504 216 • 881 • 6600 FAX: 216 • 881 • 9709

November 1, 1995

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

Re: London Road Interceptor Remediation

Dear Mr. Madera:

Thank you for your telephone call. As we had discussed, the Northeast Ohio Regional Sewer District ("District") has discussed our general requirements for confined space entry with Advanced Medical Systems, Inc. ("AMS"). As you had requested, enclosed you will find correspondence with AMS reflecting those requirements and discussions. As you can see, AMS has been apprised of our requirements for entry into our systems since December of last year. AMS has yet to comply, or to communicate that they will comply, with those requirements. If AMS has represented to you that the District has been dilatory, unresponsive, or uncooperative in this regard, you have been misinformed.

Further, as we had discussed briefly, the requirements we have discussed with AMS are for their evaluation of the extent to which they have contaminated the area around their connection to the London Road interceptor. As to the remediation itself, there is a strong feeling that neither AMS nor its contractors can be trusted sufficiently to carry out actual remediation activities. You are well aware that AMS has not demonstrated appropriate control of radioactive materials. You may also be aware that they are quite uncooperative with District employees, and can therefore not be relied upon to follow instructions therefrom. Because of the extensive contamination already caused by this licensee, we will not be put in the position of having to trust AMS to be careful in regard to District property. Accordingly, much more detailed plans would be required of AMS prior to the actual remediation of the London Road interceptor.

I hope this has answered your questions. Please call me at (216) 881-6600 if you have any further questions or comments.

Very truly yours,

Lawrence K English

Lawrence K. English
Assistant General Counsel

encl.

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REGION III

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Northeast Ohio Regional Sewer District

3826 Euclid Avenue • Cleveland, Ohio 44115-2504 216 • 881 • 6600 FAX: 216 • 881 • 9709

December 22, 1994

Henry E. Billingsley, II, Esq.
Arter & Hadden
1100 Huntington Building
925 Euclid Avenue
Cleveland, Ohio 44115-1475

Re: Northeast Ohio Regional Sewer District v. Advanced Medical Systems, Inc., et al.
Case No. 1:94 CV 2555

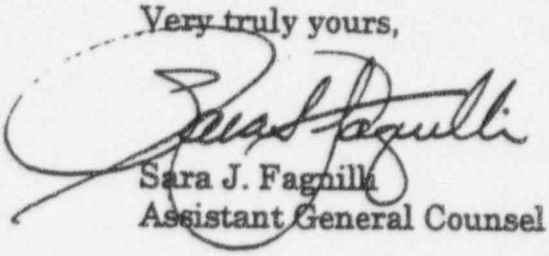
Dear Henry:

Pursuant to your request, enclosed please find a copy of the District's Confined Space Entry Program. Please let me know when you have secured someone to take the samples you requested. The District needs at least 72 hours notice for any sampling. You should also be prepared to examine the individuals for any contamination upon exiting the manhole. Given the position of the manhole you will also need to arrange for traffic control that is acceptable to the District to ensure the safety of those working in the street.

The District will have its RSO on site as well and will accompany your person into the manhole. District personnel on site will retain control of the entry, and any instructions given by them must be strictly adhered to. Air monitoring equipment must be used prior to entering the manhole to assure proper atmospheric conditions for entry. Also remember that there must be a rescue team available with individuals that have appropriate CPR/First Aid training which can be documented. Your comment to me that you and/or your client have not seen District personnel utilize air monitoring equipment must be an error in observation. District personnel do not enter manholes without first checking the atmospheric conditions.

Please contact me if you need further information. As I told you, the District would be available to obtain samples for you. The District hereby requests splits of any samples you obtain, and of course, a copy of the data generated from the sampling.

Very truly yours,



Sara J. Fagnilli
Assistant General Counsel

cc: Frank A. DiPiero, Esq.
Lawrence K. English, Esq.
Richard Cannily, WQIS
Dwight A. Miller, Esq.

Northeast Ohio Regional Sewer District
INTERNAL CORRESPONDENCE

TO Distribution

DATE July 9, 1993

FROM Erwin J. Odeal
Executive Director

SUBJECT Permit Required
Confined Space Entry
Program

As you may be already aware, on January 14, 1993 OSHA published the Permit Required Confined Spaces for General Industry, Final Rule (29 CFR 1910.146). This OSHA regulation is to be effective on April 15, 1993. The District is currently not subject to OSHA regulations, although we do strive to set standards in line with them. Recently, the Ohio Legislature passed HB308, which established the Public Employment Risk Reduction Program. It is anticipated that the program will adopt in its entirety all OSHA regulations, causing them to be applicable to the District.

Attached you will find the District's Permit Required Confined Space Entry Program. Please review the program and insure that compliance with the standards is effected by all personnel working under your authority, whom it will impact.

If you have any questions on this matter, please contact Richard Connelly of WTTS at 641-6000.

EJO:LEJ:jah
9328&218/S

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PERMIT REQUIRED CONFINED SPACE PROGRAM

INTRODUCTION

This Document (Program) contains requirements of the Northeast Ohio Regional Sewer District (NEORSD) for practices and procedures to be used to protect District employees from hazards associated with confined space entry and work. The procedures set forth are minimum procedures and are to be followed by persons entering and working in confined spaces.

The site supervisor will ensure that all provisions of the confined space entry procedure are followed with respect to District employees, and will also sign the permit signifying all conditions for entry have been met.

CONFINED SPACE

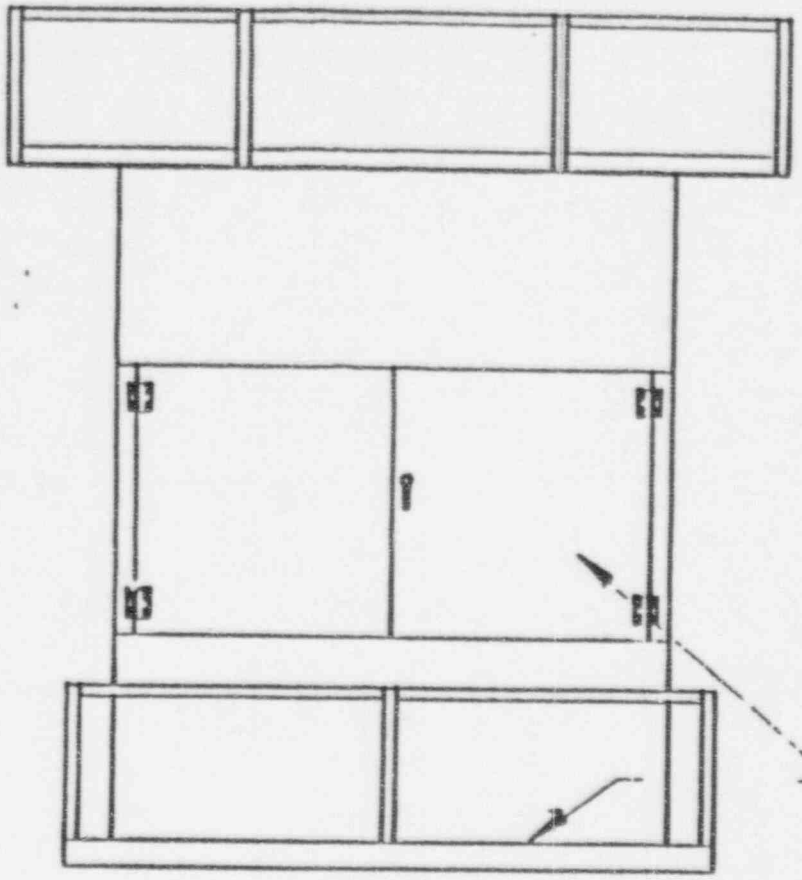
ENTRY/EXIT/RESCUE

29CFR Pt 1910

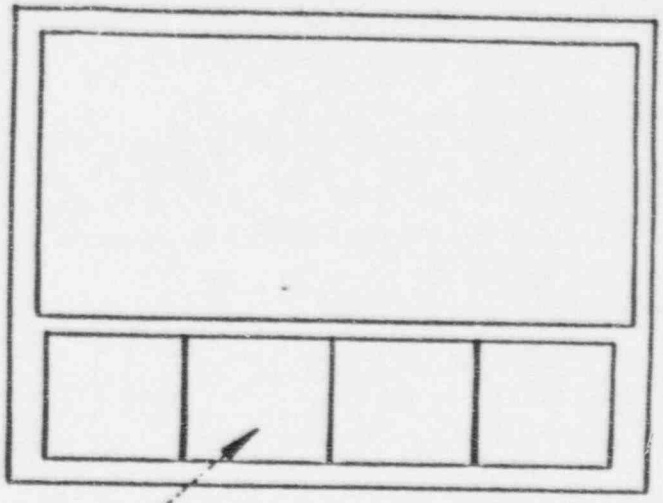
I. What is Confined Space?

A. Permit Required Confined Space means an enclosed space which:

1. Is large enough and so configured that an employee can bodily enter and perform assigned work.
2. Has limited or restricted means for entry or exit. (Some examples are aeration tanks, vessels, manholes, storage bins, hoppers, vaults, pits, and diked areas. Specific plant examples would include Zimpro reactors, boilers, incinerators.)
3. Is not designed for continuous employee occupancy.
4. Has one or more of the following characteristics:
   a. Contains or has a known potential to contain a hazardous atmosphere.
   b. Contains a material with the potential for engulfment of an entrant.
   c. Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or a floor sloping downward and tapering to a smaller cross section.
   d. Contains any other recognized serious safety or health hazards.

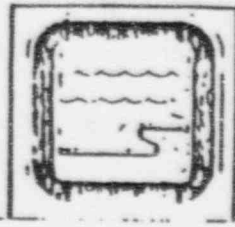


FRONT



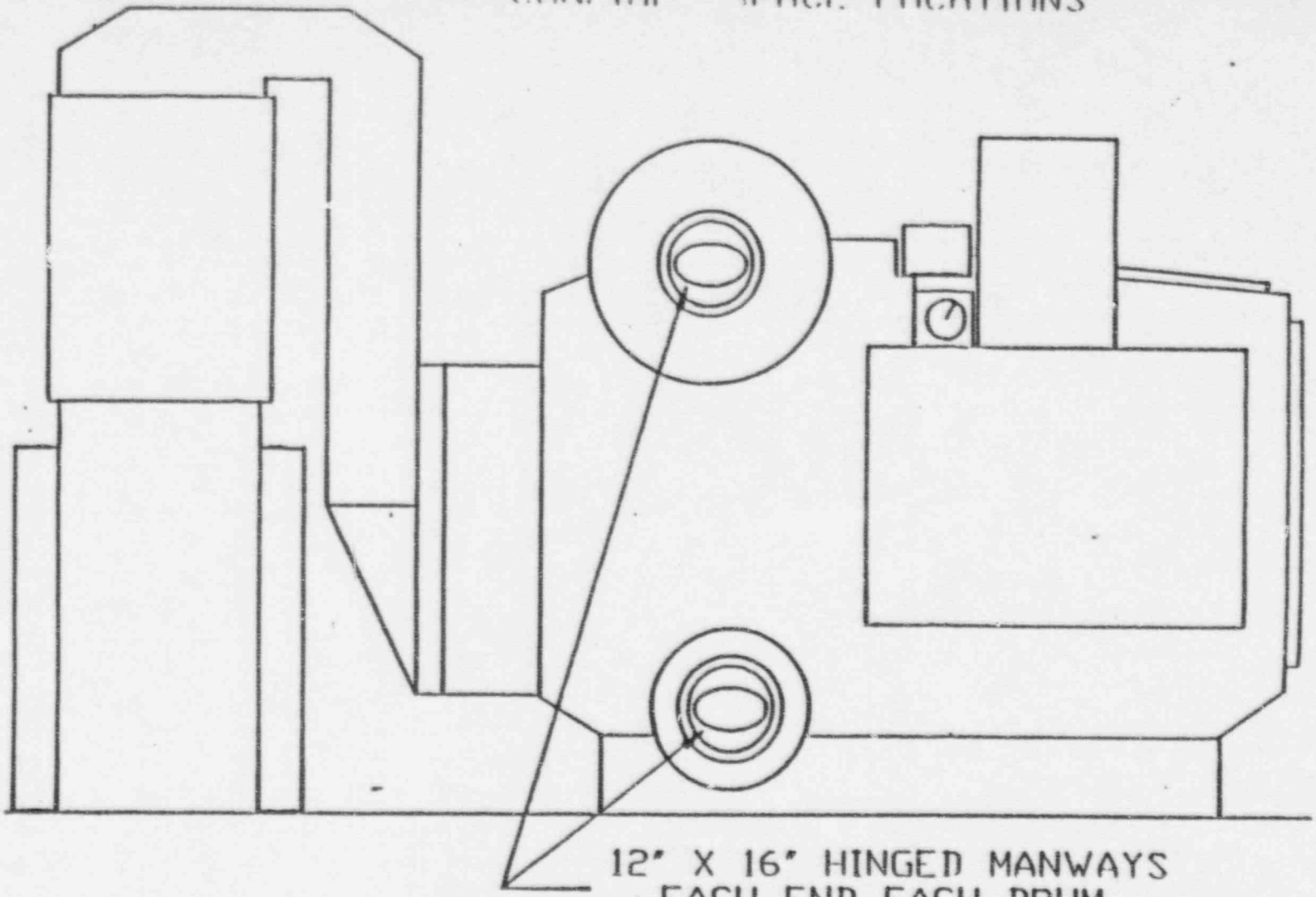
TOP

CONFINED SPACE

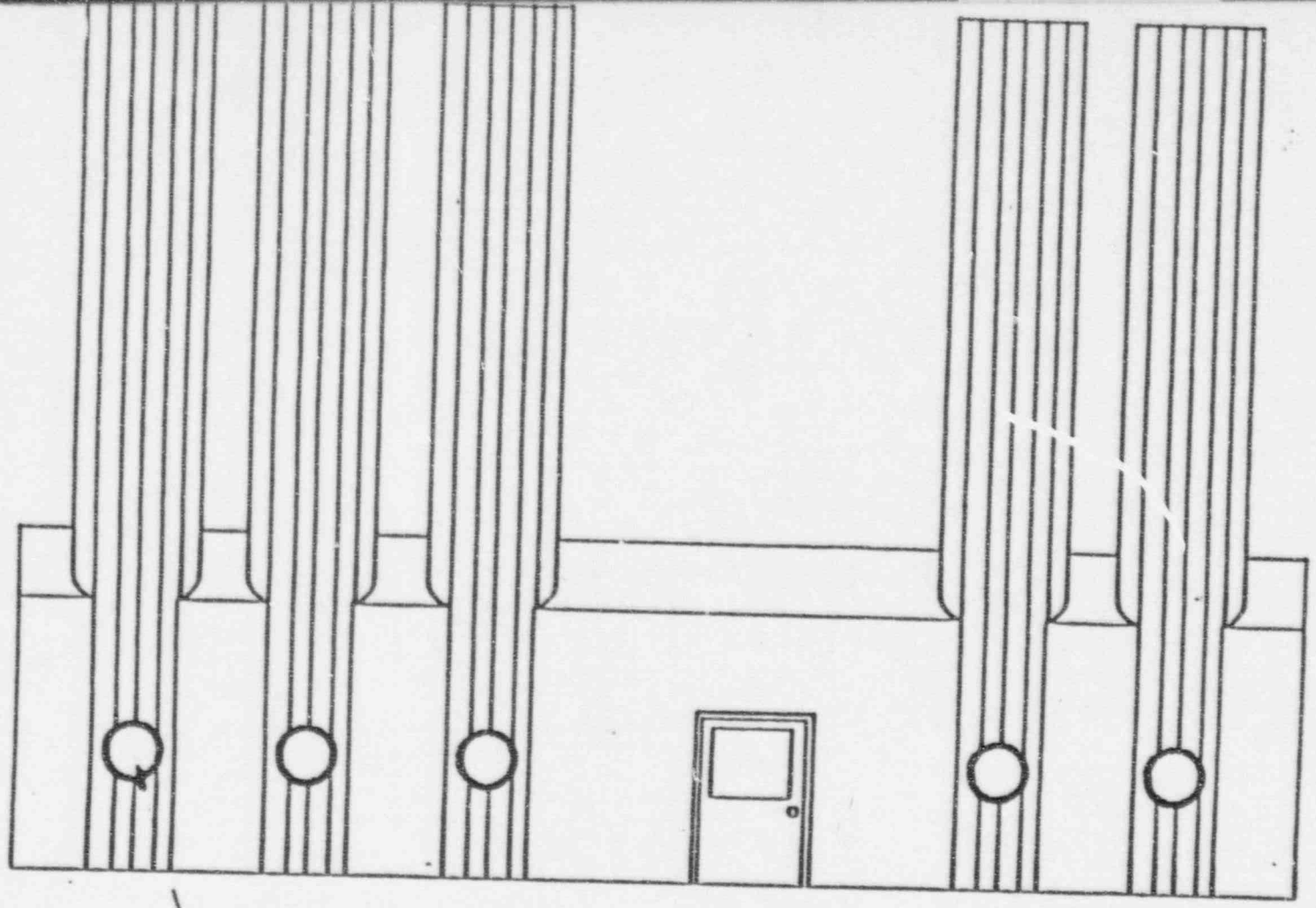


NORTHEAST OHIO REGIONAL SEWER DISTRICT	DATE: 7-7-93
TITLE: Bar Screen Confined Space	SCALE: N/A
DRN'TIY: Clayton Thomas Cox	REV. 001

CONFINED SPACE LOCATIONS



	NORTHEAST OHIO REGIONAL SEWER DISTRICT	DATE: 7-8-93
	TITLE: Roller Confined Space	SCALE: N/A
	DRN'BY: Clayton Thomas Cox	REV. 001

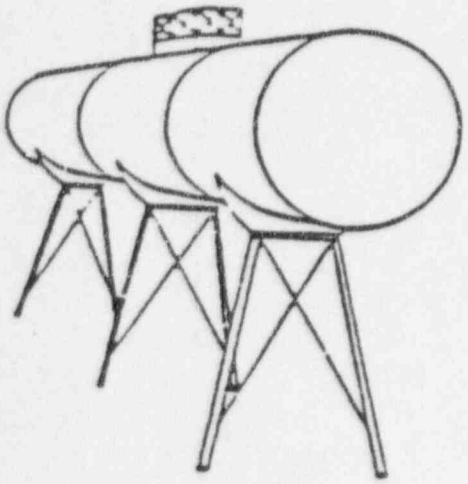


CONFINED SPACE

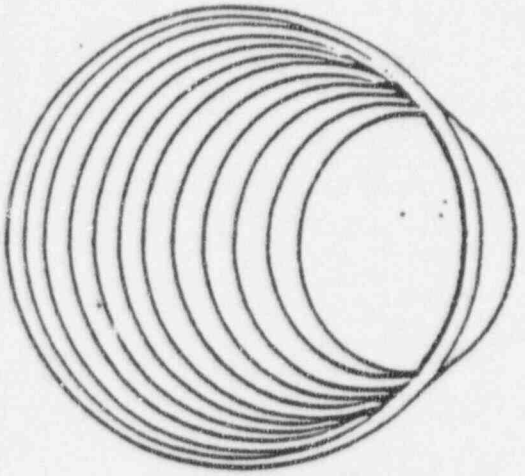
5 36" Hinged manhole covers

	NORTHEAST OHIO REGIONAL SEWER DISTRICT	DATE: 7-8-93
	TITLE: Reactor Confined Space	SCALE: N/A
	DRAWN BY: Clayton Thomas Cox	REV. 001

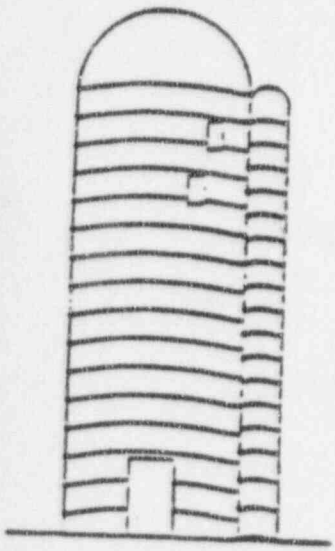
B. Examples of Confined Spaces.



Storage Tank

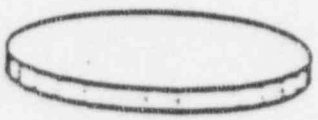


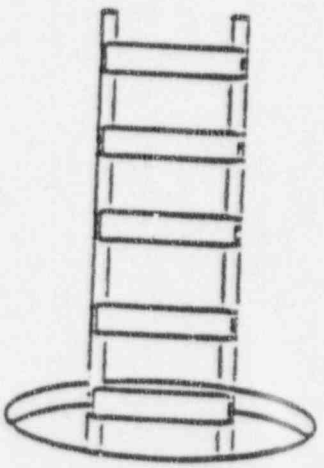
Pipeline



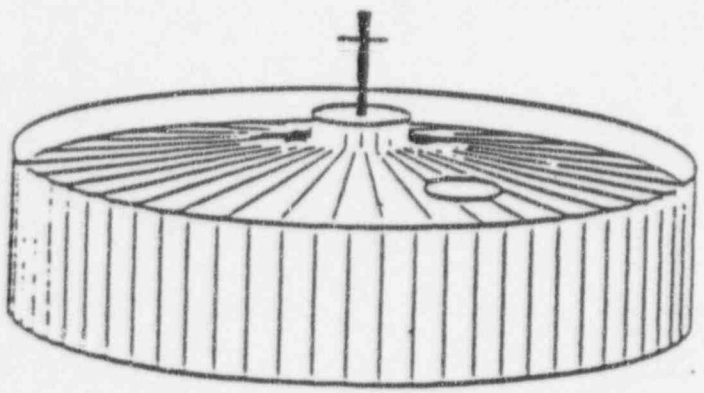
Silo

Examples of Confined Spaces





Manhole



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C. Definitions

1. Acceptable entry conditions

The conditions that must exist in a permit space to allow entry and to ensure that employees involved with a permit required confined space entry can safely enter into and work within the space.

2. Attendant (i.e. Confined Space Entry Attendant)

An individual stationed outside the permit required confined space who is trained as required by this standard.

3. Authorized entrant

An employee who is authorized by the supervisor to enter a permit required confined space.

4. Entry supervisor

The person (such as the manager, supervisor, or crew leader) responsible for determining if acceptable entry conditions are present at a permit space where entry is planned, for authorizing entry and overseeing entry operations, and for terminating entry as required by this section.

NOTE: An entry supervisor also may serve as an attendant or as an authorized entrant, as long as that person is trained and equipped as required by this section for each role he or she fills. Also, the duties of entry supervisor may be passed from one individual to another during the course of an entry operation.

5. Entry

The action by which a person passes through an opening into a permit required confined space. Entry includes ensuing work activities in that space and is considered to have occurred as soon as any part of the entrant's body breaks the plane of an opening into the space.

6. Entry Permit

Means the written document established by the District. The entry permit defines the conditions under which the permit space may be entered. (Refer to District Confined Space Permit under Section III. Permit Program)

7. Entry Permit System

The District's written procedures for preparing and issuing permits for entry into permit required confined spaces.

8. Hazardous Atmosphere

An atmosphere which exposes employees to a risk of death, incapacitation, injury, or acute illness such as:

a. A flammable gas, vapor, or mist in excess of 10% of its L.E.L. (Lower Explosive Level).

b. An airborne combustible dust at a concentration that meets or exceeds its LEL. NOTE: This concentration may be approximated as a condition in which the dust obscures vision at a distance of five (5) feet (1.52 M) or less.

c. An atmospheric oxygen concentration in the confined space below 19.5 percent or above 23.5 percent.

d. An atmospheric concentration of any substance for which a permissible exposure limit is published in Subpart 2 of 29 CFR Pt 1910 and could result in employee being exposed above the P.E.L.

e. Any atmospheric condition recognized as immediately dangerous to life or health.

9. Immediately Dangerous to Life or Health (IDLH)

a. Any condition which poses an immediate threat of loss of life, may cause irreversible severe health effects or could impair escape from the permit space.

10. Immediately Severe Health Effects

a. Any acute clinical sign(s) of a serious exposure related reaction manifested within 72 hours after exposure.

11. Non-Permit Confined Space

a. A confined space that does not contain, or with respect to atmospheric hazards have the potential to contain, any hazard capable of causing death or serious physical harm.

12. Oxygen Deficient Atmosphere

a. An atmosphere containing less than 19.5 percent oxygen.

13. Oxygen Enriched Atmosphere

a. An atmosphere containing more than 23.5 percent oxygen.

14. Retrieval Line

a. A line or rope secured at one end to the worker by a full body harness and with its other end secured to either a lifting device or to an anchor point located outside the entry portal.

II. Reason for Entering Permit Required Confined Space

A. Maintenance and Repair

B. Inspection

C. Sampling

D. Investigation

E. Other projects related to proper operation of treatment plants and/or collection system

F. Emergency Rescue

III. Permit Required Confined Space Program

A. Where required under Subpart 2 of 29 CFR 1910.146, the NEORSD shall prepare a permit(s) in a standardized format (or preprinted), through which the NEORSD identifies all parameters which must be evaluated and all conditions that must be met to ensure safe entry.

B. Persons who intend to authorize entry into a permit space shall include the following information in the checklist portion of a permit:

1. The hazards of the permit space including;

a. Chemical Hazards (hazardous atmosphere)

1) Flammable liquid - flash point below 100 degrees F. (Example gasoline)

2) Combustible liquid - flash point at or above 100 degrees F. (Example kerosene)

3) Oxygen enriched over 23.5%

4) Oxygen deficient, oxygen 19.5 or less percent. Always test for oxygen first in a hazardous atmosphere.

5) Toxic Substance - any substance that can cause acute or chronic injury to the human body, (i.e. hydrogen sulfide toxic alarm - 10 ppm).

b. Mechanical Hazards

1) Electrical shock

2) Falling objects

3) Machinery within the work place having moving parts

c. Biological

1) Bacteria/viruses

2. The measures for isolation of the permit space;

3. The measures used to remove or control potential hazards such as lockout/tagout, purging, inerting, ventilating and flushing;

4. Acceptable entry conditions, quantified with regard to the hazards identified in the permit space, which must be maintained during entry;

5. Testing and monitoring equipment and procedures by which the NEORSD will verify that acceptable environmental conditions are being met before entry and are being maintained during entry;

6. The rescue and other services which would be summoned in case of emergency and the means of communication with those services;

7. Rescue equipment to be provided on-site, if necessary.

8. The communication procedures and equipment used by authorized entrants and attendants to maintain contact;

9. The personal protective equipment, such as respirators, clothing and retrieval lines, provided in order to ensure employee safety.

10. The individual authorizing the entry shall sign or initial the permit before the entry begins, but not

until all actions and conditions necessary for safe entry into the permit space have been performed.

11. Upon completion of the entry covered by the permit, and after all entrants have exited the permit space, the individual authorizing the entry shall cancel the permit.

12. Review entry operations when the District has reason to believe that the measures taken under the permit space program may not protect employees and revise the program to correct deficiencies found to exist before subsequent entries are authorized.

13. Any other appropriate information, given the circumstances of the particular permit space.

C. Hazard Control

1. The District shall establish and implement the means, procedures, and practices by which the permit space can be entered safety. The entry supervisor will be responsible for ensuring that the following are implemented.

   a. Proper use of gas monitoring detectors.
   b. Implement lock out/tag out when necessary.
   c. Purge and ventilate when necessary.
   d. Remove of potential hazards.
   e. Ensure the proper safety equipment is worn.
   f. Explain entry/exit procedures.

D. Personnel Information

1. Signs shall be posted near permit spaces to notify all personnel that only authorized entrants may enter the permit space (i.e., "Danger - permit required confined space, do not enter).

2. By such signs and training, unauthorized personnel will be prevented from entering permitted confined space area.

E. Personnel Training

1. Personnel shall be trained so that attendants, authorized entrants, and personnel authorizing or in

charge of entry can work safely in and around the permit space (Refer to Section VI Training).

F. Equipment

1. Appropriate equipment shall be provided and maintained.
2. Proper use of equipment should be ensured.
3. Equipment generally required for permitted confined space entry may include but not be limited to the following:
   a. Monitors & Test equipment such as MSA 361 to test for LEL, oxygen, Toxics)
   b. Communication equipment when necessary
   c. Personal protective equipment
   d. Ventilating equipment needed to obtain acceptable entry conditions.
   e. Lighting equipment needed to enable employees to see well enough to work safety and to exit the space quickly in an emergency.
   f. Equipment, such as tripods/winches, mechanical advantage systems and/or ladders, needed for safe entrance and exit by authorized entrants.

G. Rescue

1. The entry supervisor will ensure that procedures and equipment necessary to rescue entrants from permit spaces are implemented and provided.
   a. It is the policy of the District to have in-plant rescue teams. [For contractor personnel see (III) (I) (5)].
   b. The rescue team shall have the necessary equipment for rescue.
   c. The rescue team shall be properly trained and training shall be ongoing. Annual training will be conducted in confined spaces to practice rescue.

H. Protection from External Hazards

1. Insure that barriers necessary to protect entrants from external hazards are provided. No unauthorized

personnel/pedestrians/vehicles may be in the permit space.

I. Duty to Other Employers

1. The District will provide contractors with all the available information on permit space hazards which the contractor needs to be aware of in order to comply with this standard.
2. Coordinate entry operations with the contractor, when both District personnel and contractor personnel will be working in or near permit spaces.
3. Debrief the contractor at the conclusion of the entry operations regarding the permit space program followed and regarding any hazards confronted or created in permit spaces during entry operations.
4. Responsibility for the health and safety of contractor personnel remains that of the contractor.
5. Although the District will assist during any emergency involving contractor personnel, the responsibility for the health and safety of such personnel remains that of the contractor.

IV. Permit System

A. Before entry is authorized, the entry supervisor will document the completion of measures required by Section III - Permit Required Confined Space Program

B. Before entry begins, the entry supervisor identified on the permit will sign the entry permit to authorize entry.

C. The completed permit will be made available at the time of entry to all authorized entrants, by posting it at the entry portal or by any other equally effective means, so that the entrants can confirm that pre-entry preparations have been completed.

D. The duration of the permit may not exceed the time required to complete the assigned task or job identified on the permit.

E. The entry supervisor will terminate entry and cancel the entry permit when:

1. The entry operations covered by the entry permit have been completed; or
2. A condition that is not allowed under the entry permit arises in or near the permit space.

F. The Superintendent or his/her designee at each facility will retain each cancelled entry permit for at least one (1) year to facilitate the review of the permit. The review will be done annually. Any problems encountered during an entry operations shall be noted on the pertinent permit so that appropriate revisions to the permit space program can be made.

V. Entry Permit

A. The individual who authorizes an entry assumes direct charge of the entry for its duration. An individual who intends to authorize entry in a permit space shall, in addition to the checklist items required in Section III, include in the permit, at a minimum the following information:

1. The identity of the permit space;
2. The purpose of the entry;
3. The date of the entry and the authorized duration;
4. A list of the authorized entrants entering confined space;
5. A list of attendants currently serving on this entry;
6. The individuals, by name, currently serving as entry supervisor, with a space for the signature or initials of the entry supervisor who originally authorized entry;
7. The hazards of the permit space to be entered;
8. The measures used to isolate the permit space and to eliminate or control permit space hazards before entry;
9. The acceptable entry conditions;
10. The results of initial and periodic tests performed, accompanied by the names or initials of the testers and by an indication of when the test was performed;
11. The rescue and emergency services that can be summoned and the means for summoning those services;

12. The communication procedures used by attendants and authorized entrants to maintain contact during the entry;

13. The equipment to be provided and used during confined space entry and exit; and

14. Any other information to insure employee safety.

VI. Training

A. It is the policy of the District that training will be provided so that all employees whose work is regulated by this section, acquire the understanding, knowledge and skills necessary for the safe performance while working in confined spaces.

B. Training will be provided to each affected employee:

1. Before the employee is first assigned duties to enter confined spaces;

2. Before there is a change in assigned duties in regards to confine space operations;

3. Whenever there is a change in permit space operations that presents a hazard about which an employee has not previously been trained;

4. Whenever the District has reason to believe that there are deviations from the permit space entry operations required under the Permit Required Space Program - III, or that there are inadequacies in the employee's knowledge of equipment or procedure.

C. The training will establish employee proficiency in the duties required for confined space operations.

D. It is the policy of the District that each respective department certify that training required for confined space procedures has been accomplished. The certification will contain each employee's name, the signature or initials of the trainers, and the dates of training. The certification will be available for inspection by the employee and the authorized representative.

E. Any non-employee shall receive training equivalent to that described in this Section VI prior to entry.

VII. Training and Duties of Authorized Entrants

A. Hazard Recognition: It is the policy of the District that authorized entrants:

1. Know the hazards which may be faced during entry (Refer to III Permit Program).
2. Recognize the signs and symptoms of exposure to a hazard. Example - chemical exposure - burning of eyes or skin, physical exposure - oxygen deficiency, impaired judgment, rapid fatigue.
3. Understand the consequences of exposure to a hazard. Example - shortage of oxygen can cause brain damage or even death.

B. Communication: It is the policy of the District that the authorized entrants:

1. Maintain contact with attendant and alert the attendant whenever;
   a. The entrant recognizes any warning sign or symptom of exposure to a dangerous situation; or
   b. The entrant detects a prohibited condition.
2. Notify the attendant when the entrants self initiate evacuation of a permit space.

C. Protective Equipment: It is the policy of the District that authorized entrants:

1. Are aware of the personal protective equipment needed for safe entry and exit:
   - entry/exit system
   - respirators/SCBA's
   - protective clothing
2. Are provided with and use the personal protective equipment <u>properly</u>.
3. Are aware of external barriers needed to protect entrants from external hazards and the proper use of those barriers. Example - barricades to protect entrants from unauthorized personnel entering the permit space.

D. Self-Rescue: It is the policy of the District that the authorized entrant exit the permit space, unless it is physically impossible to do so, when:

1. The attendant or entrance supervisor orders evacuation.
2. An automatic alarm is activated.
3. The authorized entrants perceive they are in danger and/or detect a prohibited condition.

VIII. Training and Duties of Attendant

A. It is the policy of the District that an attendant is stationed and remains outside the permit space(s) at all times during entry operation.

B. Individuals who work as attendants shall receive the appropriate training. (Refer to III Permit Program.)

C. Individuals who work as attendants shall perform their duties under the entry permit system.

1. Number of entrants. The entry supervisor shall ensure that attendants continuously maintain an accurate count of all persons in the space.

2. Hazard Recognition. The entry supervisor shall ensure the attendants know of and can recognize potential permit space hazards, monitor activities inside and outside the permit space to determine if it is safe for entrants to remain in the space.

3. Communication. The entry supervisor shall ensure that attendants:

a. Maintain effective and continuous contact with authorized entrants during entry.

b. Order authorized entrants to evacuate the permit space immediately, when:

1) The attendant observes a condition which is not allowed in entry permit.

2) The attendant detects behavioral effects of hazard exposure.

3) The attendant detects a situation outside the space which could endanger the entrants.

4) The attendant detects an uncontrolled hazard within the permit space.

5) The attendant must leave the work station or perform duties that might interfere with the attendants primary duty to monitor and protect entrant.

6) The attendant observes any other situation that in the attendant's judgment warrants evacuation.

c) Attendant must summon rescue and other emergency services as soon as the attendant determines that the authorized entrants need to escape from permit space hazards.

d) Attendant must take the following actions as necessary, when unauthorized persons approach or enter a permit space while entry is underway.

1) Warn the unauthorized persons away from the space.

2) Request the unauthorized persons to exit immediately if they have entered the permit space.

3) Inform the authorized entrants and any other designated persons if unauthorized persons have entered the permit space.

4. Rescue - The entry supervisor shall ensure that attendants:

a) Do not enter the permit space to attempt rescue of entrants.

b) Properly use any rescue equipment provided for their use and perform any other assigned rescue and emergency duties, without entering permit space.

c) Enter confined space only if he/she has been trained in confined space rescue and if another attendant is present for back up.

IX. Training and Duties of the Individual Authorizing or in Charge of Entry

A. It is the policy of the District to ensure that individuals authorizing or in charge of entry shall receive the appropriate training. (Refer to III Permit Program.)

B. Entry authorization and supervision. Individuals authorizing or in charge of entry shall:

1. Determine that the entry permit contains the required information before or authorizing or allowing entry.
2. Determine that the necessary procedures, practices and equipment are in effect before allowing entry.
3. Determine at appropriate intervals, that entry operations remain consistent with the terms of the entry permit, and that the acceptable entry conditions are present.
4. Take the necessary steps for concluding an entry operation, such as closing off a permit space and cancelling the permit once the work authorized by the permit has been completed.
5. Also serve as authorized entrants or attendants for an entry if they have the proper training.
6. Verify that rescue services are available and the means for summoning them are operable, prior to entry.
7. Shall take the appropriate measures to remove unauthorized personnel who are in or near permit spaces.
8. Determine whenever responsibility for a permit space entry operation is transferred and at intervals dictated by the hazards and operations performed within the rpace, that entry operations remain consistent with terms of the entry permit and that acceptable entry conditions are maintained.

CONFINED SPACE

ENTRY PROCEDURES

I. Training Requirements

A. Personnel Training (Entrants/Support Personnel)

1. Entry/Exit Procedures (Annual Review)
2. Use of Applicable Respirator, SCBA and Exit Capsule (Annual)
3. Lockout/Tagout Procedures (With Annual Review)
4. Use of Safety Equipment (Ongoing)

B. Personnel Training (Rescue Team)

1. Use of SCBA (Twice per year)
2. Rescue Training (Once per year)
3. CPR/First Aid (Annual/Every Three Years)
4. Use of Safety Equipment (Ongoing)

II. Wastewater Treatment Facilities

A. Preliminary Planning Session (Supervisor, Entry Team and Rescue Team)

1. Review nature of entry location
2. Review work to be completed
3. Review personnel requirements
4. Preliminary Hazard Assessment
   a) Review list of chemicals vented to, stored, or to be used in confined workspace during operation (Utilize MSDS for respective hazard review for each, if any)
   b) Review equipment needs based on hazard potential
5. Review entry methodology
6. Review entry permit requirements

B. Entry Permit Application/Worksheet

1. Hazard Evaluation

   a) Atmospheric testing. Continuous monitoring for oxygen concentration, L.E.L. conditions and toxic gas concentrations.

   b) Mechanical hazards

   c) Electrical hazards

   d) Miscellaneous conditions

2. Hazard Remediation

   a) Ventilation

   b) Respirator/SCBA usage

   c) Lockout/Tagout

3. Equipment Requirements

   a) Safety and personnel protection equipment

   b) Operational equipment

4. Personnel Requirements

   a) Designate entry personnel

   b) Designate support personnel (topside or outside attendant(s))

   c) Designate rescue team

   d) Communication System/Method

C. Permit Application Review by Authorizing Supervisor

1. Review of Hazard Evaluation

2. Review of Hazard Remediation

3. Review of Equipment Requirements

4. Review of Personnel Requirements

   a) Verification of Entry Training for entry and support personnel

   b) Verification of Rescue Training for designated rescue team

   c) Verification of appropriate communication system/method

5. Permit Authorization Granted or Denied

D. Lockout/Tagout (When Applicable)

1. Lockout of electrical sources/devices

2. Lockout of mechanical devices

3. Blind flanging of pipes

E. Secure the Work Site (Exclusion Zone)

1. Only those personnel involved in confined space entry to be in exclusion zone
2. Barricade as necessary to insure safety of all concerned (but maintain appropriate fire exits)
3. No smoking in exclusion zone

F. Continuous Atmospheric Monitoring

1. Outside/topside monitoring with appropriate metering device, when applicable
2. Self monitoring by entrant(s) with a meter which at a minimum measures for oxygen content, L.E.L. conditions, and hydrogen sulfide.
3. Use of additional monitoring devices if called for (i.e. draeger tubes).

G. Entry Into Confined Space

1. Utilize Predetermined Entry Method (see Appendix A for specific use requirements for vertical entry)
   a) Tripod/Mechanical with harness and lifeline. (Vertical entry only)
   b) CSEEM (Vertical entry only)
   c) Multiple Attendant Assisted with harness and lifeline
2. Perform Tasks as Authorized by Permit
3. Continuous communication capability with entrant(s) established.
4. Continuous communication capability with Rescue Team established (when different from topside attendants).

H. Exit From Confined Space

1. Utilize Planned Exit Method
   a) Self Exit
   b) Tripod/Mechanical (Vertical Exit only)
   c) CSEEM (Vertical Exit only)
   d) Multiple Attendant
2. Close Entry Portal
3. Clear Equipment From Work Site

I. Emergency Exit

1. Rescue Team Contacted. No Entry For Rescue Except by Properly Trained and Equipped Rescue Team.
2. Exit Methodology
   a) Self Rescue
   b) Tripod/Mechanical (Vertical Only)
   c) CSEEM (Vertical Only)
   d) Multiple Attendant Retrieval
   e) Rescue Team Enters to Retrieve. (Only when rescue from outside space cannot be accomplished)
      1) Equipment utilized appropriate to hazard condition (protective clothing, SCBA, etc)
      2) Appropriate Entry/Exit Methodology
3. Care for Evacuated Entrant
   a) First Aid/CPR (if required)
   b) EMS (if required)
4. Document Emergency Exit Condition
   a) Authorizing Supervisor to Investigate
   b) Appropriate Accident/Incident Report completed by Supervisor

III. Collection Systems Facilities/Pre-Permitted Locations (WQIS, SMC, Pump Stations)

A. Secure the Work Site
   1. Traffic control set up
   2. Exclusion zone determined
   3. No smoking in exclusion zone

B. Prepare Confined Space Entry Log (All manholes entered by District personnel are permit required confined spaces.)

C. Lockout/Tagout (When applicable)
   1. Lockout of electrical sources
   2. Lockout of mechanical devices
   3. Blind flanging of pipes

D. Atmospheric Monitoring
   1. Monitor atmosphere before opening manhole whenever possible

2. Monitor top, middle, and bottom of space prior to entry
   a) Monitor for L.E.L., oxygen concentration, H_2S/CO/toxics
   b) Record readings on entry log form
3. Continuous monitoring during entry
   a) Topside monitoring with appropriate device
   b) Self monitoring (tritector)
   c) Additional monitoring with draeger tubes etc. when needed

E. Miscellaneous Hazard Review
1. Inspect entry location for other hazards
   a) Slippery conditions (snow, ice, rain etc.)
   b) Bad rungs/no rungs etc.
   c) High flow/high velocities
   d) Other
   e) Document hazards on confined space entry log form

F. Hazard Remediation
1. Corrective action for hazards (i.e., ventilation etc.)
2. Document corrective action on confined space entry log form

G. All Required Equipment on Hand and Secured

H. Entry Into Confined Space
1. Utilize entry method appropriate to site (See Appendix A for specific use requirements for vertical entry)
   a) Tripod/mechanical
   b) CSEEM
   c) Attendant assisted with harness and lifeline
2. Perform assigned task(s)
3. Continuous communication with entrant established

I. Exit From Confined Space
1. Utilize planned Exit method
   a) Self-Exit
   b) Tripod/mechanical
   c) CSEEM
   d) Attendant assisted
2. Close manhole/entry portal
3. Clear work site

J. Emergency Exit

1. Declare emergency to clear radio communication.
2. Notify Base of emergency exit status (contact WQIS if applicable)
3. Exit Methodology
   a) Self-Rescue
   b) Tripod/Mechanical
   c) CSEEM
   d) Attendant assisted retrieval
   e) Rescue Team enters to retrieve
      1) equipment utilized appropriate to hazard condition
      2) appropriate entry/exit methodology
4. Care for Evacuated Entrant
   a) First Aid/CPR
   b) EMS (Notification via Base)
   c) Transport to care
5. Document Emergency Exit Condition
   a) Supervisor to investigate immediately
   b) Appropriate accident/incident report completed by supervisor

APPENDIX A

CONFINED SPACE ENTRY PERMIT PROGRAM

Manhole/Vertical Entry Requirements for Fall Arrest/Retrieval Devices

Note: Fall Arrest/Retrieval Devices Include:
...DBI/SALA System (Winch & Tripod)
...CSEEM (Mechanical Advantage)
...Rollgliss (Mechanical Advantage & Tripod)

Condition	Requirement
Bad rungs or no rungs, under all topside conditions	Fall arrest/retrieval system required
Good rungs, one person topside, 5' or less depth	Manual assist. Fall arrest/ retrieval system optional
Good rungs, one person topside, greater than 5' depth	Fall arrest/retrieval system required
Good rungs, two or more persons topside, 15-20'* or less depth	Manual assist. Fall arrest/ retrieval system optional
Good rungs, two or more persons topside, greater than 15-20'* depth	Fall arrest/retrieval system required
High flow conditions, all depths, under all topside conditions	Fall Arrest/retrieval system required
Rescue situation, all depths	Fall arrest/retrieval system required

*All manual assist entries assume the optimum use of personnel available at the scene. Less than optimum conditions or use of personnel would call for the use of fall arrest/retrieval system option.

PART 3

PERSONAL PROTECTION GEAR AND EQUIPMENT TO BE UTILIZED

	Yes/No	Type/Comment	Reviewed with Entry Team
Respirators			
Self Contained Breathing Apparatus			
Protective Clothing/Gloves			
Protective Helmets			
Eye Protection			
Foot Protection			
Life Lines and Harness			
Mechanically Assisted Entry Equip.			
Lighting			
Communication Equipment			
Ventilation Equipment			
Fire Equipment			
Warning Signs Posted			
Monitoring Equipment			

Remarks: _____

PART 4

Authorized Entrant	Department	Trained
Name _____	_____	Y N
Name _____	_____	Y N

Attendant	Department	Trained
Name _____	_____	Y N
Name _____	_____	Y N

Rescue Team _____ Dept.		CPR/ Trained	First Aid
Name _____	_____	Y N	Y N
Name _____	_____	Y N	Y N
Name _____	_____	Y N	Y N
Name _____	_____	Y N	Y N

Crew Leader _____ Dept.		CPR/ Trained	First Aid
Name _____	_____	Y N	Y N
Name _____	_____	Y N	Y N

Special entry and/or work procedures _____

I certify that all requirements of this Confined Space Entry Permit have been met.

CONFINED SPACE ENTRY PERMIT APPLICATION

PART 1

Location of confined space _____

Purpose for entering space _____

Chemicals to be used (described fully) _____

_____

MSDS available and reviewed?: Yes N/A No _____

Previous contents of space: _____

Expected entry date _____ Expected entry time _____

Outside contractors (name) _____ Training given Y __ N __

By District

PART 2

Hazard Evaluation of the Confined Space. Write yes or no. If the hazard does not apply write N/A (not applicable)

Date _____

____Corrosive Materials

____Hot Equipment (Welding)

____Flammable Materials

____Toxic Materials

____Inert Gases

____Cleaning (i.e., chemical scrapping, water, etc.)

____Spark producing operations

____Liquids (Engulfment Potential)

____Drains open

____Pressure systems

____Mechanical (augers, moving parts, etc.)

____Electrical Wires or Equipment

ISOLATION CHECKLIST

Lines to vessel blanked or disconnected (yes or no)

____ Liquids

____ Electri

Mechanical

INITIAL ATMOSPHERIC TESTS

	Concentration		
	Top	Middle	Bottom
Oxygen Content - (Percent) (Limit 19.5% - 23.5%)			
Explosibility (Percent of LEL) (Limit less than 10%)			
Toxic Contaminant PPM			

How Tested? _____

Other _____

Remarks: _____

_____

Type of instrument(s) used _____ Last calibrated on _____

Time of reading: _____ Date _____

Atmospheric Tests performed by _____

(Signature)

Description of Hazard/Remediation

_____

_____

_____

_____

_____

_____

_____

Initial tests and Hazard Evalution performed by:

INTERNATIONAL TECHNOLOGY CORPORATION

Sampling Procedure for Collection of Samples for Integrated Environmental Management Site, Microbial Conversion of ^{60}Cobalt

1.0 Requirements

- Avoid contamination of sampling equipment, sample containers and the sample.
- Document sample chain-of-custody from sample collection through analysis and disposal.
- Clearly reference each sample with chain-of-custody documentation using labels and unique sample numbers.

2.0 Procedure

2.1 Do not allow sampling equipment to touch the ground, personnel, or the sample until the sample is collected. Do not touch the end of the sampling equipment meant to pickup the sample.

2.2 Cover the working area at the sampling location with plastic sheeting to avoid spreading contamination.

2.3 Wear a new pair of disposable gloves for each sample to avoid cross contamination between samples.

2.4 Do not touch the inside of the lid or around the mouth of the sterile sample container.

2.5 Do not place lids on the ground while collecting the sample.

2.6 For water samples, fill the bottle about half full with the sample, screw on the lid, shake, and dispose of properly. Then fill the rinsed bottle with sample leaving about 1 inch of headspace and cap tightly.

2.7 When collecting a sludge sample use a fresh, sterile spatula for each sample. Cap the sample container tightly.

2.8 Collect the samples in the sterile glass jars provided.

2.8.1 Collect three (3) 250 mL samples of sludge using the sterile 250 mL widemouth sample jars.

2.8.2 Collect three (3) sludge samples in the 40 mL VOA vials.

Regional Office
312 Directors Drive • Knoxville, Tennessee 37923 • 615-690-3211

2.8.3 Collect three (3) sewer water samples in the 40 mL VOA vials.

2.9 Each sample must be labeled with a unique sample number. The label should also identify the sampling site, date, project, and project number (if available).

2.10 After the sample containers are sealed tightly, further seal the jars by wrapping tape around the lid. Place each sample container in a separate "zip-lock" bag.

2.11 Samples should be shipped, with blue ice packs or wet ice packed in ziplock bags, via overnight courier to the appropriate laboratory.

Ship six (6) 40 mL VOA vials to:

IT Corporation
Technology Development Lab.
304 Directors Drive
Knoxville, TN 37923
Attn: Chuck Brewer and Duane Graves

Ship three (3) 250 mL wide mouth jars to:

PACE Laboratory
5930 McIntyre Street
Golden, CO 80403
Attn: Laurie Pacheco and Bob Shannon

(1) Ship all samples to IT

2.12 Do not freeze microbiological samples. Do not use dry ice.

~~Do not Ship on Friday~~
~~to not arrive~~

(2) Do not Ship on a Friday. Samples must go out on collection day & be received next AM.

Roland Lickus
OH-6C

COUNTY OF CUYAHOGA

Cuyahoga Emergency Management Assistance Center (CEMAC)

Commissioners
Mary O. Boyle
Timothy F. Hagan
Lee C. Weingart

November 1, 1995

Robert Meschter, RSO
Advanced Medical Systems, Inc.
1020 London Rd.
Cleveland, Ohio 44110

Dear Mr. Meschter:

The Northeast Ohio Regional Sewer District ("NEORSD") is a member of the Cuyahoga County Local Emergency Planning Committee ("LEPC"), because it is a first responder for emergencies involving discharges of hazardous substances to sewers and public water courses within the District's drainage area. NEORSD staff members are well trained emergency responders and provide invaluable on-scene guidance and assistance to Fire, Police, EMS, County Health Department, Ohio EPA, Ohio EMA, NRC, County Emergency Management and other officials during emergency incidents.

The NEORSD is also on the LEPC's 24-hour call list for spills involving sewers or public water courses, because its emergency responders are prepared and have responded to hundreds of local emergency incidents.

In your September 22, 1995 letter to Richard Connelly of the NEORSD, regarding your Emergency Plan, you said that the "NEORSD is not an emergency responder to emergencies at AMS." The NEORSD not only could respond, but has responded to emergencies at AMS. Since you were apparently misinformed about the NEORSD's emergency response role, the LEPC thought it important to set the record straight. The NEORSD could most definitely be involved in an emergency response at Advanced Medical Systems, Inc., notwithstanding your comments to the contrary.

Emergency response participation is a responsibility of local government officials. Furthermore, emergency incidents, not AMS, determine the level of response and the participants necessary for effective emergency mitigation. An emergency plan is an effort to identify possible levels of

E/105

response and the responders needed to meet these anticipated needs. We believe it is in your best interest to cooperate with any and all interested emergency response organizations, and to make your emergency plan compatible with their response protocols.

Sincerely,

Michael S. Kalstrom

Michael S. Kalstrom
Secretary, Cuyahoga County LEPC

cc: Reggie Brown, Ohio EPA
James Caldwell
Richard Connelly, NEORSD
Martha McCorkle
Edmund M. Mecklenburg
Edwin C. Price
Chief Thomas Root, Cleveland Fire Department
Ken Schultz, Ohio SERC

11/8/95

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

FAXED FROM THE
DIVISION OF WASTE MANAGEMENT
(DWM/NMSS)

FAX NUMBER: (301) 415-5398 VERIFICATION: (301) 415-7445
FAX LOCATION: TWFN 7F-19
LOCAL: ____ LONG DISTANCE: X

* * * * * * * * * * * *

1. Mike Weber, RIII FAX #: 708/515-1259
LOCATION: _____ VERIFY: _____

2. _____ _____ FAX #: _____
LOCATION: _____ VERIFY: _____

* * * * * * * * * * * *

NUMBER OF PAGES 4 PLUS COVER SHEET

FROM: Bob Stewart E1106

PHONE: 301/415-6713 MAIL STOP: T-7C6

NEFF & ASSOCIATES
PLANNERS • ENGINEERS • SURVEYORS

September 22, 1995

Engineers Opinion Report
Structural Adequacy of Building
1020 London Road
City of Cleveland
Cuyahoga County, Ohio

In the month of September an evaluation inspection of the Advanced Medical Systems facility located at 1020 London Road in Cleveland, Ohio was conducted by me in the company of Daniel J. Neff, P.E. (Registration #50573) to determine the structural adequacy of the this building to withstand earthquake and tornado damage to certain elements of the structure. This investigation was conducted under procedures described in ACI 364.1 R-94 "Guide for Evaluation of Concrete Structures Prior to Rehabilitation". Other reports reviewed were ACI 437 R-91 and ACI 201.1 R-92 and found to be valuable in content but not pertinent to the investigation being conducted for this report.

The investigator holds a bachelors degree in Civil and Structural engineering from Fenn College in 1953, is registered in the State of Ohio as a professional engineer, Cert. No. 26044 and professional surveyor, Cert. No. 4533 and as an OBBC Class 2 Plans

examiner, Cert. No. 262 all in good standing and forty two years general practice in the fields of engineering and surveying. To arrive at my conclusions as to structural adequacy I have relied on plans, field observations, discussion with personnel at the facility, field measurements and visual inspection of the various types of construction utilized for the units under investigation. Photographs of these units were taken on 15 September 1995 during my latest inspection of the facility and attached hereto.

The specific units under investigation are listed below:

1. Hot Cell
2. Isotope Shop
3. Source Garden
4. Decontamination Room
5. High Level Waste Storage
6. Clean Equipment Room
7. HEPA Equipment Room
8. Back Basement
9. WHUT Room
10. Front Basement
11. Air Lock
12. Isotope Shop Warehouse
13. Low Level Waste Storage
14. Former Chemistry Lab
15. Hot Cell Control

The structure at 1020 London Road, under Ohio Basic Building Code,

is a Noncombustible, Type 2, protected building. This structure is primarily structural steel frame with masonry walls subdivided by demising walls according to code for its use group which was probably factory and industrial use but now used primarily for storage. The foundation is founded in hardpan shale. Within this structure several areas are designed to contain radioactive materials. These areas are contained within reinforced concrete floors, walls and ceilings ranging from three feet to five and a half feet thick. This construction can be likened to a bunker or pillbox used by the military to house explosives or protect emplacements. In the period of 1934 to 1991 records indicate there have been seven earthquakes in this region ranging from 1.9 to 5.2 on the Richter Scale, the most recent occurring on 26 January 1991 at 3.5 on the Richter Scale. Minimal distress to this structure was observed at the time of my visit which could be attributed to the quake events.

It is my opinion based on reasonable scientific certainty that the structure located at 1020 London Road, Cleveland, Ohio has the structural integrity to withstand seismic forces as great as 5.2 Richter. It is my opinion that a seismic event greater than 5.2 Richter in this region is highly improbable. It is also my opinion that this facility is in a Group 1 seismic hazard exposure.

I have been asked to opine on the ability of this structure to withstand a tornado event. It is reasonable to state that it is scientifically certain that a tornado passing over this facility

would impose significant structural damage thereto. It is also reasonable to state that portion of the building contained within the bunker type construction previously alluded to would not sustain any appreciable distress. It is my opinion that in the event a tornado were to pass over this facility the bunker type construction would not be compromised. It is reasonable to compare this type of construction to the "cyclone cellars" used throughout the midwest region which are not nearly as sturdy as the subject in question.

The areas containing "high level waste storage" are located in the bunker type construction with the exception of the "source garden" which is located in the basement area with access from the first floor. Surrounding walls are reinforced concrete with sand shielding around the source. These areas in my opinion based on reasonable scientific certainty will not be compromised should an earthquake magnitude 5.2 Richter or higher be epicentered in the general geographic area or if a tornado were to pass over this structure an event which to my knowledge has not occurred in this century.

John W Denega PE P.S.

File No. 10459.006

Northeast Ohio Regional Sewer District

3826 Euclid Avenue • Cleveland, Ohio 44115-2504 216 • 881 • 6600 FAX: 216 • 881 • 9709

November 13, 1995

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

Re: Failure of AMS to Immobilize Footer Contamination

Dear Mr. Madera:

Attached please find a copy of an October 17, 1995 letter we recently received regarding the intention of Advanced Medical Systems, Inc. ("AMS") to forego grouting of the 4" footer drains that contain water that is known to be potentially contaminated to a level of 11,200 picoCuries/liter.

To leave them in this improperly abandoned condition obviously leaves open the probability of migration of contaminated water and particulates trapped therein into the ground surrounding the facility. This improper abandonment could also lead to contamination of the newly installed footers and/or further contamination of the public sewer system serving the London Road area.

AMS' stated reasons for abdicating their responsibility to prevent the spread of contamination are spurious. The materials handling and delivery of liquid grouting are handled by professionals, rather than AMS personnel, hence do not pose a hazard thereto.

Further, while it is not as inexpensive as plain cement, the liquid grouting originally promised is not a significant cost when compared against the certainty of gravity-driven contaminated water and particulates presently stored in porous footer drains leaching into the environment. If the cost of such grouting is prohibitive to AMS, this fact should certainly be conveyed to those individuals at the Nuclear Regulatory Commission responsible for assessing the adequacy of financial assurances for decommissioning.

Further, in the event that it is indeed cost-prohibitive for AMS to take those measures necessary to properly protect the environment through proper abandonment of these underground contaminated lines, the NRC should take those necessary measures on behalf of your licensee.

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Finally, bear in mind that as long as the footers remain un-grouted, the District will not allow AMS to re-connect to the public sewer system.

Please call me or Thomas Lenhart or Lawrence English of my legal staff at (216) 881-6600 if you have any questions or comments.

Very truly yours,

Erwin J. Odeal
Executive Director

encl.

cc: Richard Connelly
Rod Dell'Andrea
Thomas E. Lenhart
Lawrence K. English

Advanced Medical Systems, Inc.
1020 London Rd.
Cleveland, Ohio 44110
216-692-3270

October 17, 1995

Mr. James Caldwell
Nuclear Materials Inspection, Section 2
United States Nuclear Regulatory Commission
801 Warrenville Road
Lisle, Illinois 60523-4351

Re: Addition of Grout to Abandoned Footer Drain and 4" Discharge Line at AMS (USNRC License No. 34-19089-01)

Dear Mr. Caldwell:

In the letter dated July 19, 1995 from Advanced Medical Systems (AMS) to you, AMS stated its intention of using AV-118 Duriflex liquid grout to fill the abandoned section of the foundation drains at the AMS facility in order to immobilize contaminants that were present in the drain line. This type of grout was originally selected based on its properties (enters the system in a free-flowing liquid form, seals well, etc.).

After further review, AMS now intends to take no further action with regards to the grouting of the abandoned line. This decision was based on the fact that installation of this type of grout carries significant cost, involves the use of hazardous materials in the mixture (sodium persulfate catalyst), and requires a specialized delivery system. AMS maintains that the contaminated pipe is adequately isolated without the grout since there is a concrete isolation wall surrounding the drain and an impermeable liner covering the ground surface above the drains. Independent analysis of more than 30,000 gallons of water that has been collected from the newly installed footer drain system, which shows no detectable cobalt-60, further justifies this decision.

During a July 18, 1995 teleconference call between AMS and the USNRC, Mr. Jack Grobe also recommended that AMS grout in the entire length of the 4" discharge line that rests beneath the AMS basement. (Please recall that it was AMS's intent from the onset of the sewer remediation project to only grout in each end of the 4" line. This has been done). However, review of photographs of the AMS facility taken during building construction shows that a trench is in the vicinity of where the 4" line should currently lie. This implies that the line is imbedded in the cement foundation. AMS recently confirmed that the 4" discharge line is indeed located in the trench depicted in the photograph and is surrounded by concrete (i.e., the 4" line was laid in the trench and concrete was poured to fill the trench and completely surround the line). Therefore, it serves no purpose to grout in that section of the 4" line that traverses the building.

Should you have any questions or if I can provide any additional information, please call me at (216)

692-3270.

Sincerely,

Robert Meschter

Robert Meschter, R.S.O.

cc: D. Cesar
D. A. Miller, Esq. - Stavole & Miller
C. D. Berger, C.H.P. - IEM

Northeast Ohio Regional Sewer District

3826 Euclid Avenue • Cleveland, Ohio 44115-2504 216 • 881 • 6600 FAX: 216 • 881 • 9709

November 14, 1995

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

Re: Prohibition of Discharges from Advanced Medical Systems, Inc.

Dear Mr. Madera:

According to Lawrence English of my staff, you were informed on Wednesday, November 8, 1995, that your licensee Advanced Medical Systems, Inc. ("AMS") intended to discharge 3,000 gallons of water potentially contaminated with Cobalt-60. You were informed that such a discharge was contrary to standing prohibitions of the Northeast Ohio Regional Sewer District ("District"), and that such discharge had the potential to create an interference with the operations of the District. You chose to do nothing, stating that unless the discharge creates a health and safety violation, the Nuclear Regulatory Commission ("NRC") can do nothing. In the face of NRC inaction, the District sought and obtained a Supplemental Temporary Restraining Order ("TRO") prohibiting all discharges of any character from the 1020 London Road facility. A copy of the TRO is attached to this letter for your reference.

The purpose of this letter is twofold. First, it is to expressly inform you that all discharges from this facility are indeed prohibited. We understand that AMS has represented to you that they will not undertake evaporation of the wastewater they have collected until it appears that no alternative course is available. As other disposal means are now prohibited, you should take those measures to ensure that evaporation is commenced.

Secondly, the purpose of this letter is to urge you to take those measures necessary to compel AMS to begin evaporation as soon as possible. At the TRO hearing, Dwight Miller, one of the attorneys for AMS, stated that if AMS did not get rid of the water it had accumulated, pressure on the facility will build up. This concerns us greatly, insofar as several representative of AMS have indicated repeatedly that should pressure build up on the facility, the facility is put in danger of imminent collapse.

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Since there is existing NRC approval for AMS to evaporate the water accumulated at the facility, and other means of disposal are prohibited, the NRC should take those steps necessary to properly protect the neighborhood and environment around your licensee's facility by evaporating the collected wastewater.

Please call me, Thomas Lenhart or Lawrence English of my legal staff at (216) 881-6600 if you have any questions or comments.

Very truly yours,

William B. Schatz
General Counsel

encl.

cc: Erwin J. Odeal
Sara J. Fagnilli
Thomas E. Lenhart
Lawrence K. English

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

NORTHEAST OHIO REGIONAL SEWER DISTRICT, Plaintiff, v. ADVANCED MEDICAL SYSTEMS, INC., *et al.*, Defendants.	)	CASE NO. 1:94 CV 2555 JUDGE GEORGE W. WHITE **SUPPLEMENTAL TEMPORARY RESTRAINING ORDER**

This cause came on for hearing and was heard on the 13 day of November, 1995, before the Honorable Judge George W. White, upon motion of Plaintiff for a Supplemental Temporary Restraining Order restraining Defendant Advanced Medical Systems, Inc., and each of the other Defendants herein, and their agents, employees and those persons acting in concert or association with them (collectively "Defendant"), from certain conduct and activity, pending further hearing on Plaintiff's Motion for a Supplemental Temporary Restraining Order and Application for a Preliminary Injunction.

Upon consideration, the Court finds that Defendant was given notice of Plaintiff's intention to move for a Supplemental Temporary Restraining Order, through its counsel, and further finds Plaintiff's Motion for a Supplemental Temporary Restraining Order is well-taken because it clearly appears Plaintiff's Code of Regulations and Cease and Desist Order will be violated contrary to Ohio law unless a Temporary Restraining Order issues.

Issued 11-13-95

NOW, THEREFORE, IT IS ORDERED, ADJUDGED AND DECREED, that until November 27, 1995, on which date the Court shall hold a hearing on Plaintiff's Application for a Preliminary Injunction:

> Defendant AMS and its agents, employees or attorneys and those persons acting in concert or association with AMS are enjoined and restrained from discharging, in any manner, either directly or indirectly, any water, wastewater or stormwater from Defendants' 1020 London Road Facility into the public sewer system.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, this Supplemental Temporary Restraining Order is intended to supplement the Temporary Restraining Order entered by the Court on December 14, 1994, which is to remain in effect by stipulations of the parties until January 18, 1996.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, this Supplemental Temporary Restraining Order shall become effective without the filing of a bond.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, that the Clerk of this Court shall deliver sufficient certified copies of this Supplemental Temporary Restraining Order to Counsel for Plaintiff who, for purposes of serving this Supplemental Temporary Restraining Order, is appointed by this Court to make service upon Defendants and their counsel.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, that service of this Order be made as soon as possible.

Dated: 11-13-95

John M. Manos

JUDGE ~~GEORGE W. WHITE~~
John M. Manos

Ams. File

Advanced Medical Systems, Inc.
1020 London Road
Cleveland, OH 44110
(216) 692-3270
FAX # (216) 692-3269

FAX MESSAGE

TO: Mike Weber FROM: Bob M

FAX NO: DATE: 11-15-95

PAGE 1 OF 1.0

See attached - Do the Math - Compare To whats submitted in Lic. (Keep in Mind the Decayed values on the Spread sheet (4-1-95 Column) were Hand Calculated for the OLD Sheets (see Lic App). All Math From 4-1-95 → Future are Computer Calcs. All Columns on Spread sheet are summed By the Computer. Error May Be 1) original Hand Decay calc. or 2) Rounding errors

Thanx
Bob

E/109

CONFIDENTIAL - NOT FOR DISTRIBUTION

AMS BULK COBALT INVENTORY

APRIL 1, 1995

COBALT STORED IN CELL IN BULK CAPSULES

	LOT NO.	CAPSULE NO.	GRAMS	4/1/95 CURIES	10/1/95 CURIES	4/1/96 CURIES	10/1/96 CURIES	4/1/97 CURIES
1.	B461	XXVI(1)	3.68	339	317.43	297.23	278.32	260.61
2.	B458	XXIV*	55.44	1431	1339.95	1254.68	1174.85	1100.09
3.	B457	XXII(1)	263.50	1501	1405.69	1316.06	1232.32	1153.91
4.	B453	XXIII(1)	93.28	1214	1136.75	1064.42	996.69	933.27
5.	B439	I	242.78	259	242.52	227.09	212.64	199.11
6.	B449	II(1)	51.45	800	749.10	701.43	656.80	615.01
7.	B430	XXX(1)VI	289.00	1283	1201.36	1124.92	1053.34	986.32
8.	B408	XVI*	164.34	319	298.70	279.70	261.90	245.23
9.	B386	X*	270.53	446	417.62	391.05	366.17	342.87
10.	B381	XV*	188.04	358	335.22	313.89	293.92	275.22
11.	B378	IV7VI(1)	631.79	1070	1001.92	938.86	878.47	822.57
12.	B366	XIIIXIV(1)	451.29	393	367.99	344.58	322.65	302.12
13.	B309	B-124	284.80	543	508.45	476.10	445.80	417.44
14.	STANDARD WAFER SOURCES	SR-64*		16	13.11	12.22	11.42	10.75
15.	BULK III WASTE MATERIALS	TOTAL		9970.00	9335.62	8741.58	8185.36	7664.52
16.	BULK V WASTE MATERIALS							

(1) SOURCE TEMPORARILY STORED IN BLUE CASK ON 11-9-94
* POTENTIALLY STORED IN CELL FRONT PLUG

COBALT MOVED FROM GARDEN IN DOUBLE ENCAPSULATED BULK CONTAINERS TO GE-500 CASK IN 1994

LOT NO.	CONTAINER NO.	LOCATION	GRAMS	4/1/95 CURIES	10/1/95 CURIES	4/1/96 CURIES	10/1/96 CURIES	4/1/97 CURIES
B354	B107/B108	GE-500	484.63	443.80	386.72	362.11	339.07	317.50
B344	B106	GE-500	146.31	159.80	148.28	139.41	130.54	122.23
B341	B101	GE-500	257.45	163.00	152.63	142.92	133.82	125.31
B331	B102+B105	GE-500	363.31	409.00	382.98	358.61	335.79	314.42
B329	B103	GE-500	283.78	295.00	276.23	258.65	242.19	226.78
B323	B104+B105	GE-500	379.64	293.00	274.36	256.90	240.53	225.25
B309	B113	GE-500	302.05	177.09	165.74	155.19	145.32	136.07
B290	B109+B110	GE-500	323.92	322.00	301.51	282.33	264.36	247.54
B281	B110+B111	GE-500	449.42	345.00	323.05	302.49	283.24	265.22
B270	B112	GE-500	238.16	154.00	144.20	135.03	126.43	118.39
			TOTAL	2576.09	2412.69	2258.61	2114.89	1980.32

15 CONTAINERS

BULK COBALT TARGET SOURCES PUT IN GE-500 IN 1994

4/1/95 CURIES	10/1/95 CURIES	4/1/96 CURIES	10/1/96 CURIES	4/1/97 CURIES
8295.09	7767.19	7272.96	6810.15	6376.65

PICKER

COBALT 60 "WAFER" SOURCE (PELLETS) INVENTORY SUMMARY

	MFGR	S/N	ORIGINAL CURIE DATE	LOT NO.	LOCATION	4/1/95 CURIES	10/1/95 CURIES	4/1/96 CURIES	10/1/96 CURIES	4/1/97 CURIES
1.	PICKER	PX446	2/7/66	N/A	8-Y-2	42.00	39.33	36.83	34.48	32.29
2.	PICKER	PX43	12/3/60	128	4-U-1	11.40	10.67	10.00	9.36	8.76
3.	PICKER	PX452	3/3/66	395	4-U-3	62.30	57.40	53.75	50.33	47.12
4.	PICKER	PX439	1/31/66	434	4-U-2	64.00	59.93	56.11	52.54	49.20
5.	PICKER	PX377	2/15/65	504	3-V-2	53.30	50.10	46.91	43.92	41.13
6.	PICKER	PX466	3/15/66	521	1-W-2	54.40	50.94	47.70	44.66	41.82
7.	PICKER	PX376	1/30/65	533	1-W-1	24.50	22.94	21.48	20.11	18.83
8.	PICKER	PX456	4/15/66	547	3-V-2	41.20	38.58	36.12	33.83	31.67
9.	PICKER	PX372	12/30/64	548	3-V-3	19.30	18.07	16.92	15.85	14.84
10.	PICKER	PX477	7/15/66	562	4-T-1	21.30	19.76	18.50	17.32	16.22
11.	PICKER	PX375	1/30/65	586	6-Y-1	18.40	17.23	16.13	15.11	14.15
12.	PICKER	PX239 ("1239")	4/18/63	599	7-V-1	26.30	24.63	23.06	21.59	20.22
13.	PICKER	PX453	10/1/65	604	2-Y-2	45.60	42.70	39.98	37.44	35.05
14.	PICKER	PX257	7/1/63	618	G3-500	24.50	22.94	21.49	20.11	18.83
15.	PICKER	PX1249 (OLD 249)	6/8/63	633	7-X-3	32.40	30.34	28.41	26.60	24.91
16.	PICKER	PX1386 (OLD 385)	3/15/65	644	GE-500	32.40	30.34	28.41	26.60	24.91
17.	PICKER	PX447	1/31/66	675	GE-500	18.40	17.23	16.13	15.11	14.15
18.	PICKER	PX318	5/28/64	681	1-W-3	49.10	45.98	43.05	40.31	37.75
19.	PICKER	PX428	10/31/65	682	7-X-1	24.50	22.94	21.48	20.11	18.83
20.	PICKER	PX405	6/30/65	684	4-Y-3	53.50	50.10	46.91	43.92	41.13
21.	PICKER	PX1364 (OLD 364)	11/30/64	750	8-V-3	79.80	74.72	69.97	65.52	61.35
22.	PICKER	PX1426 (OLD 426)	10/30/65	742	GE-500	50.80	47.57	44.54	41.71	39.05
23.	PICKER	PX1410 (OLD 410)	7/30/65	784	3-X-1	62.30	58.34	54.62	51.15	47.89
24.	PICKER	PX1404	6/30/65	797	2-V-1	96.40	90.27	84.52	79.14	74.11
25.	PICKER	PX374	1/30/65	808	GE-500	22.80	21.35	19.99	18.72	17.53
26.	PICKER	PX1384	3/15/65	815	3-Y-1	38.60	36.14	33.84	31.69	29.67
27.	PICKER	PX1433 (OLD 433)	11/30/65	922	2-X-2	62.30	58.34	54.62	51.15	47.89
28.	PICKER	PX1351 (OLD 251)	6/20/63	832	GE-500	22.80	21.35	19.99	18.72	17.53
29.	PICKER	PX1379 (OLD 379)	2/15/65	834	GE-500	36.00	33.71	31.56	29.56	27.68
30.	PICKER	PX399	5/31/65	840	7-Y-1	116.60	109.18	102.23	95.73	89.64
31.	PICKER	PX1425 (OLD 425)	10/30/65	842	GE-500	73.70	69.01	64.62	60.51	56.66
32.	PICKER	PX1289 (OLD 289)	1/15/64	870	BLUE CASK	40.40	37.83	35.42	33.17	31.06
33	PICKER	PX384	8/26/62	877	2-W-2	35.10	32.87	30.78	28.82	26.98

34.	PICKER	PX3458 (OLD 458)	4/15/66	885	GB-500	72.80	68.17	63.80	59.77	55.97
35.	PICKER	PX440	1/31/66	926	GB-500	36.80	34.46	32.27	30.21	28.29
36.	PICKER	PX1317 (OLD 317)	5/25/64	966	7-Z-2	130.50	103.47	96.89	92.72	84.95
37.	PICKER	PX42	5/13/60	921	GB-500	28.30	26.31	24.66	23.07	21.50
38.	PICKER	PX1411 (OLD 411)	7/30/65	1036	GB-500	59.60	55.81	52.26	48.93	45.82
39.	PICKER	PX430	10/31/65	1095	8-Z-3	114.90	107.59	100.74	94.33	88.33
					TOTAL	1887.70	1767.59	1655.11	1549.80	1451.19

TOTAL SOURCES:	39
SOURCES STORED IN GARDEN:	25
SOURCES STORED IN HOT CELL:	0
SOURCES STORED IN GB-500 CASK:	12
SOURCES STORED IN BLUE CASK:	1

PICKER - AMS
SEALED SOURCES

	MFGR	S/N	CM	ORIGINAL CURIES-DATE	LOT NO.	LOCATION	4/1/95 CURIES	10/1/95 CURIES	4/1/96 CURIES	10/1/96 CURIES	4/1/97 CURIES
1.	PICKER	664	2.0	10/15/68	816	WH590C-179	86.00	80.53	75.40	70.61	66.11
2.	PICKER	879	1.0	9/1/71	831	6-U-3	63.10	59.08	55.33	51.81	48.51
3.	PICKER	725	2.0	7/1/69	873	3-W-1	105.20	98.51	92.24	86.37	80.87
4.	PICKER	PX269	1.0	9/20/63	N/A	3-Z-1	30.70	28.75	26.92	25.20	23.60
5.	PICKER	2002	1.5	5/1/73	832	GE-500	54.40	50.94	47.70	44.66	41.82
6.	PICKER	665	2.0	10/15/68	883	3-W-2	122.80	114.99	107.67	100.82	94.40
7.	PICKER	95	1.0	11/2/61	890	3-X-3	24.50	22.94	21.48	20.11	18.83
8.	PICKER	2066	1.5	5/15/74	894	2-Z-3	63.10	59.08	55.33	51.81	48.51
9.	PICKER	1363 (OLD 363)	2.0	11/30/64	904	5-U-1	99.90	93.54	87.59	82.02	76.80
10.	PICKER	887	2.0	10/1/73	907	8-V-1	122.80	114.99	107.67	100.82	94.40
11.	PICKER	789	2.0	4/1/70	915	2-X-3	152.50	142.80	133.71	125.20	117.24
12.	PICKER	883	2.0	9/1/71	919	GE-500	83.30	78.00	73.04	68.39	64.04
13.	PICKER	191	1.5	9/9/62	947	1-V-3	19.30	18.07	16.92	15.85	14.84
14.	PICKER	1513 (OLD 513)	2.0	12/31/66	978	4-Z-1	82.40	77.16	72.25	67.65	63.35
15.	PICKER	581	2.0	12/1/67	979	GE-500	73.70	69.01	64.62	60.51	56.66
16.	PICKER	644	2.5	8/15/68	990	BLUE CASK	249.30	224.07	209.82	196.46	183.96
17.	PICKER	636	3.0	7/1/68	1012	1-Z-1	59.60	55.81	52.25	48.93	45.82
18.	PICKER	2168	1.5	12/1/75	1020	9-Y-1	69.30	64.89	60.75	56.90	53.27
19.	PICKER	939	2.0	5/1/73	1037	6-Z-2	156.90	146.92	137.57	128.81	120.62
20.	PICKER	816	2.0	9/15/70	1040	1-X-2	169.20	158.43	148.35	138.91	130.07
21.	PICKER	2076	2.0	7/1/74	1047	1-X-3	126.20	118.17	110.65	103.61	97.02
22.	PICKER	587	2.0	12/16/67	1060	6-Y-3	159.60	149.44	139.94	131.05	122.69
23.	PICKER	871	2.0	6/25/71	1073	3-X-2	86.00	80.53	75.40	70.61	66.11
24.	PICKER	1679 (OLD 679)	2.0	1/1/69	1105	9-Z-2	94.50	88.47	83.03	77.75	72.80
25.	PICKER	PX784	1.0	3/9/78	N/A	6-Z-3	223.60	209.37	196.05	183.58	171.88
26.	PICKER	PX450	1.5	4/2/66	N/A	7-U-2	44.80	41.95	39.28	36.78	34.44
27.	PICKER	616	2.0	5/1/68	1135	9-Y-3	115.70	108.34	101.44	94.99	88.95
28.	PICKER	557	1.5	9/1/67	1151	GE-500	50.80	47.57	44.54	41.71	39.05
29.	PICKER	2117	2.0	9/1/75	1161	1-V-1	245.50	229.88	215.25	201.56	188.73
30.	PICKER	687	2.0	2/1/69	1164	1-V-1	59.60	55.81	52.26	48.93	45.82
31.	PICKER	2407	2.0	3/1/81	1166	3-Z-1	500.60	468.75	438.92	410.99	384.84
32.	PICKER	2394 (OLD 2060)	2.0	4/1/74	1167	1-X-1	188.50	176.51	165.27	154.76	144.91

33.	AMS	2476	2.0	1/1/83	1187	BLUE CASK	1102.10	1031.97	966.31	904.82	847.25
34.	AMS	2532	1.5	3/1/85	1189	BLUE CASK	414.70	388.31	363.60	340.47	318.80
35.	AMS	2411	2.0	5/1/81	1190	CELL	1137.20	1064.84	997.08	933.64	874.23
36.	PICKER	2245	2.0	5/1/77	1196	CELL	470.80	440.09	412.09	385.87	361.32
37.	AMS	2387	1.0	10/1/80	1201	CELL	425.20	398.14	372.81	349.09	326.88
38.	PICKER	2285	2.5	2/1/78	1202	CELL	403.30	377.64	353.61	331.11	310.04
39.	PICKER	PX2337	1.0	6/1/79	1204	CELL	299.80	280.72	262.86	246.14	230.47
40.	AMS	2487	1.5	3/1/83	1205	CELL	549.70	514.72	481.97	451.30	422.59
41.	PICKER	2236	1.5	2/1/77	1211	BLUE CASK	223.60	209.37	196.05	183.58	171.89
42.	PICKER	1202 (OLD 2021)	2.0	9/1/73	1212	9-W-2	342.00	320.24	299.86	280.78	262.92
43.	AMS	2527	2.0	1/1/85	1221	CELL	839.90	833.28	780.25	730.61	684.12
44.	PICKER	PX347	2.0	9/25/64	N/A	9-W-1	66.70	62.46	58.48	54.76	51.28
45.	AMS	2466	2.0	8/20/82	N/A	WHSE113	1435.40	1344.07	1258.54	1178.46	1103.48
46.	AMS	2583	2.0	3/18/88	N/A	WHSE115	2346.80	2386.27	2232.65	2090.59	1957.57
						TOTAL	14079.60	13183.72	12344.84	11559.33	10823.81

COMPETITORS' SOURCES

	MFGR	S/N	CM	ORIGINAL CURIES	DATE	LOT NO.	LOCATION	4/1/95 CURIES	10/1/95 CURIES	4/1/96 CURIES	10/1/96 CURIES	4/1/97 CURIES
1.	USN		2.0		9/2/76	740	5-Y-2	129.80	121.54	113.81	106.57	99.78
2.	USN		2.0		9/22/75	741	5-Y-3	76.30	71.45	66.90	62.64	58.66
3.	NPI	T31	2.0		5/1/83	764	8-W-2	241.1	225.76	211.39	197.94	185.35
4.	NPI	T24	2.11		5/1/83	774	8-X-3	316.5	296.36	277.50	259.85	243.31
5.	AECL (RADOG	C-106			6/7/76	727	7-W-2	32.4	30.34	28.41	26.60	24.91
6	USN	W57			10/8/76	790	GE-500	17.5	16.39	15.34	14.37	13.45
7.	USN				4/5/77	818	4-Y-2	28.9	27.06	25.34	23.73	22.22
8.	BUDD	T162				861	1-U-1	192	179.78	168.34	157.63	147.60
9.	GAMMA IND.	939/GI TS101	2.0		8/1/75	859	2-V-3	208.7	195.42	182.99	171.34	160.44
10.	NPI	T52	1.57		5/1/83	861	1-U-1	174.4	163.30	152.91	143.18	134.07
11.	GAMMA IND.	952/TS101			2/4/80	939	2-U-2	133.2	124.72	116.79	109.36	102.40
12.	NPI	T232	2.0		5/1/83	946	BLUE CASK	161.3	151.04	141.43	132.43	124.00
13.	NPI	T131	2.0		5/1/83	963	7-Z-3	208.7	195.42	182.99	171.34	160.44
14.	FRANCE	CEA2634	2.0		8/13/80	965	BLUE CASK	135.9	127.25	119.16	111.57	104.47
15.	NPI	T182	2.0		5/1/75	974	7-W-1	576.9	540.19	505.82	473.63	443.50
16	NPI	T205	1.56		5/1/83	980	1-Y-3	352.4	329.98	308.98	289.32	270.91
17.	GAMMA IND	945/TS101	2.0		7/15/83	986	1-Y-1	353.4	330.91	309.86	290.14	271.68
18.	NPI	T95	2.0		5/1/83	987	1-Y-2	432.2	404.70	378.93	354.84	332.26
19.	NPI				12/30/80	989	7-Y-2	28.9	27.06	25.34	23.73	22.22
20.	NPI	T244	1.5		5/1/83	992	7-W-3	323.5	302.92	283.64	265.59	248.69
21.	USN	362			3/3/81	998	3-Z-3	271.8	254.51	238.31	223.15	208.95
22	FRANCE	CEA3605			3/16/81	1004	BLUE CASK	245.5	229.88	215.25	201.56	188.73
23.	USN				4/10/81	1005	1-Z-3	529.6	495.90	464.35	434.80	407.13
24.	NPI	T145	2.16		5/1/83	1011	1-V-2	518.2	485.23	454.35	425.44	398.37
25.	NPI	T187	2.03		5/1/83	1017	9-Y-2	288.5	270.14	252.95	236.86	221.79
26.	NPI				8/1/81	1024	8-Z-2	83.5	78.09	73.04	68.39	64.04
27.	NPI	T454	2.10		12/1/80	N/A	3-T-3	585.7	548.43	513.54	480.86	450.26
28.	NPI	T121	1.5		4/25/75	1034	3-Y-3	256	239.71	224.46	210.18	196.80
29	NPI	T308	2.0		5/1/83	1038	3-Y-2	503.3	471.28	441.29	413.21	386.92
30	NFI	T189	2.5		5/1/83	1043	5-U-1	424.4	397.40	372.11	348.33	326.26
31.	USN		2.0		9/1/82	1071	6-Z-1	202.5	189.61	177.55	166.25	155.67
32.	NFI	7462	2.0		5/1/83	1075	2-Z-2	525.2	491.78	460.49	431.19	403.75

33.	NPI	T263	2.0	12/15/77	1087	7-Y-3	705.8	660.89	618.84	579.46	542.59
34.	USN		1.5	4/25/83	1091	2-Y-4	133.2	124.72	116.79	109.36	102.40
35.	USN			4/24/83	1092	3-Y-3	449.8	421.18	394.38	369.29	345.79
36.	NPI	T337	2.0	4/27/79	1103	7-Z-1	427.8	400.58	375.09	351.22	328.87
37.	NPI	T177	2.12	7/15/76	1116	6-U-2	664.6	622.31	582.71	545.64	510.92
38.	NPI	T577	2.06	10/1/82	N/A	9-Z-3	470.8	440.84	412.79	386.53	361.93
39.	AECL	C-172			N/A	BLUE CASK	192	179.78	168.34	157.63	147.60
40.	NPI	T340	1.5	3/1/85	1129	9-Z-1	397.2	371.91	348.26	326.10	305.35
41.	NPI	T388	2.0	12/1/79	1134	1-U-3	622.5	582.89	545.80	511.07	478.55
42.	NPI	T645	2.08	6/1/85	1136	BLUE CASK	752.3	704.43	659.61	617.64	578.34
43.	NPI	T514	2.08	9/18/81	1139	2-W-3	687.4	643.66	602.70	564.35	528.44
44.	NPI	T275	2.0	1/20/78	1142	5-U-3	690	646.10	604.98	566.49	530.44
45.	AMERSHAM	GET-15-15			N/A	BLUE CASK	192	179.78	168.34	157.63	147.60
46.	NPI	T672	2.0	1/13/84	1148	3-T-1	995.2	931.86	872.58	817.06	765.07
47.	NPI	RT76	2.0	10/3/80	1150	3-U-2	450.7	422.02	395.17	370.02	346.48
48.	NPI	T472	2.0	1/19/81	1154	4-Z-3	583.9	546.75	511.96	479.38	448.88
49.	NPI	T491	2.0	3/23/81	2162	1-U-2	955.7	894.89	837.95	784.63	734.70
50.	NPI	T707	2.0	8/1/84	1230	9-W-1	874.2	818.57	766.49	717.72	672.05
51.	NPI	T705	2.14	6/2/84	1224	WHSB 590C-176		1524.7	1427.68	1336.84	1251.78	1172.13
52.	NPI	T772	2.0	7/1/85	1237	9-W-2		922.4	863.71	808.75	757.29	709.30
53.	THERATRONIC	538:7	1.5	11/1/85	1242	590B-139		2280.5	2135.30	1999.52	1872.29	1753.15
54.	NPI	T922	2.1	12/2/86	1253	550-208		2615.5	2449.98	2293.24	2147.32	2010.69
55.	JALAPA				1254	S/E 117		424.4	397.40	372.11	348.43	326.26
56.	AMERSHAM	03432T	2.0	10/10/85	1261	S/E 106		1638.7	1534.43	1436.79	1345.37	1259.76
						TOTAL		28389.30	26414.34	24733.60	23159.80	21685.14

CESIUM INVENTORY - NONE KNOWN AS OF 4/1/95

CO-60 INVENTORY SUMMARY

*PAGE	TYPE	4/1/95 CURIES	10/1/95 CURIES	4/1/96 CURIES	10/1/96 CURIES	4/1/97 CURIES
1	BULK	9970.00	9335.61	8741.58	8185.36	7669.12
2	DEBC*	2576.00	2412.09	2258.61	2114.89	1979.32
2	TARGET	8293.00	7767.19	7272.96	6810.18	6376.85
4	PICKER-WAFER	1887.70	1767.59	1655.13	1549.89	1451.19
6	PICKER-AMS	14079.60	13183.72	12344.84	11559.33	10823.81
8	COMPETITORS	28209.30	26416.34	24733.60	23159.89	21686.14
	TOTAL	65017.60	60880.53	57006.70	53379.37	49982.84

GE-500 SUMMARY (QUANTITIES INCLUDED IN ABOVE SUMMARY); CASK LOADED IN 1994

NO. OF CONTAINERS	TYPE	4/1/95 CURIES	10/1/95 CURIES	4/1/96 CURIES	10/1/96 CURIES	4/1/97 CURIES
15	DEBC*	2576	2412.09	2258.61	2114.89	1980.32
	BULK	8295	7767.19	7272.96	6810.18	6376.85
12	PICKER-WAFER	488.32	457.25	428.15	400.91	375.40
4	PICKER-AMS	362.23	345.54	329.92	315.29	301.59
1	COMPETITOR'S	17.5	16.39	15.34	14.37	13.45
	TOTAL	11639.05	10998.46	10304.99	9655.65	9047.62

*DOUBLE ENCAPSULATED BULK CONTAINERS

6 MONTH DECAY FACTOR FOR CO-60 = 0.93637

Advanced Medical Systems, Inc.
1020 London Road
Cleveland, OH 44110
(216) 692-3270
FAX # (216)692-3269

Ams Gle

FAX MESSAGE

TO: Mike weber

FROM: Bob M

FAX NO:

DATE: 11-15-95

PAGE OF 1.3

Per Your Request & FYI
See ATTached

Thanx

EH10

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

NORTHEAST OHIO REGIONAL SEWER DISTRICT, Plaintiff, v. ADVANCED MEDICAL SYSTEMS, INC., *et al.*, Defendants.	CASE NO. 1:94 CV 2555 JUDGE GEORGE W. WHITE **SUPPLEMENTAL TEMPORARY RESTRAINING ORDER**

This cause came on for hearing and was heard on the 13 day of November, 1995, before the Honorable Judge George W. White, upon motion of Plaintiff for a Supplemental Temporary Restraining Order restraining Defendant Advanced Medical Systems, Inc., and each of the other Defendants herein, and their agents, employees and those persons acting in concert or association with them (collectively "Defendant"), from certain conduct and activity, pending further hearing on Plaintiff's Motion for a Supplemental Temporary Restraining Order and Application for a Preliminary Injunction.

Issued 11-13-95

Upon consideration, the Court finds that Defendant was given notice of Plaintiff's intention to move for a Supplemental Temporary Restraining Order, through its counsel, and further finds Plaintiff's Motion for a Supplemental Temporary Restraining Order is well-taken because it clearly appears Plaintiff's Code of Regulations and Cease and Desist Order will be violated contrary to Ohio law unless a Temporary Restraining Order issues.

NOW, THEREFORE, IT IS ORDERED, ADJUDGED AND DECREED, that until November 27, 1995, on which date the Court shall hold a hearing on Plaintiff's Application for a Preliminary Injunction:

> Defendant AMS and its agents, employees or attorneys and those persons acting in concert or association with AMS are enjoined and restrained from discharging, in any manner, either directly or indirectly, any water, wastewater or stormwater from Defendants' 1020 London Road Facility into the public sewer system.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, this Supplemental Temporary Restraining Order is intended to supplement the Temporary Restraining Order entered by the Court on December 14, 1994, which is to remain in effect by stipulations of the parties until January 18, 1996.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, this Supplemental Temporary Restraining Order shall become effective without the filing of a bond.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, that the Clerk of this Court shall deliver sufficient certified copies of this Supplemental Temporary Restraining Order to Counsel for Plaintiff who, for purposes of serving this Supplemental Temporary Restraining Order, is appointed by this Court to make service upon Defendants and their counsel.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, that service of this Order be made as soon as possible.

Dated: 11-13-95

John M. Manos

JUDGE ~~GEORGE W. WHITE~~
John M. Manos

PTI ENVIRONMENTAL SERVICES

** PLEASE DELIVER THE FOLLOWING FACSIMILE ASAP **

DATE: November 15, 1995

SEND TO:	Name	Company	Fax #	Speed #	Telephone #
X	Scott Eves	Shieldalloy	(609) 697-9025	100	(609) 692-4200
X	Pat Lee	Cyprus Foote	(303) 643-5988	101	(303) 643-5652
___	David Smith	Shieldalloy	(609) 697-9025	100	(609) 692-4200
X	James Valenti	Shieldalloy	(609) 697-9025	100	(609) 692-4200
X	David Berz	Weil, Gotshal & Manges	(202) 857-0940	104	(202) 682-7190
___	Tom Matthews	Shieldalloy	(614) 432-5937	105	(614) 432-6345
X	Richard Fahey	Arter & Hadden	(614) 221-0479	106	(614) 229-3260
X	Michael Flan	Shieldalloy	(212) 481-7124	107	(212) 686-4008
X	Don Patterson	Beveridge & Diamond	(202) 789-6190	108	(202) 789-6032
X	David Hunt	OEPA-DDGW	(614) 385-6490	109	(614) 385-8501
X	Brian Blair	OEPA-DERR	(614) 385-6490	109	(614) 385-8501
X	Olen Ackman	OEPA-DERR	(614) 385-6490	109	(614) 385-8501
X	Peter Whitehouse	OEPA-DERR	(614) 644-3250	112	(614) 644-2924
X	Jim Webb	ODH-Bur. Rad. Health	(614) 644-1909	114	(614) 644-2718
X	James Kennedy	USNRC	(301) 415-5397	116	(301) 415-6668
X	Mark Thaggard	USNRC	(301) 415-5399	110	(301) 415-6718
X	Raymani Glinski	USNRC	(708) 515-1259	113	(708) 829-9813
X	John House	USNRC	(708) 515-1259	113	(708) 829-9813
X	Murray Wade	ORNL	(615) 576-6661	122	(615) 574-8632
X	Jennifer Wendel	USEPA	(312) 886-4071	117	(312) 886-0394
X	Michael MacMullen	USEPA	(312) 353-5374	121	(312) 886-7342
X	Duane Carey	Bennett & Williams	(614) 882-4260	118	(614) 882-9122
X	Brian Kelly	IEM, Inc.	(615) 531-9130	119	(615) 531-9140
X	Peck	PTI, Lake Oswego	(503) 636-4315	102	(503) 636-4338

FROM: Gordon Sweet
PTI Environmental Services
15375 SE 30th Place, Suite 250
Bellevue, WA 98007

(206) 643-9803
Fax: (206) 643-9827

CHARGE NUMBER: CA38-13-01

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COMMENTS: The agenda is attached for the conference call scheduled for today (Wednesday) 11/15 at 3:00pm Eastern. Please dial 1-800-966-6338.

ATTACHMENTS: Agenda **TOTAL PAGES (including this cover page)** 2

WEEKLY CONFERENCE CALL AGENDA

DATE & TIME: November 15, 3:00 PM EASTERN

DIAL-IN: 1-800-966-6338

1. Schedule for Phase I and II ERA report
2. Confirm schedule for receipt of OEPA comments on the draft FS
3. Confirm schedule and agenda for 12/5 meeting in Cambridge
4. Status of preliminary EIS
5. Status of Kd study
6. Status of other deliverables
7. Other outstanding issues

Post-it® Fax Note 7671	Date 11-15	# of pages ▸ 3
To Roy Caniano	From Larry English	
Co./Dept. NRC	Co. NEORSD	
Phone #	Phone #	
Fax # 708-515-1259	Fax #	

IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

NORTHEAST OHIO REGIONAL SEWER DISTRICT Plaintiff, v. ADVANCED MEDICAL SYSTEMS, INC., et al. Defendants.	)	CASE NO. 249860 JUDGE STUART A. FRIEDMAN **TEMPORARY RESTRAINING ORDER**

This cause came on for hearing on the 28th day of October, 1994, before the Honorable Stuart A. Friedman, upon motion of Plaintiff for a Temporary Restraining Order restraining Defendant Advanced Medical Systems, Inc., each of the other defendants herein, and their agents (collectively "Defendants"), from certain conduct and activity, pending further hearing on Plaintiff's Application for a Preliminary Injunction.

Upon consideration, the Court finds that Defendants were given notice of Plaintiff's intention to move for a Temporary Restraining Order, through its counsel, and further finds Plaintiff's Motion for a Temporary Restraining Order is well-taken because it clearly appears Plaintiff's Code of Regulations will be violated contrary to Ohio law before Defendants can be fully heard in this matter unless a Temporary Restraining Order issues.

NOW, THEREFORE, IT IS ORDERED, ADJUDGED AND DECREED, that until November 29, 1994:

E111

(1) Defendants and their agents are enjoined and restrained from discharging any water, wastewater or stormwater runoff from Defendants' 1020 London Road Facility into the public sewer system;

(2) Defendants are ordered to implement alternative method(s) to collect and dispose of the discharges enjoined by this Order. Said method(s) must be in place and able to receive the discharge by or before 5:00 p.m. on November 18, 1994. Defendants shall immediately certify to this Court (with copy to Plaintiff) that such method(s) have been implemented;

(3) Plaintiff is hereby permitted to install a temporary compression-type plug in the 1020 London Road lateral sewer near its connection with the London Road Interceptor immediately after Defendants have implemented the alternative disposal method(s) described in the preceding paragraph;

(4) Defendant Advanced Medical Systems, Inc. is ordered to allow Plaintiff, Northeast Ohio Regional Sewer District, to conduct a full inspection(s) of defendant's facility (pursuant to all applicable Nuclear Regulatory Commission regulations) on or before November 28, 1994, to ensure that all discharges from the 1020 London Road facility are addressed by the above-described actions.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, this Temporary Restraining Order shall become effective without the filing of a bond, as plaintiff is a political subdivision not required to post a bond under law.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, that the Clerk of this Court shall deliver sufficient certified copies of this Temporary Restraining Order to Counsel for Plaintiff who, for purposes of serving this Temporary Restraining Order, is appointed by this Court to make service upon Defendants and their counsel.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, that service of this Order be made as soon as possible.

Dated: 15 November 94

JUDGE STUART A. FRIEDMAN

RECEIVED FOR FILING

NOV 15 1994

THE STATE OF OHIO
Cuyahoga County } SS.

I, GERALD E. FUERST, CLERK OF THE COURT OF COMMON PLEAS WITHIN AND FOR SAID COUNTY.

HEREBY CERTIFY THAT THE ABOVE AND FOREGOING IS TRULY TAKEN AND COPIED FROM THE ORIGINAL

NOV-15, 1994 [illegible]

NOW ON FILE IN MY OFFICE.

WITNESS BY HAND AND SEAL OF SAID COURT THIS 15 DAY OF November A.D. 1994

GERALD E. FUERST, Clerk

By [signature] Deputy

City of Cleveland

MICHAEL R. WHITE, MAYOR

WILLIAM E. LEE
CHIEF OF FIRE

DIVISION OF FIRE
1645 SUPERIOR AVENUE
CLEVELAND, OHIO 44114-2964
(216) 664-6800
FAX (216) 664-6816

November 21, 1995

Mr. Robert Meschter
Radiation Safety Officer
Advanced Medical System, Inc.
121 North Eagle St.
Geneva, Ohio 44041

Re: 1020 London Rd.
Advanced Medical Systems, Inc.
Emergency Plan

Dear Mr. Meschter,

This letter is to inform you that the Cleveland Fire Department considers the Northeast Ohio Regional Sewer District (NEORSD) as a first responder type organization within the City of Cleveland.

The supervisory staff and field personnel of NEORSD are highly professional. NEORSD personnel are trained and equipped to respond to emergencies and investigations, including hazardous material type incidents. NEORSD has assisted the Cleveland Fire Department on many occasions with spills and releases that have affected the sewer system and potentially the health and safety of the citizens of the City of Cleveland.

If you have any questions, you may contact Lt. Mark Scott of the Cleveland Fire Prevention Bureau Hazardous Material Section at 664-6664.

Sincerely,

William E Lee KGO

William E. Lee, Chief
Division of Fire

cc: Capt. Glauner, Acting Fire Marshal
Lt. Scott, FPB Haz Mat
William Gruber, Law Dept.
Rich Connelly, NEORSD
James L. Caldwell, USNRC, Region III
1020 London Rd. File

E112

November 29, 1995

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

Dear Mr. Meschter:

This is in response to your October 17, 1995 letter, in which you discuss the addition of grout to the abandoned footer drain and four inch discharge line at AMS.

Regarding the abandoned footer drain, you refer to an "independent analysis of more than 30,000 gallons of water that has been collected from the newly installed footer drain system, which shows no detectable cobalt-60." Please provide us the results of this analysis, and explain when, where, and how the water samples were collected.

Regarding the four inch discharge line, you refer to photographs of the AMS facility which show "that a trench is in the vicinity of where the 4" line should currently lie." In addition, you state that "AMS has recently confirmed that the 4" discharge line is indeed located in a trench ... and is surrounded by concrete." During an NRC inspection on November 2-3, 1995, you provided one of the photographs to which you refer in your letter to a member of my staff. You also discussed the results of drilling tests being performed in the basement of the AMS facility which, you indicated, show that the discharge line is surrounded by concrete. Please furnish us with an update on this work, and provide, in writing, a detailed explanation of how AMS confirmed that the four inch discharge line is located in a trench and is surrounded by concrete.

Should you have any questions regarding this letter, please do not hesitate to contact me.

Sincerely,

Original Signed By

John R. Madera, Chief
Nuclear Materials Licensing Branch

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

See Attached Distribution

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Marian Zobler
U.S. Nuclear Regulatory Commission

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