



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

February 5, 1996

Mr. William M. Floyd, Program Manager
Radiation, Licensing and Registration
Hazardous and Radioactive Materials Bureau
Environment Department
State of New Mexico
2044 Galisteo Road
P.O. Box 26110
Santa Fe, NM 87502

Dear Mr. Floyd:

The NRC staff has completed its review of your request to determine whether a protocol, submitted to you by Interstate Nuclear Services (INS), meets the solubility requirements in Section 20.2003 of 10 CFR Part 20. The material reviewed consisted of your November 12, 1996 letter to me with attachments, and the December 19, 1996 note to me from Walter Medina enclosing supplemental material, in particular, a December 2, 1996 letter to you from Chris Petropoulou of Patterson and Associates, Inc.

Based on our review, we do not believe that the information submitted is sufficiently complete to permit a comprehensive licensing review to determine whether or not the system proposed for use by INS at their Santa Fe facility meets the requirements in 10 CFR Part 20, as supplemented by the guidance in the NRC's Information Notice (IN) 94-07, "Solubility Criteria for Liquid Effluent Releases to Sanitary Sewerage Under the Revised 10 CFR Part 20." Although the treatment methods appear to be standard industry practice for treating the wastewater, the INS protocol makes no mention of sewer discharges nor does it mention testing of the discharges for meeting compliance with the regulations. For example, information to confirm system capabilities and specifications and on the testing and quality assurance program that would be performed during operations are areas that should be addressed in the application. The protocol does not address testing of discharges for compliance with regulatory requirements nor compliance with the protocol specifications.

The INS needs to confirm the proposed system capabilities and specifications as well as confirm that proposed operations would continue to meet the specifications necessary to comply with regulatory requirements. Of particular concern is a statement in the INS protocol that indicates that the proposed system would be designed to use a screen shaker with a 44 micron filter pore size, and a wastewater filter capable of removing portions of suspended solids with a size down to 1 micron. One of the recommended procedures referenced in IN 94-07 (ASTM D1888-78, "Standard Test Methods for Particulate and Dissolved Matter, Solids, or Residue in Water") states that a 0.45 micron pore size filter should be used. Thus, it appears radioactive particles with a diameter of less than 44 microns could be contained in the effluent sewer discharge. If so, that radioactive material

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in the discharge would not be soluble, per the guidance in IN 94-07. Two other INS facilities, Royerford, PA and Columbia, SC, respectively, are approved for operation with wastewater filter sizes of 20-25 microns. The NRC recognizes that alternative criteria, other than that identified in the IN, may be acceptable on a case-by-case basis, yet INS has provided no supporting documentation to support the use of any alternate criteria for sanitary sewer discharge.

Given that the provided documentation was inadequate for a determination of the solubility requirements per 10 CFR 20.2003, we consider this technical assistance response to fall within the purview of routine technical assistance, and as such, it is not cost reimbursable by New Mexico.

Finally, we are providing copies of this response to Patricio Cuerrerortiz, Santa Fe Public Utilities Department Director and to Caron Balkany, Concerned Citizens for Nuclear Safety, who have written to us expressing interest in your technical assistance request.

We trust this responds to your request. If we may be of further assistance, please do not hesitate to contact us.

Sincerely,

A handwritten signature in dark ink, appearing to read "Paul H. Lohaus", written in a cursive style.

Paul H. Lohaus, Deputy Director
Office of State Programs

cc:

C. Balkany

P. Cuerrerortiz

W. M. Floyd

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FEB 05 1997

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Sincerely, Original Signed By:
PAUL H. LOHAUS

Paul H. Lohaus, Deputy Director
Office of State Programs

cc:
C. Balkany
P. Guerrerortiz

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EXECUTIVE TASK MANAGEMENT SYSTEM

<<< PRINT SCREEN UPDATE FORM >>>

TASK # - 6S286

DATE- 11/20/96

MAIL CTRL. - 1996

TASK STARTED - 11/20/96

TASK DUE - / /

TASK COMPLETED - / /

TASK DESCRIPTION - 11/12/96 - TAR - PROTOCOL MEETS SOLUBILITY REQUIREMENTS
FOR RELEASE OF RADIONUCLIDES INTO SANITARY SEWER

REQUESTING OFF. - NM

REQUESTER - W. FLOYD

WITS -

0 FYP - N

PROG. -

PERSON -

STAFF LEAD -

PROG. AREA -

PROJECT STATUS -

OSP DUE DATE:

PLANNED ACC. - N

LEVEL CODE - 1

CC: RLB
PHL

Review IN
and make technical
judgment. NMSS
should be on reply
concourse.

Assigned to: TJO

Due Date:

Please contact Floyd to let
him know you are working on the
request and to determine when he
needs a reply. Thanks
H82

Contacted 11/25
Need ASAP - no date
licensee UTR - will
be re-issued when
NRC OKs.
TMS