

From: Michael F. Weber (MFW), R III
To: TW4:HMS1:HMS3:CH1:CH2:WGS WSnell, R III
Date: Wednesday, August 30, 1995 6:26 pm
Subject: Engelhard -Forwarded -Reply

Thanks for the clarification. In short, your message is that NRC is involved in both Engelhard and Chevron. That is important because we have jurisdiction for source material under the Atomic Energy Act. I agree with the view that we might exercise discretion and not get involved if the contamination were < 0.05%, but that needs to be a conscious decision by NRC. In our review, it sounded as if we were simply deferring to the State, even though they lacked jurisdiction (Ohio is not yet an Agreement State). If I have bolixed something in my summary, please clarify.

Mike

From: William G. Snell (WGS)
To: CH1:HMS3:HMS1:TW4:TW7:MFW
Date: Thursday, August 31, 1995 7:39 am
Subject: Engelhard -Forwarded -Reply -Reply

Mike,

Your understanding is correct.

Bill

C/43

September 28, 1995

Chevron Chemical Company
Environmental & Health Protection
ATTN: Mr. R. William Potter
Senior Environmental Projects Engineer
6001 Bollinger Canyon Road
P.O. Box 5047
San Ramon, CA 94583

SUBJECT: RADIATION PROTECTION INSPECTION ON SEPTEMBER 7, 1995

Dear Mr. Potter:

This refers to the special inspection conducted by Messrs. Raymant Glinski and John House of this office on September 7, 1995; and to the telephone conversation between Mr. Joe Davis of Foster Wheeler Environmental Corporation and Mr. William Snell of this office on September 11, 1995. This inspection included a review of the activities involving the remediation of former Harshaw Chemical Building Plant C at 1000 Harvard Avenue, Cleveland, Ohio. At the conclusion of the inspection, aspects of the inspection were discussed with members of the onsite contractor personnel.

The areas examined during this inspection are identified in the enclosed report. Within these areas, the inspection consisted of interviews with personnel, selective examination of representative records, assessment of radiation protection training, and observation of decontamination and radiation protection practices. The inspectors also toured the Plant "C" building.

No violations of NRC requirements were identified during the course of this inspection.

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

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

Sincerely,

Original Signed By
W. G. Snell for
J. W. McCormick-Barger, Chief
Decommissioning Section

Project Code: 687
Enclosure: Inspection Report

bcc w/encl: M. Weber, NMSS
PUBLIC (IE07)

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OFFICE	RIII	E	RIII	E	RIII	E	RIII	E
NAME	Glinski/cah RO		House MB		Snell WGS		McBarger WGS	
DATE	09/25/95		09/25/95		09/25/95		09/23/95	

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Project Code: 687

Docket No. None

License No. None

Owner: Chevron Chemical Company

Inspection At: Former Harshaw Chemical Building Plant C
1000 Harvard Avenue
Cleveland, Ohio

Onsite Inspection Conducted: September 7, 1995

Inspection By:

Raymont L. Glinski
Raymont L. Glinski
Radiation Specialist

9-25-95
Date

John E. House
John E. House
Senior Radiation Specialist

9/25/95
Date

Approved By:

William S. Barger
J. W. McCormick-Barger, Chief
Decommissioning Section

9/28/95
Date

Inspection Summary

Inspection on September 7, 1995

Areas Inspected: This was a special inspection to assess the radiation protection training and practices conducted for the decommissioning activities at the former Harshaw Chemical Building Plant C. The inspectors also observed decontamination activities and examined instrument calibration records.

Results: All aspects of radiation protection and calibration were determined to be in compliance with NRC regulations and the NRC approved Decommissioning Plan.

DETAILS

1. Persons Contacted

*Rick Storey, Foster Wheeler Field Operations Leader
@Joe Davis, Site Health and Safety Coordinator

@Individual present during the telephone conversations on July 20 and September 11, 1995.

*Individual present during the inspection on September 7, 1995.

2. Background

Natural uranium was used in the production of uranium hexafluoride for the Manhattan Engineering District and Atomic Energy Commission (AEC) in the 1940's and 1950's at this site. Building C was the main-processing building, and is made of brick & concrete with one, two and three-story sections, of 66,500 ft². Building C was decommissioned by the Harshaw Chemical Company and released from AEC control in 1960. Currently, the Engelhard Corporation owns the entire site except for Building C, which is owned by the Chevron Chemical Company.

From 1976 through 1979, surveys of this site were conducted by Argonne National Laboratory for the Department of Energy (DOE). These surveys identified residual uranium contamination in excess of NRC release limits within Building C. In 1992, Chemical Waste Management conducted additional surveys of Building C for Chevron and confirmed the existence of considerable uranium contamination in excess of NRC release limits. Because DOE determined that they had no further responsibility for the site, Chevron assumed responsibility for the remediation of Building C. In June 1995, the Decommissioning Plan for Building C was approved, with work beginning in July 1995.

3. Training

The inspectors interviewed the Field Operations Lead and determined that his past training and experience in radiation protection as a senior health physics technician were adequate to fulfill the duties of his current position.

The inspectors examined the radiation protection training manual distributed to the radiation workers and were informed that this course involved six hours of classroom work. The content of this training appeared adequate to meet the training requirements specified by the "Radiological Health and Safety Plan for the Building Decontamination/Decommissioning at the Harshaw Chemical Site Plant-C". In addition, the workers received two hours of training on the Health and Safety Plan.

Discussions with the Health and Safety Coordinator indicated that he had the authority to determine the level of training for site personnel. Depending on the scope of work to be performed, he could waive the six hour formal training course. A review of the Health and Safety Plan confirmed that he had this authority. The Health and Safety Plan also stated that training for all field personnel, including subcontractors, would be provided to specifically address their activities.

No violations of NRC requirements were identified.

4. Radiation Protection Practices

The inspectors interviewed the Field Operations Lead and other staff about the site-specific radiation protection practices and the Radiation Work Permits (RWP) under which the laborers were working. The following information was obtained during the interviews:

- A urine sample for bioassay had been obtained from each worker before starting work at the site, and arrangements were available to collect and analyze urine samples from workers after a suspected intake of contamination.
- The current RWP required a hard hat, safety glasses, coveralls, shoe covers, and gloves. Rubber gloves were required for working with wet material.
- The floor areas and equipment being decontaminated were kept wet to inhibit the generation of airborne contamination.
- Hoods and respirators were required for specialized decontamination activities.
- The entire Building C was considered a Radiation Control Area (RCA).
- Workers were required to sign-in and sign-out on the RWP log sheet each time they entered and exited the RCA. A review of several of the log sheets indicated that logs for August 5-6, 1995 appeared missing. It was subsequently determined that new sheets had inadvertently not been posted for the weekend of August 5-6, 1995. As a result, workers signing in over the weekend had signed in on the Friday, August 4, 1995, sign-in log. The Health and Safety Coordinator indicated he would be more diligent in ensuring new log sheets were posted in the future.
- Workers conducted whole body frisks prior to removal of protective clothing (PC), and after removal of PC a hand and foot frisk was conducted.

The inspectors observed that the radiation protection practices were being adequately implemented by the workers.

The two RWPs written to date were reviewed and they appeared to be sufficient for the radiological condition of the RCA. The inspectors discussed with the staff the need to issue another RWP if the decommissioning work resulted in increased removable or airborne radioactivity.

Radwaste was being temporarily stored in marked bags within the RCA.

No violations of NRC requirements were identified.

5. Instrument Calibration and Checks

The inspectors noted that the radiation detection instruments were in calibration and that daily performance checks were being conducted. The certificates for the check sources and the daily source check logs were examined and found to be sufficient.

No violations of NRC requirements were identified.

6. Exit Meeting

An exit meeting was conducted on September 7, 1995, with the individuals specified in Section 1 of this report. The preliminary results of the inspection were discussed. The licensee did not identify any information as proprietary.