GENERAL ATOMICS

May 22, 1997
696-2739

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VIA EXPRESS DELIVERY SERVICE

Mr. Charles E. Gaskin
Licensing Section 1 / Licensing Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: **Docket No. 70-734; SNM-696; Notice of Intent to Commence Decommissioning of TRIGA Fuel Fabrication Facility**

Dear Mr. Gaskin:

On September 30, 1995, General Atomics (GA) permanently ceased all TRIGA fuel fabrication activities at its TRIGA Fuel Fabrication Facility (TFFF) located on GA's Main Site in San Diego, California. All TRIGA fuel fabrication equipment has now been entirely removed and the facility has been radiologically characterized. Now, pursuant to 10 CFR 70.38 (g) (1), GA intends to proceed, unless advised to the contrary, with the decommissioning of its TFFF by following procedures and conducting activities that have been previously approved by the Commission. As detailed below, GA has previously implemented the requisite procedures and activities on numerous occasions.

As mentioned above, the TFFF has been characterized for radiological contaminants. The results of the characterization demonstrated that most of the floors, walls, and exterior areas have no significant contamination and will require little or no decontamination to meet the criteria for release to unrestricted use. The floor seams (expansion joints) and isolated locations on the floor do contain some residual enriched uranium contamination and the facility's HEPA system is internally contaminated with same.

The objective of the TFFF decommissioning effort is to obtain the release of the TFFF (building 22) to unrestricted use and its deletion from SNM-696. The decommissioning will be performed with the structure left in place, followed by an NRC confirmatory survey and release to unrestricted use. Four basic decommissioning alternatives were evaluated; namely: "Leave in Place," "Entombment," "Dismantlement," and "Decommissioning in Place." The decommissioning in place alternative was selected based on the results of the characterization indicating minimal effort required to decontaminate the facility.

Following decontamination, a comprehensive final radiation and residual contamination survey will be performed and documented in the form of a report. The scope and content of this survey report will be similar to those that GA has submitted in support of numerous previous facility/site releases to unrestricted use (See below). The documented results of this survey will demonstrate that the previously approved criteria for release of facilities, equipment and residual soil to unrestricted use (Refs. 1-7) have indeed been met. This report will be submitted to the NRC in support of GA's request for the release of the TFFF to unrestricted use and its deletion from GA's SNM license.

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As mentioned above, GA's intent to proceed with the decommissioning of its TFFF without first submitting yet another decommissioning plan, specific to TFFF, is based on the provisions of 10 CFR 70.38 (g) (1) that state that a decommissioning plan must be submitted **if** the procedures and activities necessary to carry out decommissioning of a separate building have **not** been previously approved by the Commission. In GA's case, the procedures and activities necessary for decommissioning **have been** previously approved by the Commission. Further, GA will: 1) continue to use methods previously described and approved to identify and quantify the contamination and 2) follow procedures previously approved for conducting and documenting comprehensive detailed final surveys to demonstrate compliance with the previously approved (Refs. 1-7) criteria for release to unrestricted use.

Most notable among the relevant previous approvals by the Commission are the following:

1) GA's "Plan for Obtaining Release of Certain Areas to Unrestricted Use" dated October 1, 1985; approved by the Commission on November 26, 1985 (Ref. 1),

2) GA's "Plan for Obtaining Approval to Release Approximately 215 Acres from GA Technologies Inc. License SNM-696 to Unrestricted Use," dated December 15, 1986; approved February 1987 (Ref. 2).

3) GA's "SVA Decommissioning Plan," dated April 1, 1990 and revisions dated August 22, 1990 and April 14, 1992; approved by the Commission on November 13, 1990 and May 2, 1992 (Ref. 3).

4) GA's "Hot Cell Facility Decommissioning Plan," dated November 1995; approved by the Commission on May 1, 1996 (Ref. 4).

Following the procedures and activities necessary to carry out decommissioning described in the above plans, GA has decontaminated and obtained the release of the following to unrestricted use:

1) A former nuclear waste processing facility, including:
   - facilities for processing, solidifying and packaging waste
   - solar evaporation ponds
   - a radioactive waste incinerator
   - storage yards
   - soil remediation of hillside and canyon areas
   - underground storage wells,

2) Approximately 215 acres of undeveloped land,

3) A sewage pump station,

4) A sewage treatment facility, including:
   - concrete tanks and structures
   - digestors
   - solar evaporative ponds,

5) Eight groups of laboratories in Building 2 - each group was a separate project (a total of 109 laboratories have been released),

6) An experimental critical facility (Building 31-2),

7) An HTGR fuel process development pilot plant and process demonstration area of Building 9,

8) The portion of Building 9 where TRIGA fuel fabrication activities were conducted prior to circa 1975,

9) A large HTGR fuel manufacturing facility (SVA Facility); which included:
- removal of equipment and decontamination of building
- dismantlement of building
- removal of underground drain lines
- soil remediation, and

10) While not yet released, decommissioning of GA's hot cell facility is currently well underway.

The above listed projects have involved a broad spectrum of: radioactive contaminants, levels of contamination, as well as, contaminated media, equipment and facilities. Clearly, the procedure and activities required to conduct the decontamination of TFFF fall well within the envelop of experience associated with the numerous above described decontamination and decommissioning projects conducted pursuant to the various previously approved decommissioning plans.

If you have any questions regarding the above, please do not hesitate to contact me at (619) 455-2823.

Very truly yours,

Keith E. Asmussen

Dr. Keith E. Asmussen, Director
Licensing, Safety and Nuclear Compliance

References on page 4

cc: Mr. Frank A. Wenslawski, NRC Region IV / WCFO
Dr. Gerard Wong, State of California DOHS, Radiologic Health Branch

References:

1) "Plan for Obtaining Release of Certain Areas to Unrestricted Use," dated October 1, 1985. Transmitted to NRC by K. E. Asmussen Letter No. 696-8023 to Mr. W. T. Crow, dated October 1, 1985. **Approval:** NRC letter from W. T. Crow to GA Technologies, Inc / ATTN: Dr. Keith E. Asmussen, dated November 26, 1985.

2) "Plan for Obtaining Approval to Release Approximately 215 Acres from GA Technologies Inc. License SNM-696 to Unrestricted Use," dated December 15, 1986. Transmitted to NRC by K. E. Asmussen Letter No. 696-9096 to Mr. William T. Crow, dated December 15, 1986. **Approval:** In February 1987, GA (Keith E. Asmussen) was advised by Mr. Edward Shum of NRC/NMSS that, because of the similarities and identical release criteria, it could proceed with the implementation of the subject plan under the approval for the plan dated October 1, 1985,

3) "SVA Decommissioning Plan," dated April 1, 1990, and revisions dated August 22, 1990 and April 14, 1992.. The plan was transmitted to NRC by K. E. Asmussen Letter No. 696-1534 to Mr. Charles J. Haughney, dated March 30, 1990 and the revisions were transmitted to NRC by K. E. Asmussen Letter No.696-1612 to Mr. George H. Bidinger, dated August 24, 1990 and by K. E. Asmussen letter No. 696-1896 to Mr. John W. N. Hickey, dated April 14, 1992. **Approvals: 1)**NRC letter from Charles J. Haughney to General Atomics ATTN: Dr. Keith E. Asmussen dated November 13, 1990 (SNM-696 Amendment No. 16) and **2)** NRC letter from John W. N. Hickey to General Atomics, ATTN: Dr. Keith E. Asmussen, dated May 1, 1992 .

4) "Hot Cell Facility Decommissioning Plan," dated November 1995. Transmitted to NRC by K. E. Asmussen Letter No. 696-2497 to Mr. Robert C. Pierson, dated November 17, 1995. **Approvals: 1)** NRC letter from Robert C. Pierson to Dr. Keith E. Asmussen dated May 1, 1996 (SNM-696 Amendment No. 35) and **2)** NRC letter from Michael F. Weber to Dr. Keith E. Asmussen dated January 29, 1997.

5) Safety Condition S-16 of General Atomics' Special Nuclear Material License No. SNM-696 specifies the release of equipment, facilities or packages to unrestricted use shall be in accordance with "Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use or Termination of Licenses for Byproduct, Source, or Special Nuclear Material," dated April 1993.

6) Hickey, John W. N., letter to General Atomics, ATTN: Dr. Keith E. Asmussen, License No. SNM-696, Amendment No. 18 and associated Safety Evaluation Report, dated March 31, 1992. (References approved release criteria for uranium in soil and for release of equipment and facilities.)

7) Hickey, John W. N., letter to General Atomics, ATTN: Dr. Keith E. Asmussen, License No. SNM-696, Amendment No. 20 and associated Safety Evaluation Report, dated May 20, 1992. (References approved release criteria for uranium in soil and for release of equipment and facilities.)