



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

AUG 26 1994

MEMORANDUM FOR: Robert M. Bernero, Director
Office of Nuclear Material Safety
and Safeguards

FROM: Jack R. Goldberg
Deputy Assistant General Counsel
for Enforcement

SUBJECT: ADVANCED MEDICAL SYSTEMS, INC; 2.206 PETITION
BY THE NORTHEAST OHIO REGIONAL SEWER DISTRICT

Enclosed is a letter dated August 19, 1994, signed by William B. Schatz, General Counsel of the Northeast Ohio Regional Sewer District (NEORS), to James Taylor, Executive Director for Operations of the Nuclear Regulatory Commission (NRC). Petitioner requests that the NRC amend Advanced Medical System's (AMS's) License No. 34-19089-01 to require AMS to install, maintain, and operate a radiation alarm system on all drains at 1020 London Road, Cleveland, Ohio (AMS Facility) that lead to either sanitary or storm sewers.

The Petitioner asserts as the bases for this request that it views the quantity of cobalt-60 waste in the basement of the AMS facility as a major threat; that the NRC admits that the existing contamination at the AMS Facility continues to pose a risk; that the contamination that exists at the AMS Facility is estimated to be 393 curies of loose, "talcum-like" cobalt scattered upon the floor of the waste hold-up room in the basement; that cobalt-60 contamination was found in the sewer line connecting the AMS Facility to the public sewer and was found in the public sewer directly under the AMS discharge; that the NEORS has already incurred costs of nearly \$2 million addressing loose cobalt-60 contamination at its Easterly and Southerly Wastewater treatment plants; that the NRC has been unable or unwilling to explain the source of the cobalt-60 on the NEORS property and unable to identify any likely sources for the cobalt-60 other than the AMS Facility; that the quantity of cobalt-60 at the Southerly Plant exceeds that which the AMS records show was released by AMS into the sewer system; and that License Amendment No. 10 to the original license for this site, issued to Picker in 1962, contained a requirement for an alarm system to detect unmonitored discharges. The Petitioner states that such an alarm system was not a condition of the subsequent AMS license despite a recommendation from Oak

Contact: Michael Finkelstein
504-1688

130043

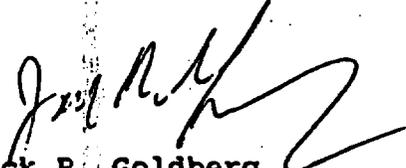
9412140034 940826
CF SUBJ
L-4-1PT2 206 CF

Handwritten initials and signatures, including "H/S" and "JFK" with a date "11".

Ridge Associated Universities that such an alarm system be installed along with control valves to shut off flow to the sewer if the alarm sounds.

I have enclosed drafts of a letter of acknowledgement to the Petitioner and a notice of Receipt of the Petition for publication in the Federal Register.

Please inform Michael Finkelstein of my staff as to the technical contact who will be involved in preparing a response to the Petition. Please ensure that I am provided copies of all correspondence related to the Petition and that I am asked to concur on all staff correspondence.


Jack R. Goldberg
Deputy Assistant General Counsel
for Enforcement

Enclosures:

1. Copy of Petition
2. Draft of Letter to Petitioner
3. Draft of Federal Register Notice

cc w/enclosures: K. Cyr, OGC
M. Malsch, OGC
S. Burns, OGC
W. Olmstead, OGC
L. Chandler, OGC
J. Martin, RIII
B. Berson, RIII

ACTION

EDO Principal Correspondence Control

FROM:

DUE: 09/06/94

EDO CONTROL: 0010395

DOC DT: 08/19/94

FINAL REPLY:

**William B. Schatz
Northeast Ohio Regional Sewer District**

TO:

James Taylor

FOR SIGNATURE OF :

**** GRN ****

CRC NO:

Bernero

DESC:

ROUTING:

**2.206 REQUEST FOR ACTION ON LICENSE #34-19089-01 -
ADVANCED MEDICAL SYSTEMS, INC.**

**Ltr only:
Taylor
Milhoan
Thompson
Blaha
Cyr, OGC
Russell, NRR
JMartin, RIII
JLieberman, OE**

DATE: 08/22/94

ASSIGNED TO:

CONTACT:

OGC

Cyr

SPECIAL INSTRUCTIONS OR REMARKS:

REF. EDO 9221

9404053