

DLD(SPO3)

From: <John.Volpe@mail.state.ky.us>
To: OWFN_DO.owf1_po(TJO)
Date: Tue, Nov 23, 1999 8:20 AM
Subject: RE: SP-99-074

Tom,

In regards to the six (6) questions we are awaiting NRC lead on clearance issues for solids. For soils we use the both the 25 mrem/yr and 15 mrem/yr release limit depending on the situation. If it is the Paducah Gaseous Diffusion Plant we assess ARARs and then use the 15 mrem/yr because it is a CERCLA site and the limit would be applicable whereas the 25 mrem/yr would be relevant and appropriate. For scrap metal at the Paducah Gaseous Diffusion Plant we expect the DOE to use appropriate release criteria developed by federal or international agencies.

1. In the interim we make decisions at scrapyards, landfills, etc. on a case by case basis. We have used and continue to use Reg. Guide 1.86 as guidance. We have a portable high purity germanium (HPGe) detector system which we use in the field to identify material and make release decisions, if possible. We also use a risk release criteria of 1E-4. We have the capability of use ResRad-Baseline, ResRad, and ResRad-Building.
2. Based on our statutes, we would be required to establish stds. through the regulatory process. Until NRC develops such stds., we will use 1.86 and other federal and international guidance.
3. We have not applied either MARSSIM or NUREG/CR-5849. In one instance at steel mill we used our portable HPGe and other survey equipment to conduct a direct evaluate of releases during cleanup. The areas where materials was stored from the cleanup of the mill were well defined and easily identified; therefore, there was no need for implementing a MARSSIM or NUREG/CR-5849.
4. As indicated we have the capability to utilize a portable HPGe in the field; therefore, we can required cleanup to ALARA without sampling being sent to a fixed based laboratory. In addition, we use the resrad family of codes to make decisions.
5. Release criteria is not zero; however, NRC must remember that steel mills have a zero tolerance for rad contaminated scrap, etc.
6. No licensees currently have volumetric release authorization.

If you need additional information, feel free to contact me.

John Volpe

-----Original Message-----

From: Thomas O'Brien [mailto:TJO@nrc.gov]
Sent: Monday, November 22, 1999 4:32 PM
To: John.Volpe@mail.state.ky.us
Subject: Re: SP-99-074

11-23-99

SP-A-4

SP-AG-11 60
NRC FILE CENTER

John-

Thanks for your initial response. Will you be providing any further information with respect to Kentucky's release standards, if any, used for solid material containing byproduct material and to the 6 questions contained in SP-99-074 ?

Thanks,

Tom O'Brien
Office of State Programs
USNRC
301-415-2308
tjo@nrc.gov

>>> <John.Volpe@mail.state.ky.us> 11/08 9:05 AM >>>
Tom,

Kentucky has definition for the following which can be found in the following regulations:

902 KAR 100:022. Licensing requirements for land disposal of radioactive waste
Disposal
Waste by-product material

902 KAR 100:010. Definitions
by-product material
disposal
low-level radioactive waste
waste

These definitions can be downloaded from the regulations posted on the Kentucky legislature home page at <http://www.lrc.state.ky.us/home.htm>.

If you have questions, feel free to contact radiation staff at (502) 564-3700.

John A. Volpe, Ph.D., Manager
Kentucky Radiation Health and Toxic Agents Branch

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