

Duane Schmidt

From: Duane Schmidt
Sent: Wednesday, January 18, 2006 10:05 AM
To: Dominick Orlando
Cc: Duane Schmidt
Subject: Re: [Heritage] Fwd: Request for Concurrence on Attached Documents

Nick,

After my quick look, I have the following observations:

(1) The inspection report does not really describe the purpose of the sampling that NRC performed. The problem with this is that a reader can then make up the purpose, or guess what the purpose was. And the purpose could have been (a) to determine the performance of the licensee in analyzing soil samples; (b) to find and analyze the hottest remaining concentrations (the report, page 4, indicated "side-by-side, biased sampling;" (c) to determine if the soils meet the termination criteria, or (d) some other purpose. Without more information, and without reviewing the final status survey report, it is impossible for this reader to determine what the purpose was.

(2) If the purpose was (a), a comparison of the results seems to indicate the licensee performs poorly at analyzing samples for thorium (they appear biased low) and uranium (they appear biased high).

(3) if the purpose was (b), it is unclear why.

(4) If the purpose was (c), the NRC staff may be doing the licensee's job. This is a bad situation to be in, especially for a contentious site.

(5) On page 8 of the report, the sample that had a result of > 10 pCi/g Th was discussed. NRC staff concluded that the result was okay, in part "Based on the agreement between the remaining samples,..." [emphasis added] The results for the remaining samples do NOT appear to show agreement between NRC results and Enercon results! It seems that this NRC staff conclusion could be challenged.

(6) As you indicated (I think), there is a lot of information in this "inspection report" that has nothing to do with an inspection--things that should be in the SER and/or Commission paper. Examples include pages 8 and 9 (probably others).

Nick, I would agree that this report should be carefully reviewed by us before Dan concurs. As appropriate, we should suggest changes to the Region. I suggest that one of our DCD HPs be involved, because this is a survey issue, not really a dose modeling issue.

Duane.

>>> Dominick Orlando 1/18/2006 6:56:57 AM >>>