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Nuclear Fuel Services, Inc. ERWIN, TENNESSEE 37650

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(615) 743-9141

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> March 2, 1981 U.S. HUCLEAR REG. COMMISSION 35 MAIL SECTION

Division of Fuel Cycle and Material Safety U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Attention:

Mr. R. G. Page, Chief

Uranium Fuel Licensing Branch

Reference:

Docket 70-143; SNM License 124

License Amendment No. 6 dated May 15, 1980

Gentlemen:

NFS is enclosing recent stack release data and an evaluation of potential off-site radiation exposure as Attachment I to this letter. Based upon the measured data at the nearest residence, the potential infant dose commitment does not exceed 2.8 mrem. per year, or 11% of EPA guidelines.

Attachment II is a projected schedule for ventilation upgrade which would be required to provide assurance of continual compliance with a 25 mrem. per year limit. This schedule is based upon both quoted and NFS experience. The engineering phases are developed from quotations from Lockwood-Green Engineering Company and Science Applications, Inc. Sampling, testing, and analyses have been initiated and the procurement and installation phases are supported by NFS experience. The projected completion date is December 31, 1982.

If you have any questions, please contact me.

Very truly yours,

General Manager

WCM: kj

Attachment

cc: Director, Region II

ATTACHMENT I

PRELIMINARY STATUS REPORT ENVIRONMENTAL AIR SAMPLING

(AS REQUIRED BY AMENDMENT 6; SNM-124, DATED May 15, 1980)

I. STACK 234U* CONCENTRATIONS (Condition No. 61)

The following stack concentrations (total alpha) have been measured since December 1, 1980. Units = $\mu \text{Ci/ml}$ × 10^{-12}

•		Building 233	В	uilding 302/3
Date	Daily	Weekly Average	Daily	Weekly Average
12/1/81	48	84	90	100
12/2/81	7	74	240	127
12/3/81	41	70	126	133
12/4/81	72	72	105	121
12/5/81	103	73	35	117
12/6/81	58	66	17	112
12/7/81	3	47	41	94
12/8/81	21	44	623	170
12/9/81	52	50	189	163
12/10/81	46	51	114	161
12/11/81	48	47	187	173
12/12/81	8	34	92	180
12/13/81	117	42	60	186
12/14/81	39	47	44	187
12/15/81	156	67	51	105
12/16/81	58	67	84	90
12/17/81	27	64	107	89
12/18/81	42	63	55	70
12/19/81	3	63	28	62
12/20/81	7	47	17	55
12/21/81	8	43	. 11	50
12/22/81	23	24	- 28	47
12/23/81	5	16	11	37
12/24/81	58	21	5	23
12/25/81	30	19	12	16
12/26/81	15	21	5	15
12/27/81	16	22	29	16
12/28/81	4	22	22	118
12/29/81	42	24	45	18
12/30/81	24	27	90	29
12/31/81	68	28	79	40

Building 233

Building 302/3

Date	Daily	Weekly Running Avg.	Daily	Weekly Running Avg.
1/1/81	37	26	87	51
1/2/81	100	38	56	59
1/3/81	37	40	58	64
1/4/81	6	41	46	67
1/5/81	155	57	7	62 ·
1/5/81	17	56	28	53
1/7/81	43	52	23	45
1/8/81	. 82	59	10	34
1/9/81	20	51	23	28
1/10/81	18	48	18	22
1/11/81	52	56	14	17
1/12/81	7	34	7	17
1/13/81	57	39	45	. 20
1/14/81	144	54	17	19
1/15/81	29	47	43	24
1/16/81	15	46	86	33
1/17/81	15	46	17	33
1/18/81	11	40	36	36
1/19/81	4	39	1	35
1/20/81	15	33	20	31
1/21/81	58	21	10	30
1/22/81	75	27	15	27
1/23/81	14	27	47	21
1/24/81	22	29	12	20
1/25/81	114	43	20	18
1/26/81	16	45	32	. 22
1/27/81	5	43	22	22
1/28/81	7	37	98	35
1/29/81	б	27	29	. 38
		•		

Building 233				Building 302/3		
	Daily	Weekly Running Avg.		Daily	Weekly Running Avg.	
1/30/81	7	25	*:	47	37	
1/31/81	9	23		16	38	
2/1/81	6	8	•	37	40	
2/2/81	8	. 7		9.	37	
2/3/81	8	7		- 6	35	
2/4/81	22	9		6	21	
2/5/81	37	14		5	18	
2/6/81	3	13		20	14	
2/7/81	124	31		14	14	
2/8/81	8	30		26	12	
2/9/81	3	29		60	20	
2/10/81	13	30		12	21	
2/11/81	1	27		17	22	
2/12/81	4	22		29	26	
2/13/81	19	24		32	27	
2/14/81	161	29		79	36	
2/15/81	9	30		12	35	
2/16/81	1	29		46	32	
2/17/81	2	28		25	34	
2/18/81	.]	28		24	35	
2/19/81	j .	27		21	34	
2/20/81	13	27		16	32	
2/21/81	55	12		22	24	
2/22/81	282*	50		47	28	
2/23/81	9	52		71	33	
2/24/81 2/25/81	723 [*] 26	155 159		37 38	34 36	

^{*}Under Investigation.

^{*}All alpha activity assumed to be 234U

II.. ISOTOPIC ANALYSIS - URANIUM (Amendment 62)
MONTHLY ISOTOPIC ANALYSIS (1980)

Perimeter and Environmental Air Uranium Isotopic Concentration

Units = μCi/ml x 10⁻¹⁴

Sample	Month	2340	<u>235U</u>	<u>238U</u>	Total
170	June	2.8	0.2	0.1	3.2
NNE	July	3.3	0.3	0.1	3.7
Perimeter	Aug.	3.6	0.9	0.4	4.9
•	Sept.	5.8	0.1	0.1	6.0
	Oct.	3.0	0.1	0.0	3.1.
Sample	Month	234U	235U	<u>238U</u>	Total
171	June	2.6	0.1	0.2	2.9
NW	July	2.1	0.1	0.0	2.2
Perimeter	Aug.	2.5	0.1	0.4	2.9
	Sept.	2.5	0.1	0.0	2.6
	Oct.	0.9	0.1	0.0	1.0
Sample	Month	<u>234U</u>	2350	<u>238U</u>	Total
172	June	2.1	0.0	0.0	2.2
, SW	July	1.2	0.0	0.0	1.3
Perimeter	Aug.	6.9	0.1	0.0	7.1
	Sept.	1.1	0.0	0.0	1.2
•	Oct.	6.2	0.2	1.0	7.3
Sample	Month	<u>234U</u>	· <u>235U</u>	<u>238U</u>	Total
173	June	2.8	0.1	0.0	2.9
ENE	July	2.9	0.1	0.0	3.0
Perimeter	Aug.	2.3	0.0	0.0	2.4
	Sept.	3.3	0.1	0.1	3.5
	Oct.	2.1	0.1	0.0	2.2
<u>Sample</u>	<u>Month</u>	<u>234U</u>	<u>235U</u>	<u>238U</u>	Total
174	June	3.2	0.2	0.1	3.4
SE	July	2.9	0.1	0.0	3.0
Perimeter	Aug.	2.5	0.1	0.1	2.6
	Sept.	2.5	0.1	0.1	2.7
	Oct.	1.0	0.0	0.0	1.0
Sample	Month	<u>234U</u>	<u>235U</u>	<u>238U</u>	Total
217	June	2.2	0.0	0.0	2.2
ENE	July	1.4	0.1	0.0	1.5

<u>Sample</u>	Month	<u>234U</u>	<u>235U</u>	<u>238U</u>	<u>Total</u>
Perimeter	Aug.	2.0	-0.1	0.0	2.0
	Sept.	2.5	0.1	0.0	2.6
	Oct.	2.0	0.1	0.0	2.0
Sample	<u>Month</u>	<u>234U</u>	<u>235U</u>	238U	Total
218	June	2.8	0.4	0.3	3.4
SE	July	6.5	0.2	0.1	6.7
Perimeter	Aug.	5.3	0.5	0.7	6.5
	Sept.	5.1	0.2	0.3	5.6
	Oct.	40	0.1	0.1	4.1
<u>Sample</u>	Month	<u>234U</u>	<u>235U</u>	<u>238U</u>	Total
322	June	1.0	0.0	0.0	1:.0
600 meters	July	1.0	0.0	0.0	1.0
NE of	Aug.	0.7	0.0	0.0	0.7
Plant	Sept.	0.8	0.0	0.0	0.9
	Oct.	1.0	0.1	0.0	1.2
<u>Sample</u>	Month	<u>234U</u>	<u>235U</u>	<u>238U</u>	Total
323	June	1.9	0.0	0.0	1.9
290 meters	July	1.5	0.0	0.0	1.6
E of	Aug.	0.7	0.0	0.0	0.7
Plant	Sept.	1.6	0.0	0.0	1.6
	Oct.	3.5	0.1	0.0	3.6
<u>Sample</u>	Month	<u>234U</u>	<u>235U</u>	<u>238U</u>	Total
324	June	0.3	0.0	0.0	0.3
8 km .	July	0.1	0.0	0.0	0.2
SW of	Aug.	0.1	0.0	0.0	0.1
Plant	Sept.	0.1	0.0	0.0	0.1
	Oct.	0.1	0.0	0.0	0.1

^{0.0} indicates less than 0.5 x $10^{-3.5} \mu \text{Ci/ml}$

III. Uranium Solubility (Condition No. 63)

Samples collected during the last two quarters of 1980 have been collected and sent to BNWL for solubility determinations. These analyses have not yet been completed and the preliminary results (identifying the Class D fraction) will probably not be available until early March.

Although the purpose of this test is not to quantitively measure uranium, 200 µ grams of uranium were collected in the presence of 9.7 grams of total particulate during the last quarter of 1980. This represents a concentration of approximately 1.4 x 10^{-6} µg/1. Since the specific activity is not known, no statment can be made relative to the radioactivity concentration. When preliminary data on solubility become available, BNWL will telephone results to NFS.

IV. Particle Size Distribution (Condtion No. 64)

Three quarterly air samples (of one week duration) using multi-stage cascade impactor (Anderson 2000), in which particles are aerodynamically fractionated into five ranges and the respirable fraction can be estimated. have been made. These data are presented below:

Particle Size Distribution

(Carolina Ave. Sampling Station)
Sample No. 323 Concentrations(µCi/ml x 10⁻¹⁴) ICRP Resp. (%)*-R_f August, 1980 December, 1980 January, 1981 Stage 1 (>7µ) 6% 1.3 (17.1%) 0.8 (10.1%) 0.5 (14.3%) 0.7(20.0%)Stage 2(3.3-7 µ) 0.9 (11.4%) 11% 1.0 (13.2%) 0.6 (17.1%) Stage 3(2.3-3 \(\text{1} \) 1.0 (13.2%) 1.0 (12.7%) 20% 1.0 (13.1%) 1.2 (15.2%) 0.5 (14.3%)Stage 4(1.1-2 u) 22% 4.0 (50.6%) 1.2 (34.3%) Stage 5(0.1-1.1 µ) 3.3 (43.4%) 45% 3.57.9 7.6

25.1% R_{f} (.01)(%) Percent Respirable 30.5%

Total

^{*}ICRP Pub. 30, 1978

Environmental Air

Total Alpha Concentrations (Near Residents)

January, February, 1981 Units - μ Ci/ml x 10-14

Sample No. 323	Week Ending	<u>Total Alpha</u>
290 meters	1/5/81	1.6
E of Plant	1/12/81	2.5
	1/19/81	2.1
	1/26/81	1.4
	2/2/81	3.3
	2/9/81	0.8
	2/16/81	2.1
Sample No. 372	Week Ending	<u> Total Alpha</u>
240 meters	1/5/81	2.7
SSE of	1/12/81	2.4
Plant	1/19/81	2.4
(nearest Resident)	1/26/81	2.1
(11007000110070101107)	2/2/81	2.1
	2/9/81	1.4
·	2/16/81	2.8

V. Dose Commitment Estimate - Nearest Resident (Condition No. 65)

Assumptions:

Exposed Individual is an infant

100% soluble with bone as critical organ

Respirable Fraction = 0.27

All Alpha Activity from 234U

NUREG - 0172 Dose Commitment Factors Used

Avg. Alpha Conc. = $2.3 \times 10^{-14} \mu \text{Ci/ml} = 2.3 \times 10^{-8} \mu \text{Ci/M}^3$

Infant Breathing Rate = 2045 M³/yr

Dose Commitment - Bone (Class D)

Adult Dose Commitment:

 $(7300 \text{ M}^3/\text{yr}) (0.27) (2.3 \times 10^{-8} \mu \text{Ci/M}^3) (41.2 \text{ rem/}\mu \text{Ci}) = 1.9/\text{mrem}$

Infant Dose = (0.0019 (1.5) = 0.0028 rem = 2.8 mrem

VENTILATION UPGRADE SCHEDULE

JFMAMJJASOND JFMAMJJASOND Phase I Engineering (Testing & Analysis) Phase II Engineering (Process Ventilation Design) Phase III Engineering (Building Ventilation Design) Installation

A - Quotation

B - Engineering Design C - Award Contract

D - Equipment Delivery

E - Construction

F - Check-out & Start-up