COMMUNICATIONS DISTRIBUTION TO FORMER SITES RESTORATION DIV (EW-93) PROCESSED BY PDCC 2/1/192

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PLEASE RETURN TO POCC FOR CORRECTIONS



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

JACOB K. JAVITS FEDERAL BUILDING NEW YORK, NEW YORK 10278

## AUG 1 0 1992

Mr. Ronald E. Kirk, Site Manager Former Sites Restoration Division U.S. Department of Energy Oak Ridge Operations P.O. Box 2001 Oak Ridge, Tennessee 37831-8723

Dear Mr. Kirk:

The purpose of this letter is twofold: 1) to inform you of the results of the radionuclide NESHAPS inspection performed at Niagara Falls Storage Site (NFSS) on June 24, 1992 by Ms. Jennifer Magruder of the Environmental Protection Agency (EPA) and; 2) to provide written comments on your submittal of NESHAPS calculations (May 27, 1992) for NFSS to determine the applicability of Subpart H on this facility. A discussion of these calculations was held during the inspection and the comments were provided to you verbally.

Ms. Magruder conducted an inspection of NFSS on Wednesday, June 24, 1992 to determine compliance with 40 CFR 61, Subparts H and Q for radionuclide NESHAPs. Accompanying Ms. Magruder on this inspection as an observer was Mr. William Varcasio of the New York State Department of Environmental Conservation, Bureau of Radiation (DEC). The DEC was recently awarded a grant from the EPA to devel p a radionuclide NESHAPs program in preparation for accepting delegated authority for the implementation and enforcement of this program. The DEC's authority under this program would only extend to subpart H facilities.

The inspection consisted of five components: 1) an opening meeting between all key personnel; 2) viewing of a video tape on NFSS history and status; 3) a physical tour of the site; 4) a review of pertine: cocumentation and; 5) period for discussion, questions, and answers. Based on the results of the inspection, the EPA has determined that NFSS is in full compliance with 40 CFR 61 Subpart Q for radionuclide NESHAPs. The applicability of the use of, and/or compliance with, Subpart H at NFSS will be determined by the revised computation of the effective dose equivalent rate using the comments and recommendations discussed during the inspection and in this letter.

One issue that came up during the inspection concerned the addition of federal, state and local emergency nctification numbers to NFSS's emergency response plan. In a letter dated 9/5/91 from Mr. William Seay to myself, it was stated that these numbers would be added to both the NFSS and Middlesex Sampling Plant plans. As of 6/23/92, this had not been done. These numbers should be added by January, 1993 and copies should be provided to this office. During the inspection, Ms. Magruder also requested a copy of NFSS's Health and Safety Plan and was told that this would be sent to EPA's Region II office.

action Required

During the question and answer period a discussion was held on the submittal of NESHAPs calculations of the effective dose equivalent (EDE) rate at NFSS to determine the applicability of Subpart H on this facility. At this time EPA's comments and recommendations were informally presented to you. These comments are as follows:

- The intended objective is to determine the radium (Ra) escape from the storage pile. The known quantities are:
  - 1) the amount of radium entombed
  - 2) therefore, the amount of radon generated is known
  - 3) the radon escape (20,234 pCi/s)

By using the following factors, the radium escape should be able to be calculated:

- 1) the amount of radium entombed
- 2) surface area of storage pile (10 acres?)
- 3) the same escape rate as radon
- 4) a conversion factor which would take into account that solid travels much slower than gas
- At the bottom of sheet number 4 (calculations sheets) the assum; ion that only 0.001% of the radium generated makes it to the clay cap is made. The basis for this assumption should be stated.
- On sheet number 6, the area source is being defined as  $44,516 \text{ m}^2$  while on sheet number 4 it appears to be defined as  $40,460 \text{ m}^2$ .
- On sheet nu her 6, where the on-site radiological concentrations are listed; the value for radium (5,948 Ci/g) should be checked in comparison to the 2,088 Ci/g of Ra given on sheet 4. (It should be noted that the K65 value is much higher. Do not dilute with soil outside of the containment cell.)
- In the summary of results it is stated that "the area source used to calculate the particulate release rates at NFSS consists of the total contaminated on-site grass

surfaces. This statement is incorrect for the intended purposes of these calculations. The concern here lies only with the grass surfaces from the zone above the cell, not the total contaminated on-site grass surfaces.

If you have any further questions regarding the 1992 radionuclide NESHAPS inspection or our comments on the EDE calculations for Subpart H, please contact Jennifer Magruder of my office at (212) 264-4536.

Sincerely,

Mih (Buepotie for H)C.
Paul A. Giardina, Chief
Radiation Branch

cc: Robert Hargrove, OPM-EIB
Jennifer Magruder, AWM-RAD
Dr. Paul Merges, NYSDEC
William Varcasio, NYSDEC