



INTERSTATE NUCLEAR SERVICES
A SUBSIDIARY OF UNIFIRST CORPORATION

DL-030999_02

March 9, 1999

Mr. Bryan Parker
US Nuclear Regulatory Commission, Region II
101 Marietta Street, Suite 2900
Atlanta, GA 30323-0199

RE: Decommissioning Plan Amendment Request: License 20-25222-01

Dear Mr. Parker:

The decommissioning project as described in INS' decommissioning plan, as amended and approved, has proceeded smoothly with two exceptions. These situations and the planned resolution are explained in the following paragraphs. INS is seeking amendment of the decommissioning plan to include the actions as detailed to permit full release of the site for unrestricted use. The implementation of the proposed actions will result in full compliance with NRC decommissioning guidelines.

First, contamination has been identified in soil and concrete block along a portion of the washroom perimeter wall. The source of contamination is believed to be exposure to water from the washroom floor which seeped down along the expansion joint between the floor and the exterior wall. This issue was subject of previous telephone conversations between the NRC and INS and remedial actions were taken as determined within the scope of the current approved decommissioning plan. Approximately two-thirds of the washroom floor was removed in its entirety to facilitate excavation around the perimeter footing. Additional excavation occurred on the outside wall of the building as investigation indicated that contamination had migrated through the block wall into a limited volume of soil adjacent to the foundation. At this time, all identified soil contamination has been removed. However, fixed contamination exists on and in the lower two courses of concrete block. INS proposes to demolish the rear section of the washroom. Portions of the building that have been determined to meet release criteria will be destined for a municipal landfill. Portions of the building that do not meet release criteria (principally, the lower two courses of block and footer surfaces) will be disposed of as low-level radioactive waste. Although INS could conceivably present information that the block and footers could be left in place while meeting NRC decommissioning criteria, INS has conservatively decided to remove residual contamination as identified. As the scope of these demolition activities may be beyond the scope initially proposed, INS is providing this information prior to undertaking the planned activities and seeks NRC approval of the same.

Second, natural ground water levels are significantly higher than expected and have complicated removal of the primary waste water accumulation pit. During an investigation, the water level outside of the pit was approximately 5 feet above the bottom of the pit and about 3 feet below the top of the pit (floor level). Initial assays of this water, as well as soil samples taken around the pit, have indicated no detectable activity above natural background levels. In order to allow for removal of the pit, INS proposes to excavate soil from around the pit and to pump the natural ground water infiltrating from the soil surrounding the pit to the ground surface in the rear of the property and/or nearby drainage culverts on INS property. As a conservative precaution, INS will first pump the water to a hold-up tank and sample for gross alpha and beta/gamma activity prior to discharge. Release criteria will be based on gamma spectroscopy results and ensuring that the sum-of-the-ratios does not exceed unity. The sum-of-the-ratios will be determined by adding all quotients for each identified nuclide. Each quotient will be determined by dividing the concentration of each nuclide in the sample above background by the appropriate value specified in 10 CFR 20, Appendix B, Table 2, Column 2. In the unlikely event that release criteria is exceeded, the water may be selectively filtered and re-sampled until release criteria is achieved.

I have also included a 1.44 MB computer diskette containing recent pictures of the facility indicating its current status. Please do not hesitate to contact this office if you have any questions regarding any of the information presented. Thank you for your assistance.

Sincerely,



Glenn Roberts
Health Physicist/Decommissioning RSO
INS Corporation

Attachment: Washroom Drawing
Diskette

INTERSTATE NUCLEAR SERVICES PORTSMOUTH, VIRGINIA



Proposed area of demolition. Includes exterior walls and roof. This area also already has the concrete floor removed. The trenches extending from the pit (in red) have also been removed. Only the pit remains.



Approximate area of foundation with limited fixed contamination

