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STATE OF WASHINGTON

AIR 96-706

DEPARTMENT OF HEALTH
DIVISION OF RADIATION PROTECTION

Airustrial Center, Bldg. 5 • P.O. Box 47827 • Olympia, Washington 98504-7827

July 11, 1996

Mr. James E. Rasmussen, Director
U. S. Department of Energy
Environmental Assurance,
Permits and Policy Division
Richland Operations Office
P. O. Box 550 MSIN A 5-15
Richland, Washington 99352

Dear Mr. Rasmussen:

On June 10, 1996, the Department of Health conducted an inspection to verify compliance with the Portable and Temporary Radioactive Air Emission Units (PTRAEU) Notice of Construction (NOC). The inspections were performed at K Basins, N Reactor, B Plant, PUREX, 222-S Laboratories, Mobile Sample Laboratories and the 300 Area. As a result of this inspection, the department determined that the new PTRAEU NOC must clearly state that periodic confirmatory monitoring is required and all contractors must adhere to the NOC consistently. The inspection resulted in one Notice of Correction (NoC), which is enclosed. The Department of Health requires a written response by September 16, 1996.

If you have any questions, please contact me at (360) 586-0254 or John Martell of my staff at (509) 377-3898.

Sincerely,
Randy Conklin for

Allen W. Conklin, Head
Air Emissions and Defense Waste Section
Division of Radiation Protection

AWC/JM/jr

Enclosure

cc: Steve Szendre, WHC



INSPECTION

Field Dates: 10-Jun-96 to 10-Jun-96

Location: Portable Emissions Units

Audit Number: 68

Area of Concern: NOC Verification

Date Response Required:

Letter Number:

Participants: Steve Carrick
John Martell

Comments:

Notice of Correction : Failure to comply fully with the conditions of the Radioactive Air Emissions Notice of Construction(NOC) for Portable and Temporary Radioactive Air Emissions Units

REGULATORY BASIS: WAC 246-247-060(8)

Discussion:

On June 10, 1996 the Department of Health conducted an inspection to verify compliance with the conditions outlined in the NOC for Portable and Temporary Radioactive Air Emission Units(PTRAEU)(RL 94-PCA-032). Section 4.2 of the NOC states "When implementing a PTRAEU... the operator shall determine the following: Emission Estimates (this information should include assumptions and methodology used to determine the estimate. The Data should be maintained by the operator and indicate project specific operation)." When these emissions estimates were requested for type II and type III mobile labs, DOH personnel were told this information was not available. Laboratory personnel further stated emissions are limited by the dose rate on the material entering the mobile lab.

Desired Actions:

Develop and document emission estimates for the type II and III mobile sample labs as required in Section 4.2 of the NOC
