



101174



LTSM012609

1993 FEB 29 PM 1:42

County of Erie

DENNIS T. GORSKI
COUNTY EXECUTIVE

DEPARTMENT OF ENVIRONMENT AND PLANNING

RICHARD M. TOBE
COMMISSIONER

February 25, 1993

MICHAEL RAAB
DEPUTY COMMISSIONER
ENVIRONMENTAL COMPLIANCE SERVICES

U.S. Department of Energy
Oak Ridge Field Office
P.O. Box 2001
Oak Ridge, Tennessee 37831

Attn: Ronald E. Kirk, P.E.

- Re:
- Radiological Survey of the Former Bliss and Laughlin Steel Company Facility, Buffalo, NY
 - Results of the Radiological Survey at the Town of Tonawanda Landfill, Tonawanda, NY

Dear Mr. Kirk:

On behalf of the CANIT committee, please find herewith one copy of Dr. Martin Haas' comments to the above referenced documents for your review. We would appreciate your response regarding the comments at your convenience.

Should you have any questions or require additional information, please contact us at (716) 858-6370.

Very truly yours,

MARY L. SONNTAG
Assistant Env. Quality Engineer

MLS:jk
Enclosure

cc: Dr. Martin Haas
Michael Raab

Comments on ORISE 92/G-6

Martin N. Haas
PhD, PE, CSP, CIH, CHP

The following comments on ORISE 92/G-6, "Radiological Survey of the Former Bliss and Laughlin Steel Company Facility Buffalo, New York", are noted as follows:

Page 3 The fact that there exist utility trenches in the area suggest that drains may lead from the same trenches. A further note on the same page indicates no drains in the area. Nonetheless, investigation of drains and traps leading from the building should be considered for possible past releases of activity.

Page 5 The readings and locations of PIC (Pressurized Ion Chamber) measurements should be documented.

Note that the use of DOE Guidelines for this work differs from what may apply for licensed facility cleanup standards.

Page 7 The use of a derived guideline should be thoroughly documented. It is my understanding that this will be generated using the RESRAD program. This differs from the application of cleanup standard for a licensed facility.

Pages 15-17 Threshold levels for surface beta activity (dpm/100cm²) differ in Tables 1 and 2. The basis for difference should be noted.

Page 18 The footnote in Table 3 refers to Figure 5 for sampling locations, however, locations 3 through 6 are not contained in Figure 5.

The positive findings for radioactivity in dust on area beams in the only two samples in suggestive of a previous airborne contamination problem. This should be further evaluated given the ramifications of this issue.

Sample preparation and protocol should be described.

Page B-2 The basis for using 4-pi rather than 2-pi efficiency for surface beta activity should be noted.

Documentation of PIC data should be noted.

Comments on ORNL/RASA-92/11

Martin N. Haas
PhD, PE, CSP, CIH, CHP

The following comments on ORNL/RASA-92/11, "Results of the Radiological Survey at the Town of Tonawanda Landfill, Tonawanda, New York", are noted as follows:

Page xi A factor of 30 above Guideline values is noted in the abstract. Values in Table 3 actually indicate factors in excess of 400 above Guideline values for individual data. This is about the same type of observation that was indicated in the past for ^{241}Am contamination in the same landfill. The latter resulted in an extensive survey and detailed study followed by a substantial remediation effort.

Page 2 Data to support the PIC (Pressurized Ion Chamber) levels should be documented. This should include location, normalization, etc.

Page 19 A derived concentration Guideline of 60 pCi/gm is noted in Table 1. Based upon similar DOE surveys, it is likely that this value was derived from application of the RESRAD program. The input and output for this calculation should be described and provided in order to allow an independent check on the basis and assumptions used.

A Guideline radiation level of 20 microR/hr is proposed that is consistent with an annual exposure of 100 mR. This works out to be 5000 hours of exposure time. The "appropriate use" scenario used should be described to support this value.

Note that the use of DOE Guidelines for this work differs from what may apply for licensed facility cleanup standards.