

DEPARTMENT OF HEALTH  
Office of Radiation Protection

September 13, 2013

TO: Rod Lobos  
U.S. Environmental Protection Agency (USEPA)

FROM: Randy Utley *RU*  
Radioactive Air Emission Section (RAES)

SUBJECT: WDOH Response for Transition of the Cold Vacuum Drying Facility (CVDF) to CERCLA Regulation and the Removal of the Emission Unit from the USDOE FF-01 Radioactive Air Emission License

Reference 1: *Removal Action Work Plan for 105-KE/105-KW Reactor Facilities and Ancillary Facilities*

RAES has completed a review of the referenced document in relation to the removal of the CVDF from the USDOE FF-01 license and transition to the CERCLA regulations. The review concentrated on the remaining radiological inventory, the adequacy of abatement controls, and the adequacy of the monitoring of the remaining radiological material at the CVDF. RAES understands that the CVDF mission has been completed and will be used as an operations/maintenance location supporting CERCLA activities until D4 activities are started. With the interim mission as an operation/maintenance location RAES places emphasis on the following requirements that are stated in the Air Monitoring Plan that is attached to the referenced document.

- The PTE at CVDF has been reduced below 0.1 mrem to the Maximally Exposed Individual. With the reduction in PTE periodic confirmatory monitoring is required until demolition of the facility. This will be accomplished with one sample per month. The sample will be analyzed for each radionuclide that could contribute greater than 10 percent of the potential to emit of the TEDE.
- The existing ambient air monitor network in the 100K area will continue to operate and monitor diffuse and fugitive emissions under the Environmental Surveillance Program or the Near-Facility Monitoring Program.
- The CVDF ventilation system will continue to operate until demolition of the facility. This will include operation of the abatement controls (HEPA filters). With the reduction in PTE, HEPA filter efficiency testing can be conducted every 3 years instead of once a year.

\* Resp. to IM# 7,711

Eu 436  
NOC 836

RAES will respond to USDOE's Notice of Transition and will remove the CVDF from the FF-01 license on the next update of the license. RAES appreciates the opportunity to review the work plan prior to the transition to CERCLA regulation. Please contact Randy Utley at (509) 946-0534 if you have any questions.

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