

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Nickel-63 Radiological Response - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region II

**Subject:** POLREP #4  
Nickel-63 Radiological Response  
  
Guaynabo, PR  
Latitude: 18.4439396 Longitude: -66.1129342

**To:**  
**From:** Eric M. Daly/Geoff Garrison, On-Scene Coordinators  
**Date:** 3/5/2010  
**Reporting Period:** 02/25/10-03/04/10

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	<b>Contract Number:</b>
<b>D.O. Number:</b>	<b>Action Memo Date:</b>
<b>Response Authority:</b> CERCLA	<b>Response Type:</b> Emergency
<b>Response Lead:</b> EPA	<b>Incident Category:</b>
<b>NPL Status:</b>	<b>Operable Unit:</b>
<b>Mobilization Date:</b>	<b>Start Date:</b>
<b>Demob Date:</b>	<b>Completion Date:</b>
<b>CERCLIS ID:</b>	<b>RCRIS ID:</b>
<b>ERNS No.:</b>	<b>State Notification:</b>
<b>FPN#:</b>	<b>Reimbursable Account #:</b>

**1.1.1 Incident Category**  
Radiological Assessment

**1.1.2 Site Description**  
Storage Facility

**1.1.2.1 Location**  
Guayanabo, Puerto Rico

**1.1.2.2 Description of Threat**  
Instruments containing sealed Nickel-63 Sources

**1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**  
Pending

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

On February 24, 2010, EQB provided a written referral to EPA to oversee this removal. The NRC does not have the mechanism to oversee a removal and therefore will coordinate with EPA throughout this process. Puerto Rico Department of Health Director of Radiological Health Division was also contacted and provided the current information.

On February 25, 2010, a meeting with EPA, NRC, EQB, Departamento De Corrección, and Puerto Rico Department of Health was held to discuss the next steps (Inventory of all units, leak testing all units, transportation of units to the secured location in Guaynabo, work plan, safety plan). NRC explained what a General License was and explained specifically how it pertained to Smith Detection in this case. Some highlights would be Quarterly Reporting to NRC and tracking of the General License Products. It was also verified that the spill stain on the cardboard box during relocation of IonScan units was not from the Ni-63 source. It may not even have been from the pump unit. There is no more of a radiological risk from the units near that spill than the other units.

The group discussed next steps:

- 1) Departamento De Corrección will determine the number and location of all the units containing the Ni-63 source. A Departamento De Corrección Liaison has been

identified to specifically handle this task. All paperwork affiliated with these units will be compiled by Departamento De Corrección.

- 2) Once the number of units that need to be recycled/disposed is determined, leak test kits will need to be purchased by the Potentially Responsible Parties (PRP).
- 3) EPA has offered to provide training to Departamento De Corrección Personnel in order to perform the leak test.
- 4) A Work Plan will be developed by EPA and NRC which will include procedures, health/safety steps, and use of Personal Protection Equipment (PPE) in order for Departamento De Corrección Personnel to perform the leak test, serial number inventory, and eventual shipment of the Ni-63 Units.

**Outstanding Issues:**

- 1) Identify all Potentially Responsible Parties (PRP).
- 2) Are the IonScan 400 and IonScan 400A units obsolete? (Question to be answered by Smith Detection)
- 3) There was an inventory taken of the IonScan units separated from the "spill units" prior to the agencies being notified. This inventory list was scanned and E-Mailed to all agencies. This is specifically important for the NRC and Smith Detection to conduct further historical research.

At this point, no EPA Contractor Resources are planned on being utilized during this removal (Emergency PRP Removal without an Enforcement Instrument).

**2.1.2 Response Actions to Date**

**2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)**

**2.1.4 Progress Metrics**

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

**2.2 Planning Section**

No information available at this time.

**2.3 Logistics Section**

No information available at this time.

**2.4 Finance Section**

No information available at this time.

**2.5 Other Command Staff**

No information available at this time.

**3. Participating Entities**

No information available at this time.

**4. Personnel On Site**

No information available at this time.

**5. Definition of Terms**

No information available at this time.

**6. Additional sources of information**

No information available at this time.

**7. Situational Reference Materials**

No information available at this time.