

15 FINANCIAL ASSURANCE

15.1 Cost Estimate

The cost of implementing the decommissioning actions described in this plan was developed using a variety of cost-estimating data, including curves, generic unit costs, vendor information, conventional cost-estimating guides, and prior similar estimates as modified by site-specific information. Site-cost experience and good engineering judgements were also used to identify those items that will control the estimates. In addition, the following were also assumed:

- The decommissioning effort will begin immediately upon USNRC approval of this Plan, with no delay in decontamination or remedial activities.
- No credit is included in the estimate of decommissioning costs for salvage value or the sale of construction debris or scrap that is deemed to have intrinsic value and may be potentially decontaminated and released for unrestricted use.
- Only the Storage Yard and the areas where slag was used as fill will be subject to decommissioning. Former restricted areas (e.g., G-Warehouse, A-Warehouse, etc.) and other ancillary areas, because they contain no residual radioactivity, have no decommissioning costs other than the cost of completing and documenting a final status survey.
- For construction of the engineered cap, costs include expenses for design and development of final plans and procedures, including the wildlife area as described in Section 8.3.3, above. Administrative expenses and engineering oversight are included as well.
- Long term surveillance and maintenance of the cap, wildlife area and nature trails will include annual exposure rate measurements and visual inspection; well installation, upkeep and sampling; vegetation removal, and general repair. The duration of long-term surveillance is 1,000 years.

Table 17.14 shows that the cost of implementing this plan is \$2,731,161. This amount includes a 25% contingency that was added in order to address unexpected matters that might arise.

15.2 Certification Statement

Because operating funds will be used to implement this decommissioning plan, and because the cost of all activities are secured with an irrevocable stand-by letter of credit, no Certification Statement is necessary.

15.3 Financial Assurance Mechanism

SMC intends to use operating funds and/or parent-company funds to implement this decommissioning plan. Immediately upon termination of License No. SMB-743, SMC will request that the USNRC release its interest in an irrevocable stand-by letter of credit that is currently serving as SMC's financial assurance mechanism pursuant to 10 CFR 40.36.⁸⁴

⁸⁴ Integrated Environmental Management, Inc., Report No. 94005/G-9194 (Rev. 2), "Decommissioning Funding Plan for the Newfield, New Jersey Facility", submitted to Shieldalloy Metallurgical Corporation, September 10, 2001.

16 RESTRICTED USE

This section demonstrates that when License No. SMB-743 is terminated, the requirements of 10 CFR 20.1403 will have been met. Included in this discussion is the eligibility determination (Section 16.1), a discussion of institutional controls in place to support this action (Section 16.2), a discussion of public involvement (Section 16.3), and a summary of dose modeling and ALARA demonstration (Section 16.4).

16.1 Eligibility Demonstration

The ALARA analysis (Section 7.0) of this Plan demonstrates that the potential risks of exposure to the residual radioactivity in the capped Storage Yard are significantly lower than the risks of excavating and shipping the materials offsite to a licensed disposal site. Likewise, the costs of excavation are much higher than any accrued benefits based, primarily, on occupational hazards and the hazards of transporting the contaminated materials to a distant disposal site (see Section 7.3). This analysis demonstrates that SMC is eligible to request release of the site under the provisions of 10 CFR 20.1403.

16.2 Institutional Controls

After remediation activities are complete, a deed notice will be filed with Gloucester County that prohibits or in some way restricts agricultural, residential, and industrial activities on the restricted release areas of the site. At this time, there are no plans for re-development of the restricted release areas after license termination, other than to complete and maintain a wildlife preserve with nature trails as described in Section 8.3.3, above. The final decision(s) on this issue will be made prior to license termination.

To control access to and use of the area while under SMC ownership, a variety of institutional controls, including physical, legal, and administrative mechanisms as described in the following will be implemented:

- SMC will control access to and activities on the capped Storage Yard. Warning signs are and will continue be posted along the fence line. No demolition, excavation, digging, drilling, or other disturbance of the soil, ground, or groundwater, or use of soil, ground, or groundwater for any purpose will be permitted without the written approval of SMC. Public access will only be allowed in selected areas.
- Additional access controls will be applied to the Storage Yard and the capped pile, with access limited to individuals conducting official SMC business.
- SMC may authorize permits for other individuals to use the land, but such permits will require compliance with all the controls listed above and maintenance requirements listed in this section of the plan. SMC will conduct inspections to

ensure compliance with the terms of the permit, as appropriate. If violations of the permit conditions are identified, SMC retains the right to suspend the site activities of the individuals until appropriate corrective action is taken. SMC will conduct a formal review of the effectiveness of any permits and the effectiveness of the land use controls every two (2) years.

- Records of visitors to the site will be prepared and maintained by SMC. SMC will also maintain a record of its review of the effectiveness of these controls for the duration of its ownership of the property.

SMC intends to retain title to the property until such time as all remaining plant operations cease. At that time, SMC intends to turn portions of the property over to the Borough of Newfield, to Gloucester County, or to the State of New Jersey, along with all funds designated for long-term (1000-year) maintenance of the restricted release areas as a wildlife sanctuary. The final decision(s) on the title recipient and areas to be transferred will be made prior to license termination.

16.3 Maintenance

SMC will patrol and inspect the perimeter of the property and the entire area of the former Storage Yard at least once per quarter. These inspections will be documented to show the inspection date, the inspector, and the location of any damage identified during the inspection. SMC will repair any damage, maintain all necessary roads, road shoulders, low water crossings, bridges, nature trails, and culverts and provide access control signs at specified locations. In addition, SMC will maintain the barricading and marking of all roads surrounding or approaching the former Storage Yard.

16.4 Obtaining Public Advice

SMC will solicit local input as it plans and implements its cleanup and management of the residual radioactivity at the site. SMC will establish a Restoration Advisory Board (RAB) as a voluntary advisory group. The RAB members include individuals from state and county regulatory agencies, as well as residents from the county. All of the RAB meetings will be open to the public, and SMC will solicit comments from the general public in addition to the RAB members at the RAB meetings. Meeting minutes are documented and included in the SMC Administrative Record. It is anticipated that the meetings of the RAB will be held each quarter during the planning and implementation phase. After this decommissioning plan is implemented and the license is terminated by the USNRC, the RAB will meet at least once per year.

The meetings will discuss the three aspects of the proposed SMC institutional controls that are identified in 10 CFR 20. 1403(d), specifically:

- Whether the institutional controls provide reasonable assurance that the license termination criterion (TEDE) from residual radioactivity will be met;
- Whether the institutional controls will be enforceable;

- Whether the institutional controls will impose an undue burden on the local community or affected parties; and
- Whether the financial assurances will allow an independent third party to assume and carry out the responsibilities for control and maintenance of the site.

16.5 Dose Modeling and ALARA Demonstration

The summary of dose modeling for the situation where institutional controls are in place is presented in Chapter 5, above. This analysis shows the dose to a maximally-exposed hypothetical individual, with all institutional controls in place is less than 25 mrem per year. In the case where all institutional controls are no longer in place, the Chapter 5 results clearly demonstrate that the 100 millirem per year criterion in 10 CFR 20.1403 will be met for at least 1,000 years after license termination. In both cases, since assumptions used as input to the analyses were selected to maximize the resulting dose, the conditions at the site once this decommissioning plan is implemented will also be ALARA.

17 TABLES

Table 17.1 - Estimated Volume of Stockpiled Materials in the Storage Yard

Material Description	Estimated Volume (m ³)
Stockpiled Slag	28,000
Stockpiled Baghouse Dust	20,000
Slag previously used as fill (excavated)	8,000
Excavated Soil	6,500
Soil from D111 decommissioning	1,900
Soil from D102/D112 decommissioning	200
Soil from AAF Baghouse decommissioning	50
Soil from Flex-Kleen Baghouse decommissioning	480
Baghouse Dust from AAF deposited during decommissioning	30
Baghouse Dust from Flex-Kleen deposited during decommissioning	80
Total:	57,240

Table 17.2 - Census Information**Gloucester County, NJ⁸⁵**

Current Population (2001 estimate)	259,347
White persons	87.1%
Black or African American persons	9.1%
American Indian and Alaska Native persons	0.2%
Asian persons	1.5%
Native Hawaiian and Other Pacific Islander Persons	-
Persons reporting some other race	0.9%
Persons of Hispanic or Latino Origin	2.6%
White persons, not of Hispanic/Latino origin	85.7%
Projected Population Growth	Unspecified

Cumberland County, NJ⁸⁶

Current Population (2001 estimate)	146,289
White persons	65.9%
Black or African American persons	20.2%
American Indian and Alaska Native persons	1.0%
Asian persons	1.0%
Native Hawaiian and Other Pacific Islander Persons	0.1%
Persons reporting some other race	9.1%
Persons of Hispanic or Latino Origin	19.0%
White persons, not of Hispanic/Latino origin	58.4%
Projected Population Growth – 2001-2006**	1.47%

**Estimated based on data from Vineland business website (http://www.vinelandbusiness.com/Demographics_frameset.htm)

⁸⁵ Source: U.S. Census Bureau website (<http://www.census.gov/>)

⁸⁶ Source: U.S. Census Bureau website (<http://www.census.gov/>)

Table 17.3 - Stream Flow Rates

Sampling Station	11/11/83	06/23/88	04/25/89
1 - Upstream of pond	0	0	--
2 - Downstream of pond	--	55	--
3 - East of West Blvd	680	570	155
4 - Car wash (Weymouth Road)	450	360	1075
5 - Behind D'Auito's Express	--	405	--
8 - Behind IW2	--	285	--
9 - Behind SC3D	--	375	--
10 - Upstream of SC1D	625	570	1345
12 - Upstream of Arbor Ave.	1,075	415	380

Table 17.4 - Hydraulic Parameters for the Cohansey Sand

Formation Layer	Transmissivity (gpd/ft)	Specific Yield	Hydraulic Conductivity (ft/day)
Upper Cohansey Sand	130,000	0.03	145*
Lower Cohansey Sand	74,000	0.002	

* - Calculated using the transmissivity from the upper Cohansey Sand and an overall thickness of 120 feet

Table 17.5 - Well Characteristics

Source	Well No.	Screen Depth (ftbg)	Rate (GPM)	Type of Test	Results**
1	P4		31.5	24-hour pumping, 6-hour recovery	T=111,000 gpd/ft (pumping) T=90,400 gpd/ft (recovery) S=0.005
2	Layne	106 to 126	165	pumping	T=58,000 gpd/ft S=0.006
2	Layne	42 to 47	42	pumping	T=82,000 gpd/ft S=0.004

**T = Transmissivity; S = Specific Yield

Table 17.6 - Background Soil Concentrations

Sample ID	Campaign Identifier	Radionuclide Concentration (pCi/g)				
		Th-228	Th-232	Th-230	U-234	U-238
980715-15	IEM	0.9	0.9	0.5	0.5	0.5
980715-16	IEM	0.3	1.1	0.2	0.2	0.2
091898-01	IEM	1.8	1.8	1.7	1.7	1.7
091898-02	IEM	1.4	1.4	1	1	1
091898-03	IEM	0.9	0.9	0.8	0.8	0.8
091898-04	IEM	1.4	1.4	0.6	0.6	0.6
091898-05	IEM	0.6	0.6	0.6	0.6	0.6
091898-06	IEM	0.6	0.6	0.5	0.5	0.5
091898-07	IEM	1.2	1.2	0.5	0.5	0.5
091898-08	IEM	0.6	0.6	0.9	0.9	0.9
S7	USNRC	0.29	0.33	0.9	0.9	0.9
ORAU-1	ORAU	0.3	0.3	1.3	1.3	1.3
ORAU-2	ORAU	0.5	0.5	0.4	0.4	0.4
ORAU-3	ORAU	0.1	0.1	0.3	0.3	0.3
ORAU-4	ORAU	0.1	0.1	0.3	0.3	0.3
ORAU-5	ORAU	0.4	0.4	0.4	0.4	0.4
ORAU-6	ORAU	0.5	0.5	0.4	0.4	0.4
ORAU-7	ORAU	0.6	0.6	0.8	0.8	0.8
ENSR-1	ENSR	1.48	1.48	0.83	0.83	0.83
ENSR-2	ENSR	0.28	0.28	1.38	1.38	1.38
ENSR-3	ENSR	1.91	1.91	1.37	1.37	1.37
ENSR-4	ENSR	1.68	1.68	0.92	0.92	0.92
ENSR-5	ENSR	1.19	1.19	1.04	1.04	1.04
ENSR-6	ENSR	1.35	1.35	0.42	0.42	0.42
Mean		0.85	0.88	0.75	0.75	0.75
Standard Deviation		0.56	0.55	0.40	0.40	0.40

Table 17.7 - Average Radionuclide Concentration

Material Type	Concentration (pCi/g)		
	Thorium series	Uranium series	Actinium series
Slag ⁸⁷	359	359	16
Baghouse dust ⁸⁸	10	10	1
Contaminated soil ⁸⁹	18	18	1

⁸⁷ Berger, C. D., Integrated Environmental Management, Inc., written communication to C. S. Eves, Shieldalloy Metallurgical Corporation, October 6, 1994.

⁸⁸ Shieldalloy Metallurgical Corporation, "Applicant's Environmental Report for the Newfield, New Jersey Facility", October 1, 1992

⁸⁹ Integrated Environmental Management, Inc. Report No. 94005/G-17172, "Final Status Survey of Haul Road", June 22, 1999.

Table 17.8 - Derived Source Term⁹⁰

Isotope	Concentration ⁹¹ (pCi/gram)
Actinium-227	8.00
Protactinium-231	8.00
Lead -210	182.00
Radium-226	182.00
Radium 228	182.00
Thorium-228	182.00
Thorium-230	182.00
Thorium-232	182.00
Uranium-234	182.00
Uranium-235	8.00
Uranium-238	182.00

⁹⁰ IT Corporation, "Assessment of Environmental Radiological Conditions at the Newfield Facility", Report No. IT/NS-92-106, April 2, 1992.

⁹¹ The isotopic concentration was calculated using the average concentration of radioactivity in the slag, baghouse dust and contaminated soil (Table 17.11). The mass for the three components was estimated using the inventory records from SMC (Table 17.14). The derived concentration of radioactivity in the Storage Yard was calculated using a weighted average and assuming that the decay progeny are in secular equilibrium.

Table 17.9 - Partition Coefficients⁹²
(K_d) (cm^3/gram)

Element	Contaminated Zone	Unsaturated Zone	Saturated Zone
Actinium	2400	2400	450
Protactinium	2700	2700	550
Lead	550	550	270
Radium	9100	9100	500
Thorium	5800	5800	3200
Uranium	1600	1600	35

⁹² Shappard and Thibault, Default Soil Solid/Liquid Partition Coefficients, K_dS , for Four Major Soil types: A compendium, Health Physics Journal, Volume 59, Number 4, October 1990.

Table 17.10 - Physical Parameters

Description	Input Parameter
Density of Cover Soil	1.31 grams/cm ³
Density of slag ⁹³	2.14 grams/cm ³
Cover Diffusion Coefficient ⁹⁴	5×10^{-7} meter ² / second

⁹³ Teledyne Isotopes, "Report of Leachability Studies for Shieldalloy Metallurgical Corporation", Teledyne Isotopes, Westwood, New Jersey, 1992.

⁹⁴ Pacific Northwest Laboratory, Radon Attenuation Handbook for Uranium Mill Tailings Cover Design, NUREG/CR 3533, April, 1984

Table 17.11 - Inventory of Materials In the Storage Yard⁹⁵

Description	Volume
Slag	28,000 m ³
Baghouse dust	20,000 m ³
Potentially contaminated soil	9,200 m ³

⁹⁵ Integrated Environmental Management, Inc. Report No. 94005/G-9194 (Rev 2), "Decommissioning Funding Plan for the Newfield, New Jersey Facility", July 26, 2001.

Table 17.12 - DCGL Values

Radionuclide	Medium	DCGL	Units
U-238 plus progeny	Building Surfaces	78	dpm (α)/100 cm ²
Th-232 plus progeny	Building Surfaces	24	dpm (α)/100 cm ²
U-238 plus progeny	Soil volumes	29	pCi/g
Th-232 plus progeny	Soil volumes	44	pCi/g

Table 17.13 - Gross DCGL Values

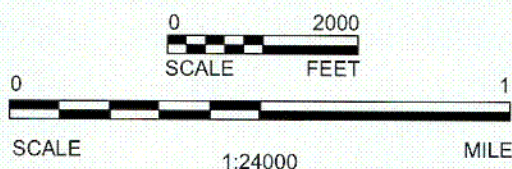
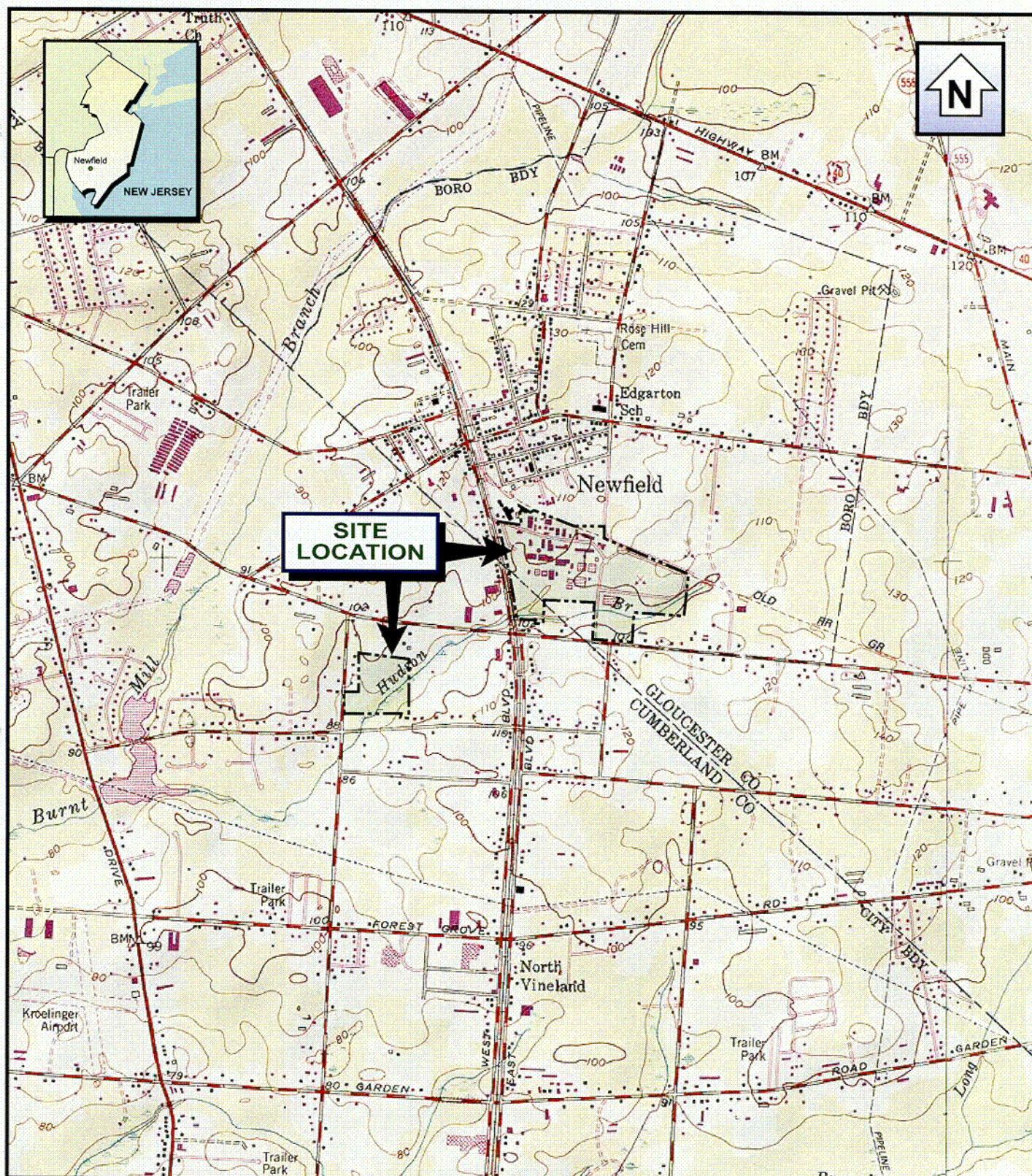
Medium	DCGL	Units
Building Surfaces	37	dpm (α)/100 cm ²
Soil volumes	35	pCi/g

Table 17.14 - Decommissioning Cost Estimate

Task/Component	Total Cost (\$)
Planning and preparation	\$45,571
Decontamination and/or dismantling of facility components	\$165,243
Restoration of contaminated areas on facility grounds	\$9,997
Final Status Survey	\$31,438
Site stabilization and long-term surveillance	\$781,300
Packing material, shipping and waste disposal	\$0
Equipment/supplies	\$999,380
Miscellaneous	\$152,000
Subtotal	\$2,184,929
Contingency (25%)	\$546,232
Total Decommissioning Cost Estimate	\$2,731,161

18 FIGURES

Figure 18.1 - Site Location Map



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7.5' USGS TOPOGRAPHIC MAP

smcorg37149.fh9

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NEWFIELD, NEW JERSEY

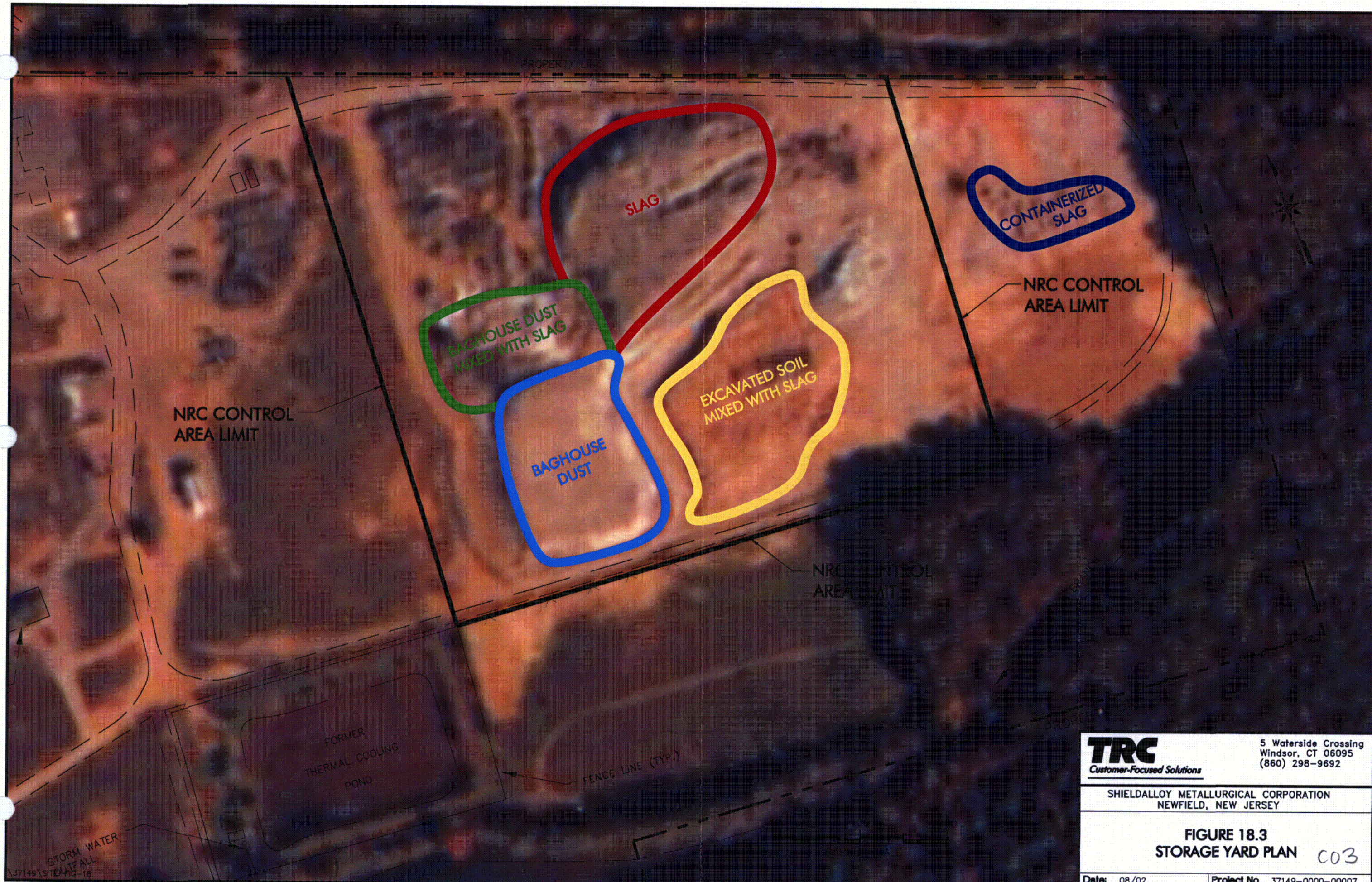
FIGURE 18.1
SITE LOCATION MAP COI

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Project No. 37149-0000-00000

Figure 18.2 - Site Plan

Figure 18.3 - Storage Yard Plan



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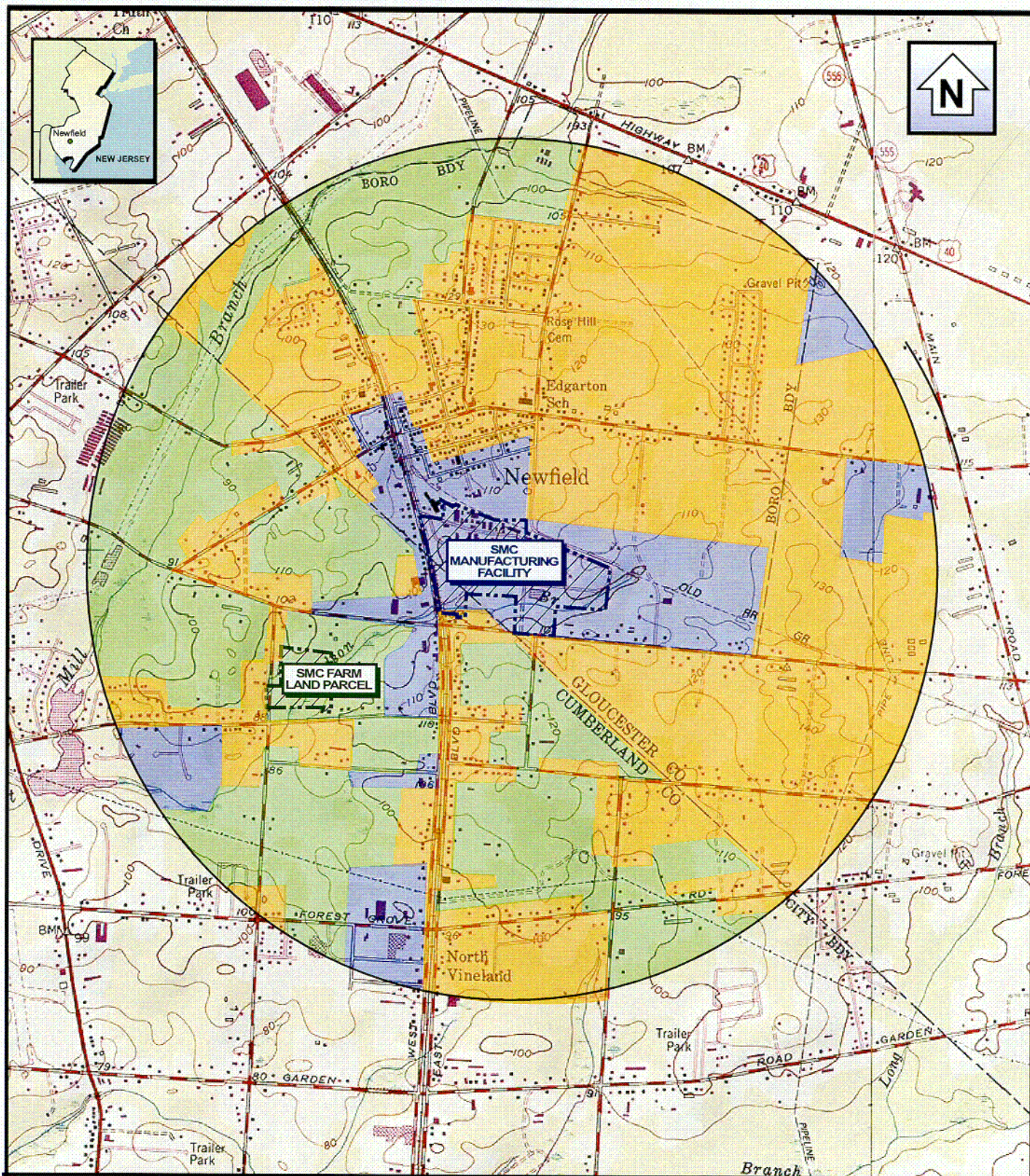
FIGURE 18.3
STORAGE YARD PLAN

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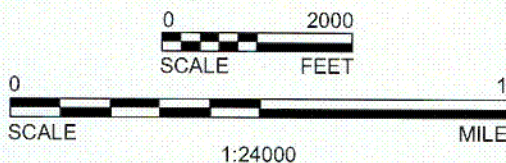
Project No. 37149-0000-00007

Figure 18.4 - Land Use Map



KEY

 Residential	 Business, including commercial & industrial	 Cultivation & woodlands
---	---	--



BASE CREATED WITH TOPO™ © 1996 WILDFLOWERS PRODUCTIONS, www.topo.com 7.5' USGS TOPOGRAPHIC MAP

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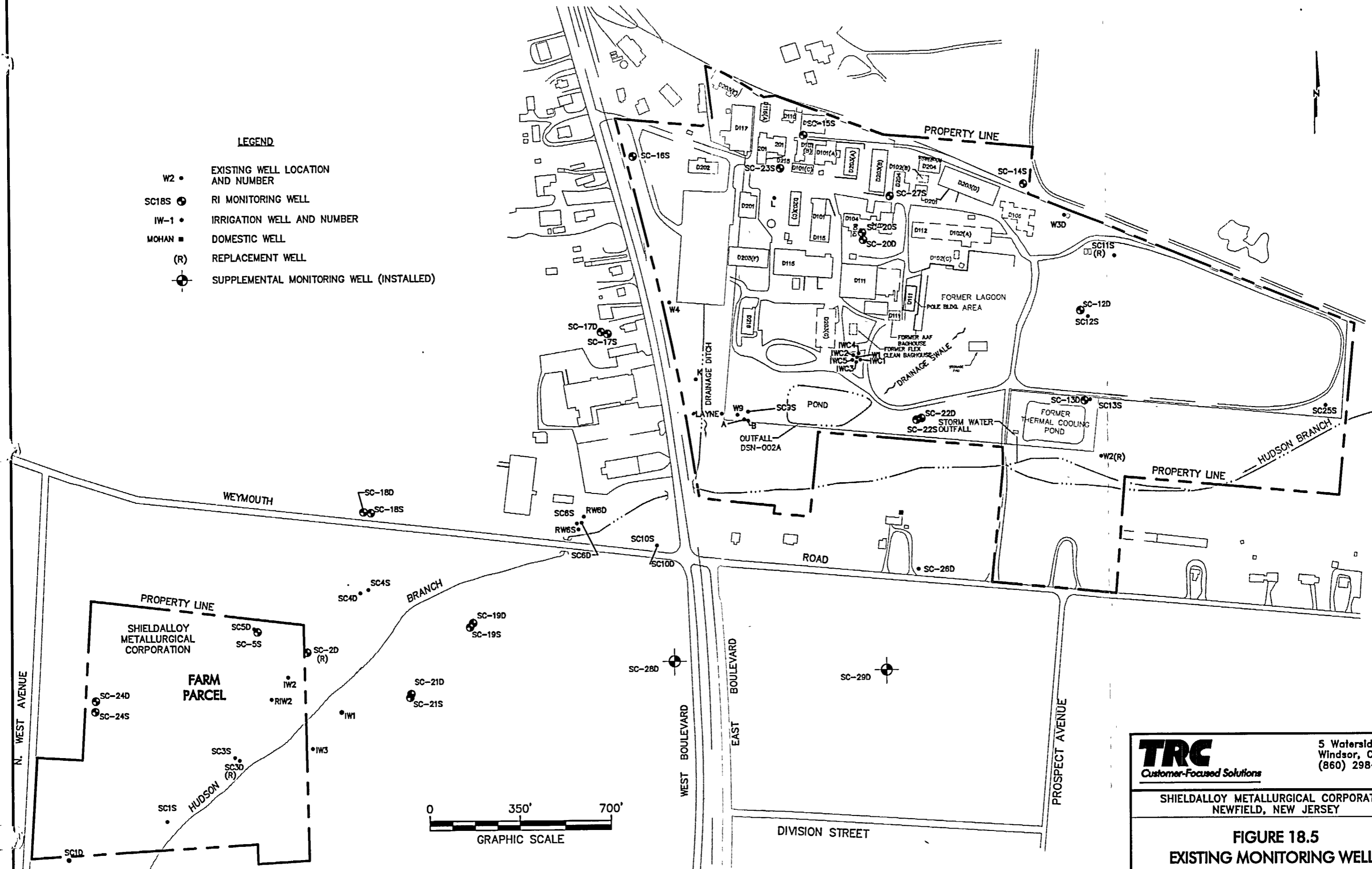
FIGURE 18.4 C04
LAND USE WITHIN 1 MILE OF SMC

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Project No. 37149-0000-00000

Figure 18.5 - Existing Monitoring Wells

- LEGEND**
- W2 • EXISTING WELL LOCATION AND NUMBER
 - SC18S • RI MONITORING WELL
 - IW-1 • IRRIGATION WELL AND NUMBER
 - MOHAN ■ DOMESTIC WELL
 - (R) REPLACEMENT WELL
 - SUPPLEMENTAL MONITORING WELL (INSTALLED)



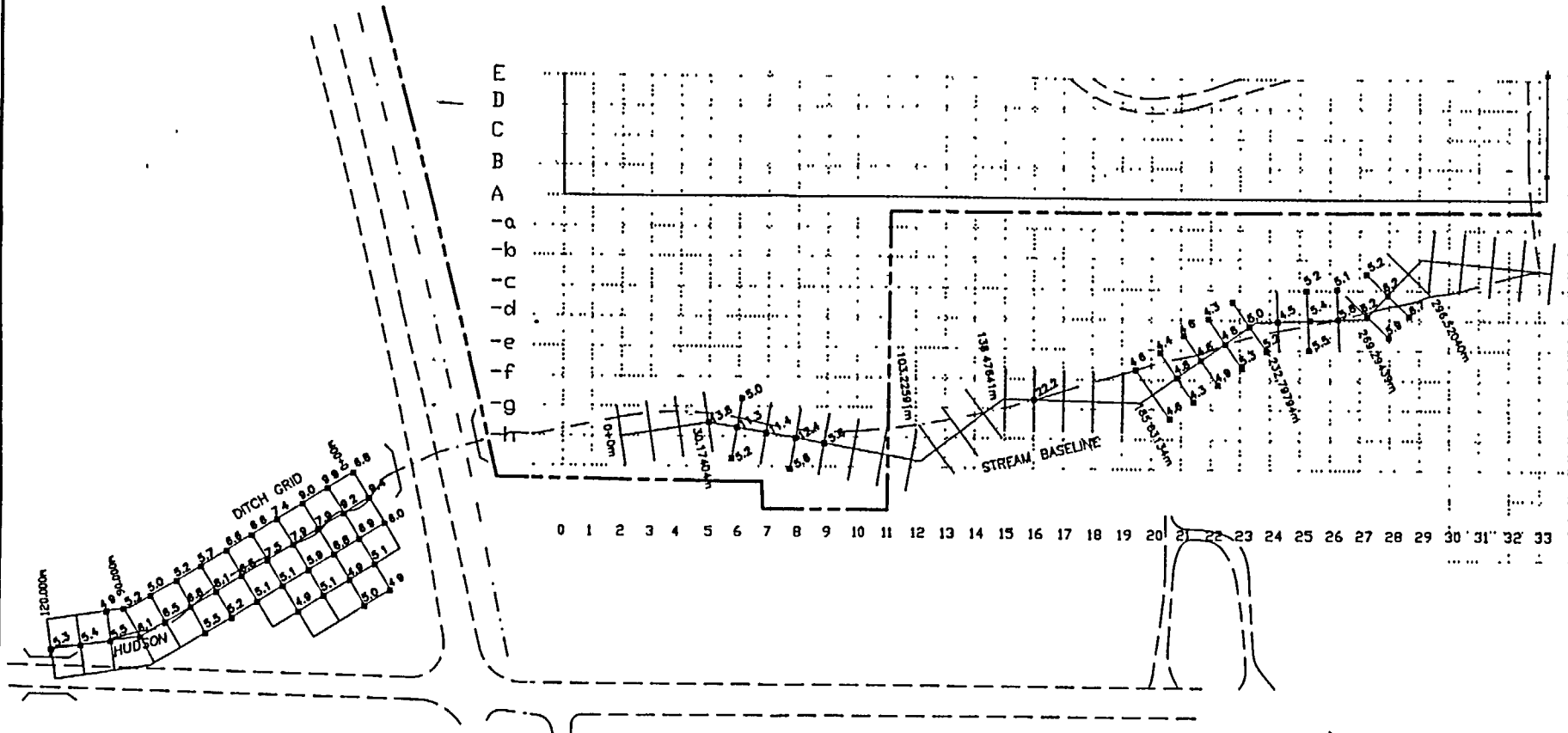
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FIGURE 18.5 EXISTING MONITORING WELLS	
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Figure 18.6 - Restricted and Former Restricted Areas

Figure 18.7 - Hudson's Branch Watershed

STARTING DATE 03/17/92	DATE LAST REV:	DRAFT. CHK. BY: J. HUBBARD	INITIATOR: H. PRICHARD	DWG. NO.: 464408-9-03
DRAWN BY: G. PADRICO	DRAWN BY:	ENGR. CHK. BY: H. PRICHARD	PROJ. MGR.: C. BERGER	PROJ. NO.: 464408

46440803 03/18/92 2:56pm EWB



NOTE: THIS MAP IS BASED ON DATA TRANSMITTED ELECTRONICALLY FROM SMC TO IT CORPORATION IN FEBRUARY, 1992

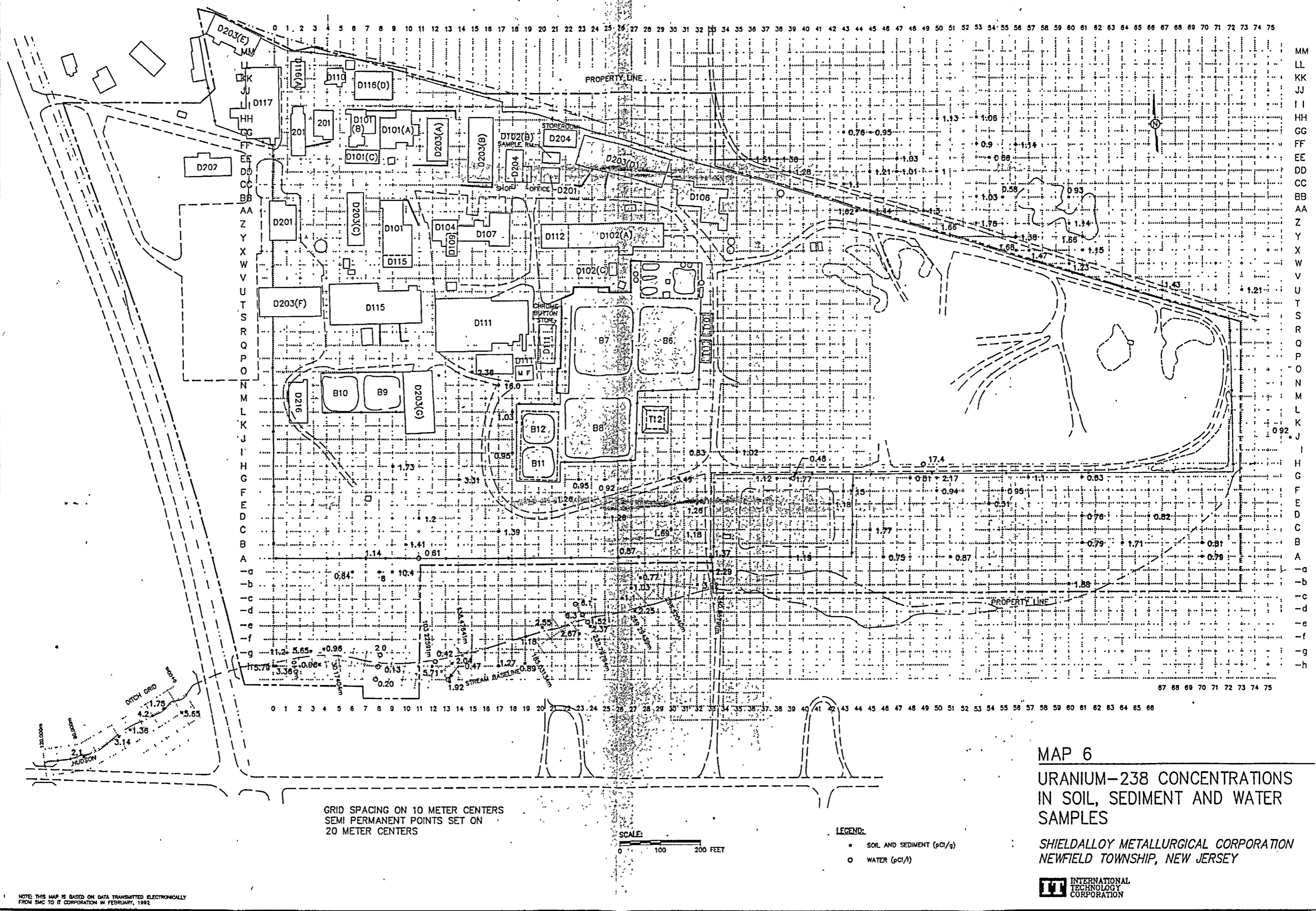
SCALE:
0 120 240 FEET

MAP 4
HUDSON'S BRANCH EXPOSURE
RATES ($\mu\text{R/hr}$)
SHIELDALLOY METALLURGICAL CORPORATION
NEWFIELD TOWNSHIP, NEW JERSEY

IT INTERNATIONAL
TECHNOLOGY
CORPORATION

Figure 18.8 - Sampling Locations and Results

46440904 03/30/92.2:52pm DJH



STARTING DATE: 03/06/92	DATE LAST REV:	INITIATOR: H. PRICHARD	DRAWING NO.: 464409-D-03
DRAWN BY: S. CARDWELL	DRAWN BY:	PROJECT MGR.: C. BERGER	PROJECT NO.: 464409

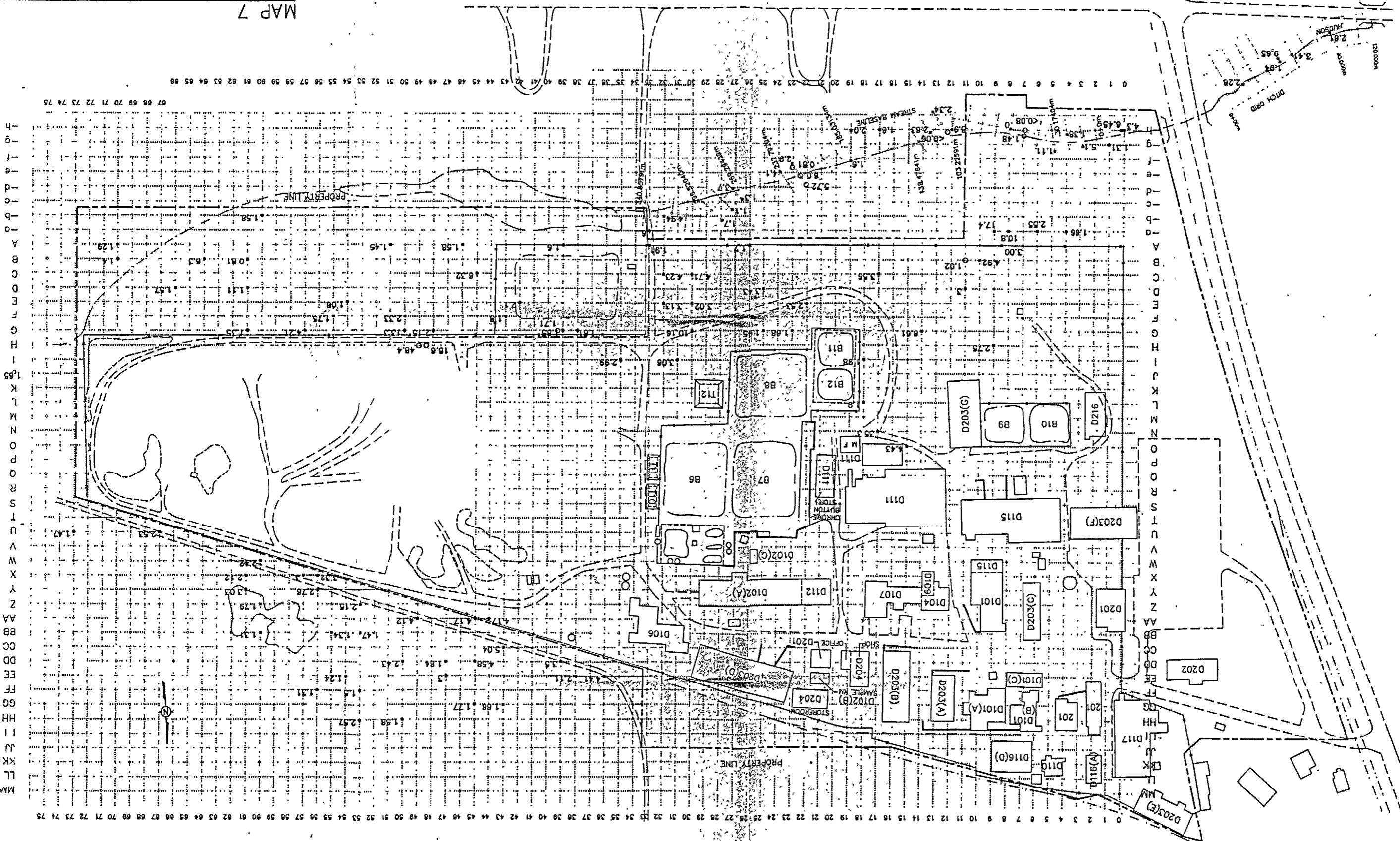
NOTE: THIS MAP IS BASED ON DATA TRANSMITTED ELECTRONICALLY FROM SMC TO IT CORPORATION IN FEBRUARY, 1992.

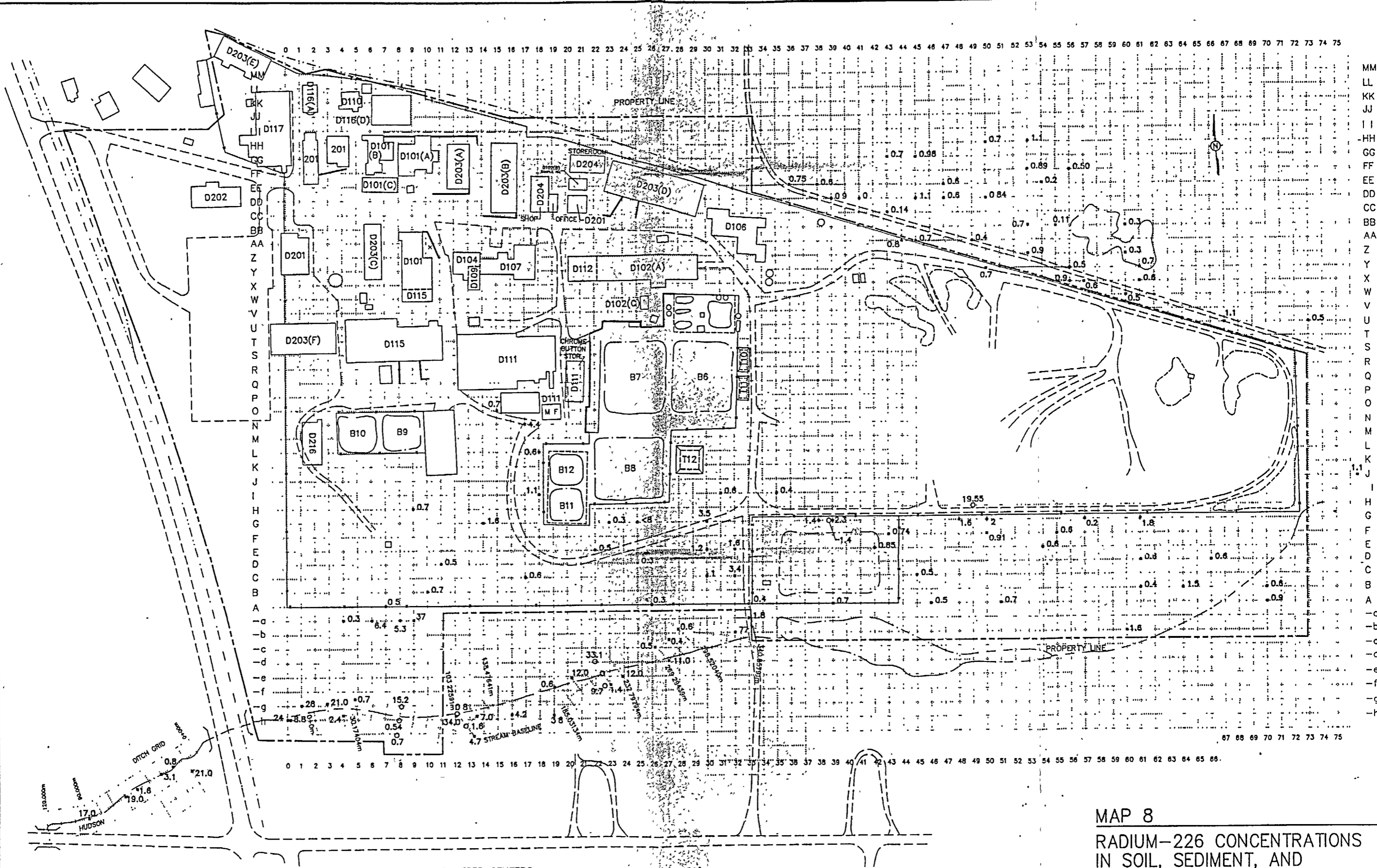
GRID SPACING ON 10 METER CENTERS
SEMI PERMANENT POINTS SET ON
20 METER CENTERS
(HUB, IRON PIN, RR SPIKE OR DRILL HOLE)

SCALE:
0 100 200 FEET

LEGEND:
• SOIL AND SEDIMENT (pc/g)
• WATER (pc/l)

MAP 7
THORIUM-232 CONCENTRATIONS
IN SOIL AND WATER SAMPLES
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GRID SPACING ON 10 METER CENTERS
SEMI PERMANENT POINTS SET ON
20 METER CENTERS
(HUB, IRON PIN, RR SPIKE OR DRILL HOLE)

SCALE: 0 100 200 FEET

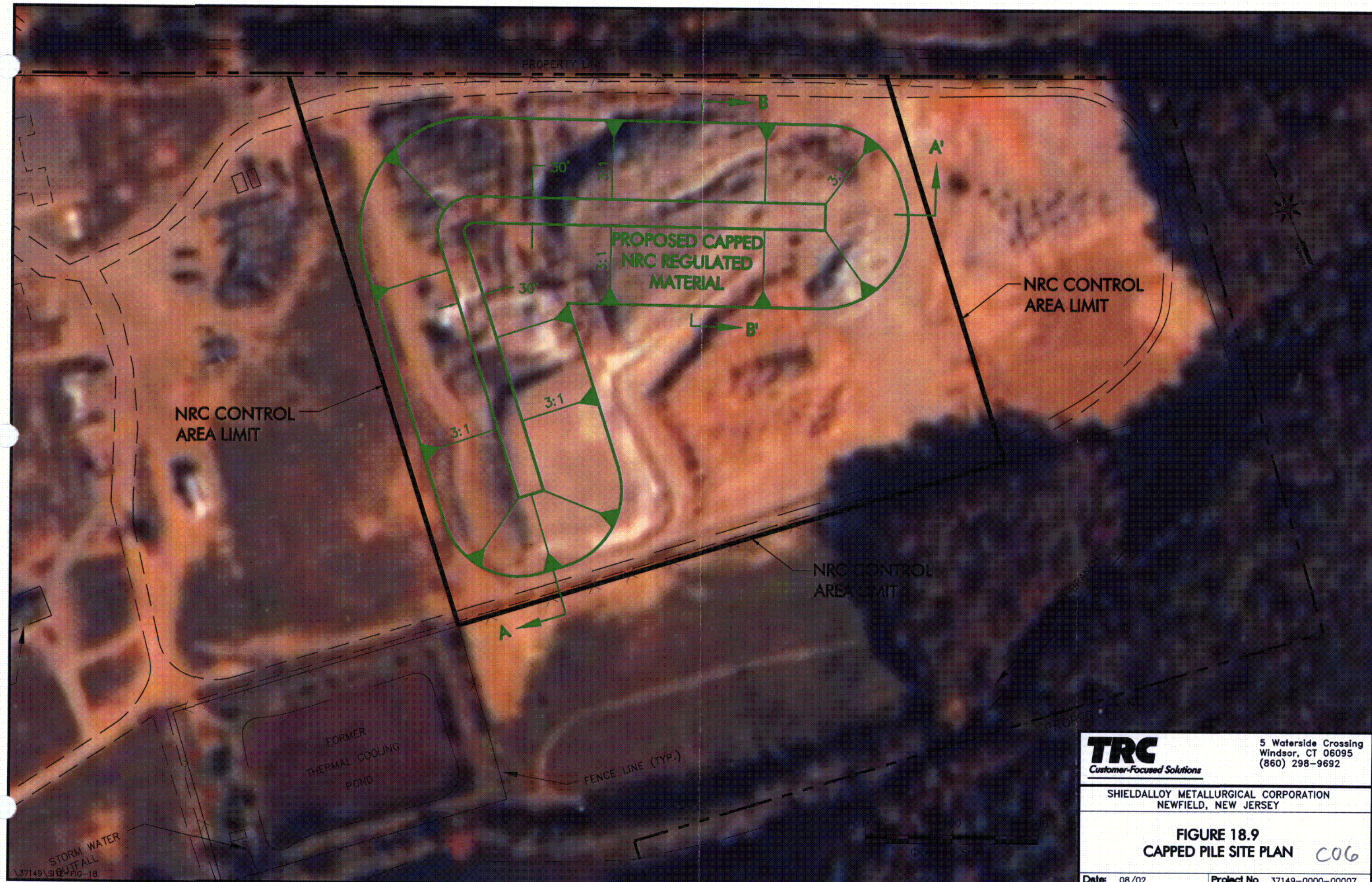
LEGEND:
• SOIL AND SEDIMENT (pCi/g)
○ WATER (pCi/l)

MAP 8
RADIUM-226 CONCENTRATIONS
IN SOIL, SEDIMENT, AND
WATER SAMPLES
SHIELDALLOY METALLURGICAL CORPORATION
NEWFIELD TOWNSHIP, NEW JERSEY



NOTE: THIS MAP IS BASED ON DATA TRANSMITTED ELECTRONICALLY FROM SMC TO IT CORPORATION IN FEBRUARY, 1992

Figure 18.9 - Capped Pile Site Plan



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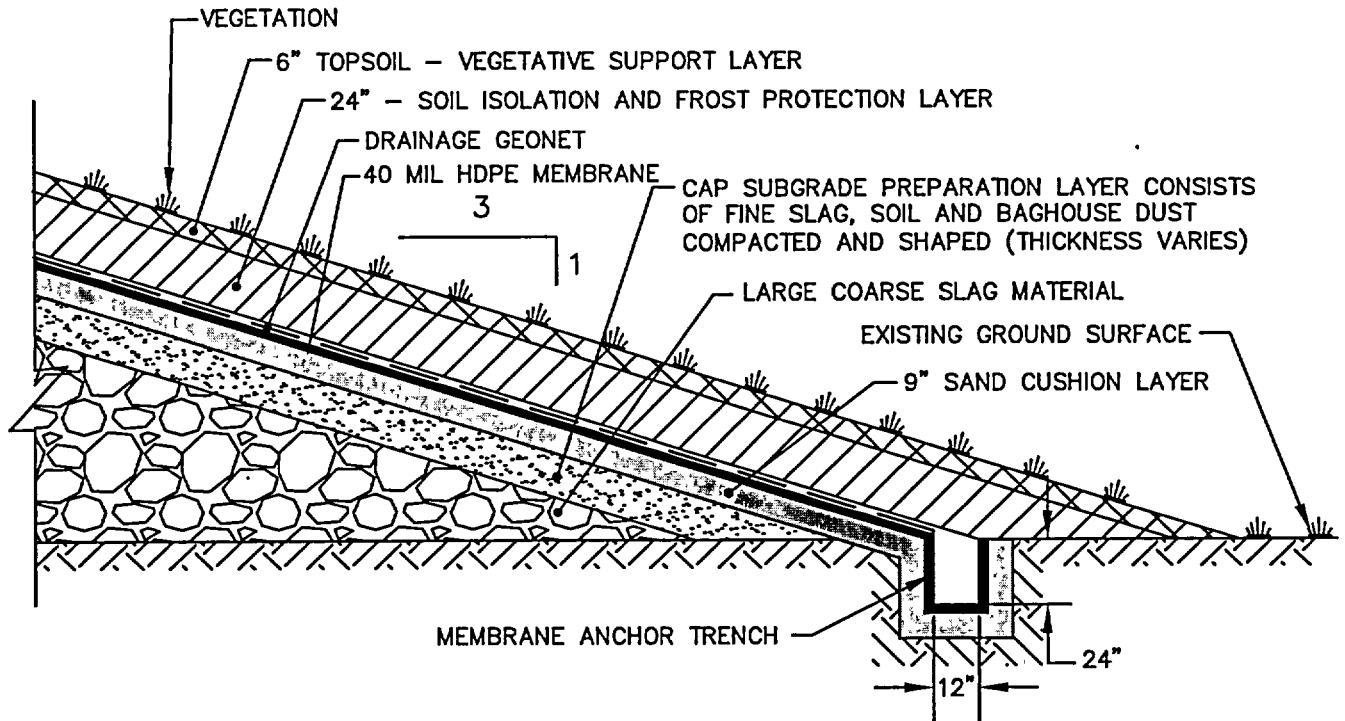
FIGURE 18.9
CAPPED PILE SITE PLAN

COG

Date: 08/02

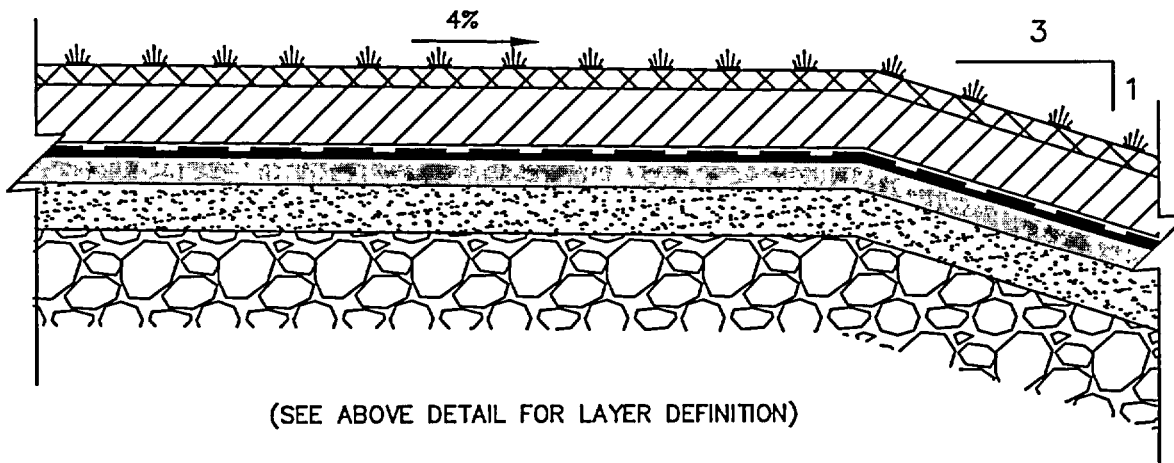
Project No. 37149-0000-00007

Figure 18.10 - Cap Construction Detail



TYPICAL CAP SIDE SLOPE DETAIL

N.T.S.

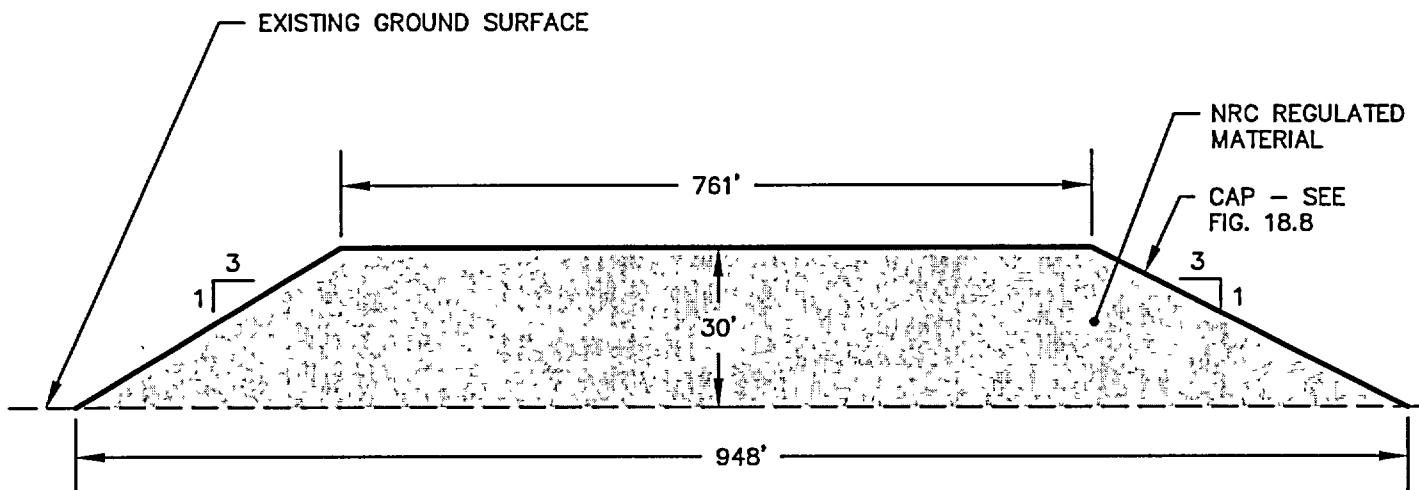


(SEE ABOVE DETAIL FOR LAYER DEFINITION)

TYPICAL CAP TOP DETAIL

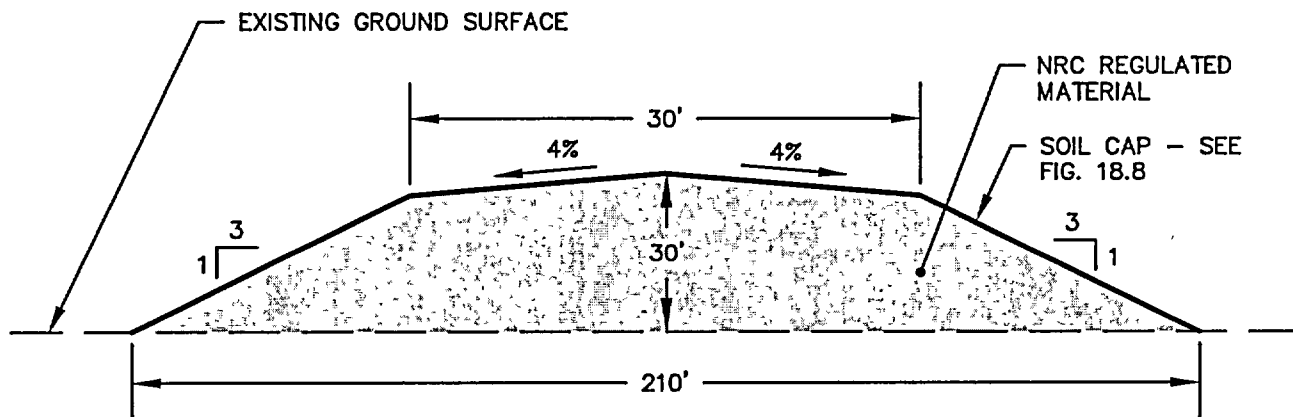
N.T.S.

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FIGURE 18.10 CAP CONSTRUCTION DETAILS	
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SECTION A-A'

N.T.S.



SECTION B-B'

N.T.S.

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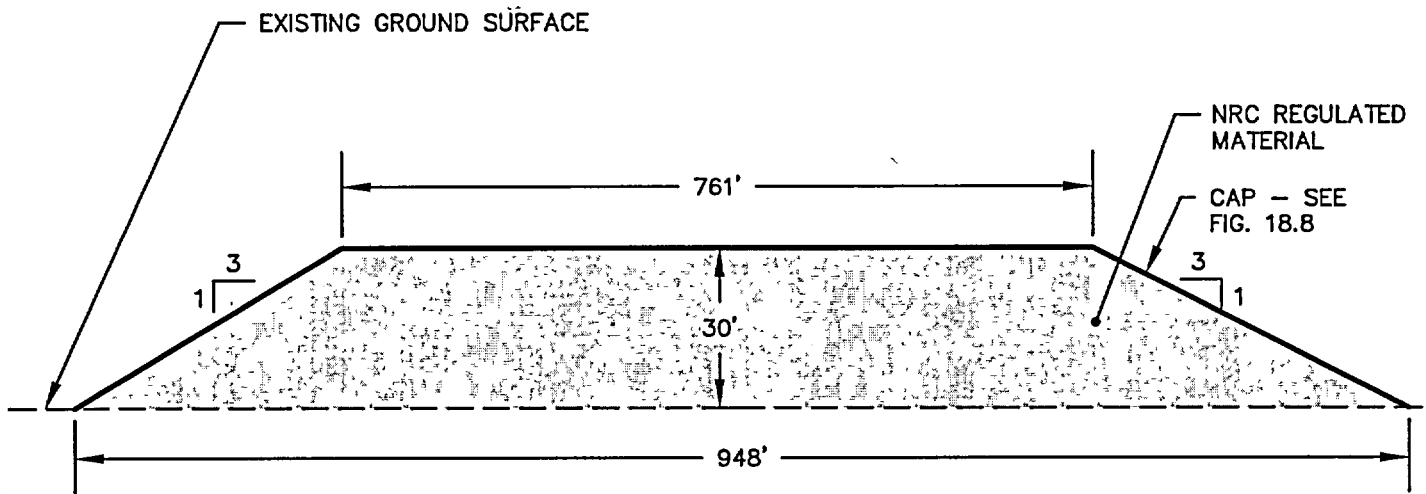
FIGURE 18.11 CAPPED PILE SECTIONS

Date: 08/02

Project No. 37149-0000-00007

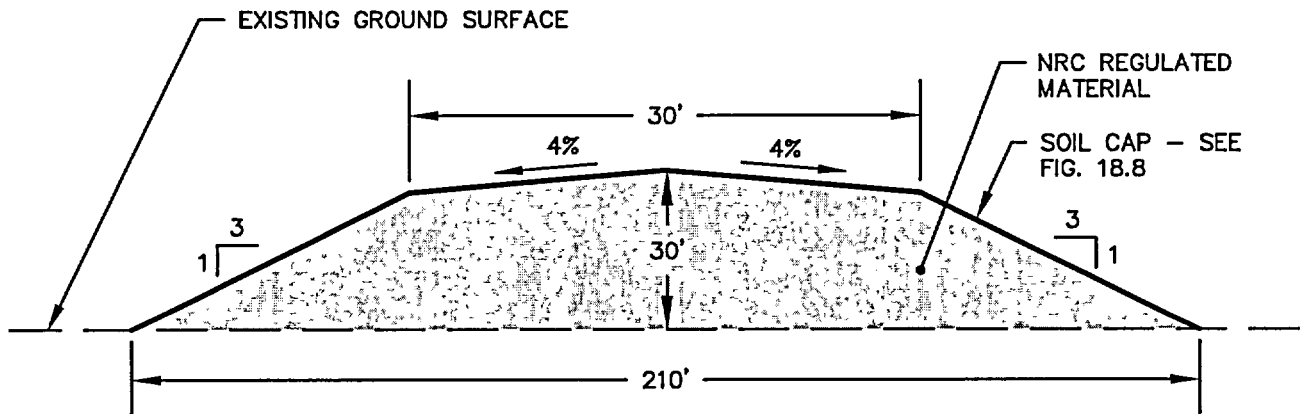
\\37149\\Fig-18.11

Figure 18.11 - Capped Pile Sections



SECTION A-A'

N.T.S.



SECTION B-B'

N.T.S.

TRC
Customer-Focused Solutions

5 Waterside Crossing
Windsor, CT 06095
(860) 298-9692

SHIELDALLOY METALLURGICAL CORPORATION
NEWFIELD, NEW JERSEY

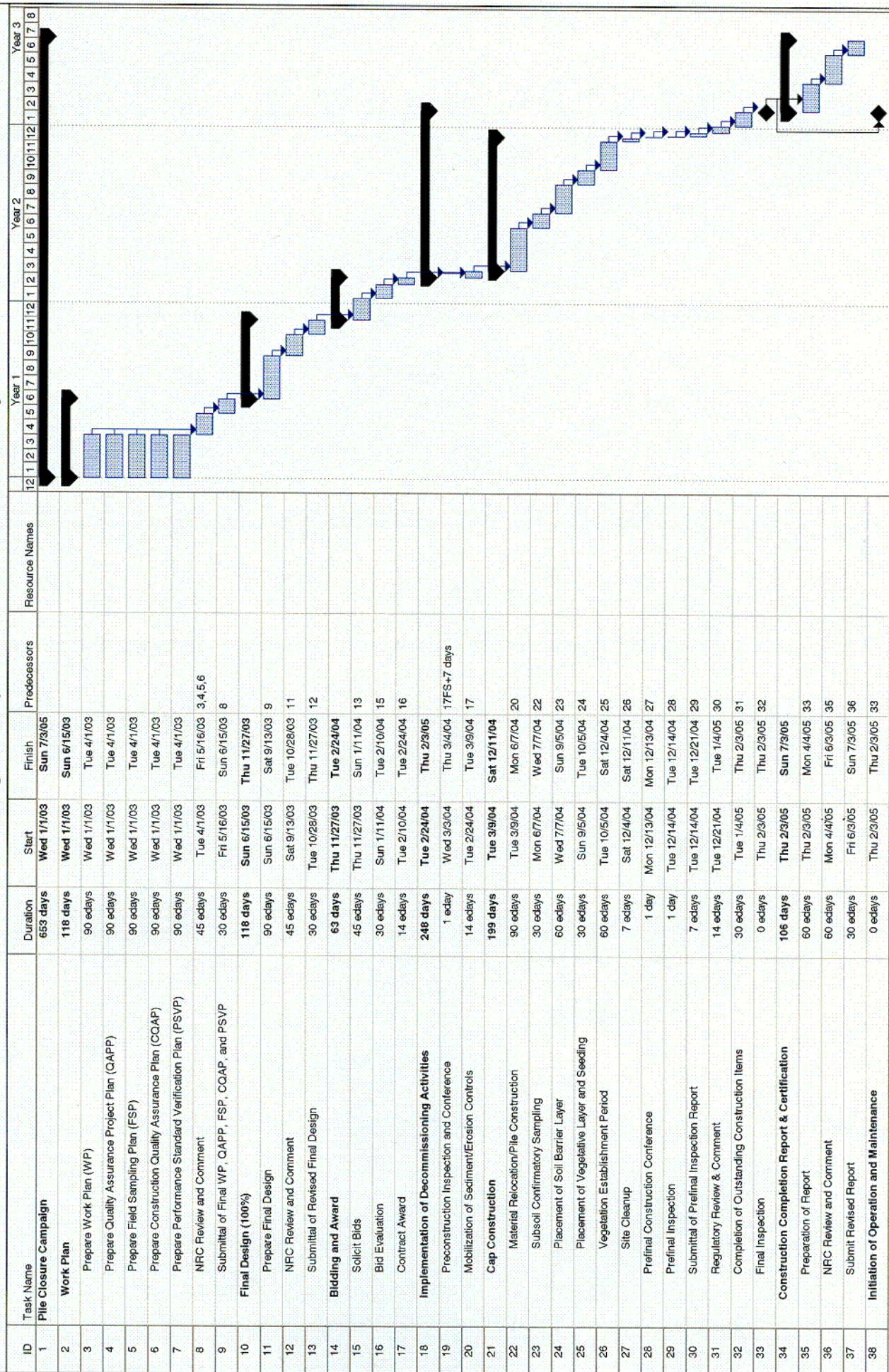
FIGURE 18.11
CAPPED PILE SECTIONS

Date: 08/02

Project No. 37149-0000-00007

Figure 18.12 - Project Schedule

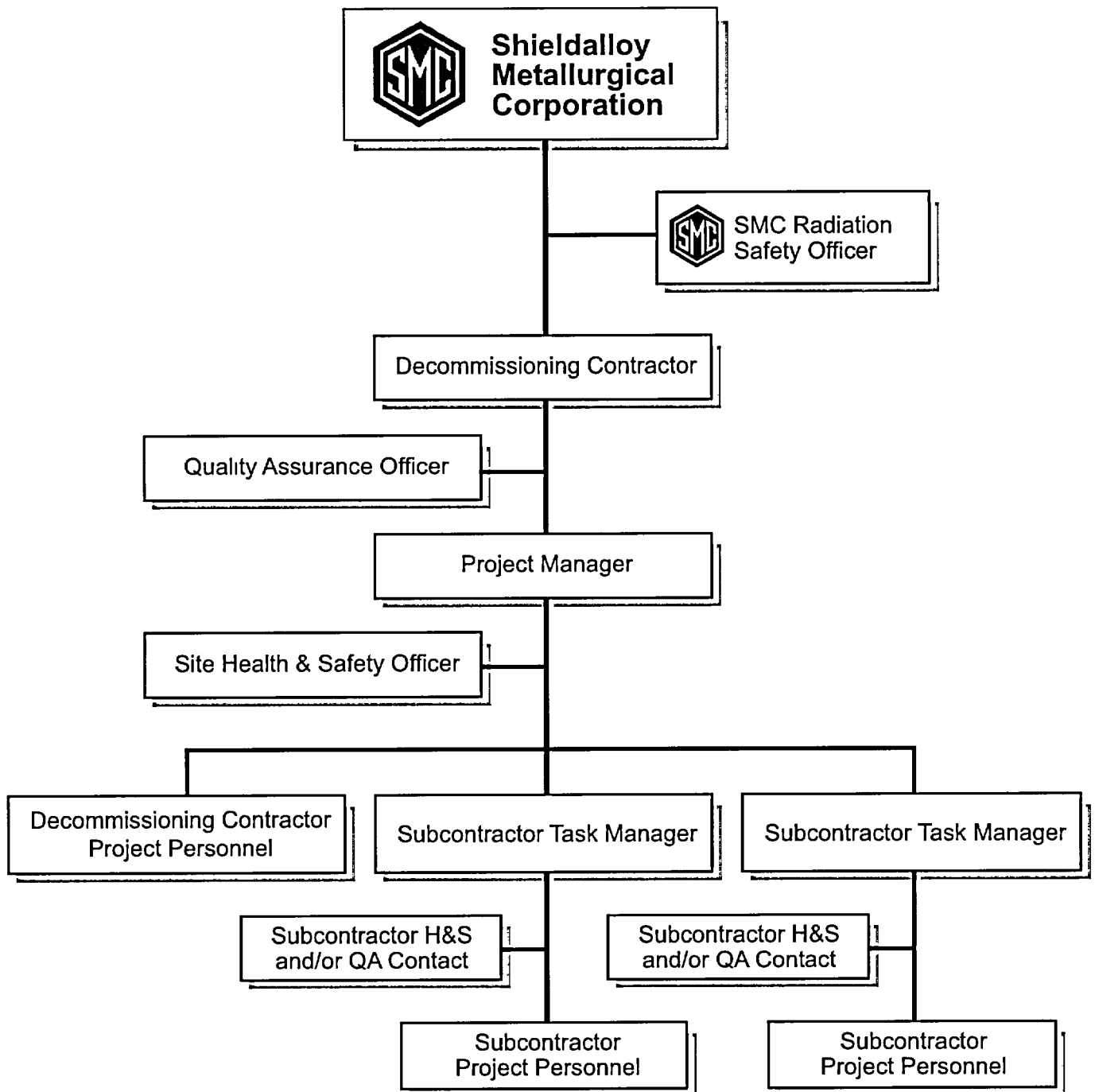
Figure 18.12
Project Schedule
Shieldalloy Metallurgical Corporation, Newfield, New Jersey



Project: Project Schedule
 Date: Tue 8/27/02

C07

Figure 18.13 - Decommissioning Organization Chart



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SHIELDALLOY METALLURGICAL CORPORATION NEWFIELD, NEW JERSEY	
FIGURE 18.13 PROJECT ORGANIZATION	
Date: 08/02	Project No. 37149-0000-00000

Figure 18.14 - Area Classifications

