

October 28, 2005

Mr. Philip M. Mazor
Project Manager
Waste Management, Inc.
700 56th Avenue
Zeeland, MI 49464

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION WITH REGARD TO THE
DECOMMISSIONING PLAN FOR THE SC HOLDINGS, INC. HARTLEY AND
HARTLEY LANDFILL SITE, KAWKAWLIN, MI.

Dear Mr. Mazor:

In a letter dated May 9, 2005, you responded to our request for additional information (RAI) regarding the Decommissioning Plan (DP) for the SC Holdings, Inc., Hartley and Hartley landfill site. We have reviewed your response and determined that additional information regarding dose modeling is required to complete our review of the DP. This letter identifies the issues that arose from our review (enclosed).

Once we receive your response to this request and determine that no additional information is needed, we will expeditiously complete the review of the DP. If you wish to meet to discuss the enclosed questions or if you have any questions regarding this letter, please contact me at (301) 415-6626, or dwn@nrc.gov.

Sincerely,

/KGruss for RA/

David W. Nelson, Program Manager
Decommissioning Directorate
Division of Waste Management
and Environmental Protection
Office of Nuclear Material Safety
and Safeguards

Docket No.: 040-09022
License No.: SUC-1565

Enclosure: Request for Additional Information

cc: SC Holdings, Inc., Distribution List

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OFFICE	DWMEP:PM	DWMEP:LA	DWMEP:SC
NAME	DNelson	CBurkhalter	KGruss
DATE	10/18/05	10/19/05	10/26/05

OFFICIAL RECORD COPY

Request for Additional Information

1. You provided a minimum, maximum, and average dose value for the analysis of the Northwest landfill. It's unclear why the average dose is not used for demonstration compliance as opposed to the minimum dose, as stated in Section 5.5. Please explain your rationale for using the minimum dose.
2. When deriving the derived concentration guideline limits for the slag piles, cumulative effects should be considered, such as, the additional dose received from the Northwest landfill. Please explain the rationale for not considering the additional dose or account for this dose in developing residual concentration levels.
3. There are two different concentration values for Pb-210 provided for the Northwest Landfill (Table 5-4). Please explain the different values.
4. Page 5-5 lists the exposure pathways for the industrial worker as inhalation, direct exposure to gamma radiation, and soil ingestion. Clarification is needed as to why the meat ingestion and aquatic foods pathways were suppressed in the dose analysis for the Northwest Landfill. Note that these pathways were suppressed for the analysis of the slag piles.
5. A dose analysis of the leachate collection system and the storage tank should be provided. In your DP, you indicated that a leachate extraction system will be installed in the Northwest Landfill and that the system would be used for an indeterminate period of time after the site had been released for unrestricted use. In your response to the RAI, you addressed the potential for exposure to radioactive contamination if the leachate system leaked during operation, the potential for exposure to contamination in the leachate piping during operation of the system, and the potential exposure of the workers to contaminated leachate in the storage tank. However, a dose analysis of exposure to the leachate collection system and the storage tank was not provided. Since you have requested that the site be released for unrestricted use, issues such as these regarding the operation of the system need to be addressed.

SCA Service List

cc:

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