

March 9, 2006

Mr. Mike McCann
U.S. Nuclear Regulatory Commission
Region III
2443 Warrenville Road
Suite 210
Lisle, IL 60532-4352

Battelle
The Business of Innovation

505 King Avenue
Columbus, Ohio 43201-2693
(614) 424-6424 Fax (614) 424-5263

Subject: Submittal of the Battelle Memorial Institute Position on Radiological Conditions of Groundwater at the West Jefferson North Site under the NRC SNM-7 License

Dear Mr. McCann:

This letter is being written to document Battelle Memorial Institute's (Battelle's) position on the radiological conditions of groundwater at the West Jefferson North Site. Battelle has met the groundwater criteria for drinking water and for non-drinking water at the Site. These criteria include first as per the Decommissioning Plan - Battelle Memorial Institute Columbus Operations, Revision 5 - Attachment 3 "*Volumetric Release Criteria Technical Basis Document*");

- 10CFR20 Appendix B Table 2 Column 2 for non-drinking water ground water layers

And secondly the West Jefferson Site Environmental Monitoring Plan for Battelle Columbus Laboratories Decommissioning Project, Revision 1 for:

- 40CFR 141(US EPA)for the West Jefferson Site's three drinking water wells.

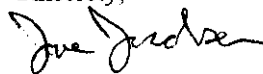
The foundation of this position is Battelle's comprehensive groundwater radiological monitoring program for the West Jefferson North Site, which has been in place since 1990. The results of the ground water monitoring program have been tabulated and presented in the annual Battelle Columbus Laboratories Decommissioning Program (BCLDP) Site Environmental Report for a number of years; this Report has had wide distribution to various DOE, NRC, and EPA offices.

Other monitoring and evaluation activities have been conducted as part of the Site surveillance and maintenance program. Two caisson wells located inside the JN-1B Facility have had documented routine radiological sampling performed for a number of years, with the data that was generated reviewed by the Site health physics staff. In calendar years 2002 and 2003, Battelle conducted a study to verify groundwater flow conditions in preparation for active decommissioning of site structures. During that on-site well drilling campaign, and prior to subsequent abandonment, radiological sampling of the constructed wells was conducted and the radiological data generated reviewed by the Site health physics staff for compliance with 10CFR20 Appendix B Table 2 Column 2 criteria.

Battelle plans on continuing with the radiological monitoring of the existing groundwater monitoring wells on the Site identified in the groundwater monitoring program through the license termination process, which is eminent. Battelle has no plans to expand its ground water monitoring program or study Site groundwater conditions any further prior to submitting the NRC Form 314 request for license termination as an unrestricted release site, as currently planned in April of 2006.

If you have any questions or comments concerning this position, please do not hesitate to call me at 614-424-4098.

Sincerely,



Joe Jacobsen

BCLDP Radiation Safety Officer

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Sincerely,



Joe Jacobsen

BCLDP Radiation Safety Officer

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Information

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FedEx Tracking Number 8546 0209 5836

1 From This portion can be removed for Recipient's records.
Date 3/8/06 FedEx Tracking Number 854602095836
Sender's Name Joe Jacobson Phone 614 424-4098
Company BATTELLE COLUMBUS LABS
Address 1425 STATE ROUTE 142 NE
City WEST JEFFERSON State OH ZIP 43162

2 Your Internal Billing Reference

3 To
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4a Express Package Service

☒ FedEx Priority Overnight
Next business morning.* Friday
shipments will be delivered on Monday
unless SATURDAY Delivery is selected.
☐ FedEx Standard Overnight
Next business afternoon.*
Saturday Delivery NOT available.
☐ FedEx First Overnight
Earliest next business morning
delivery to select locations.*
Saturday Delivery NOT available.
☐ FedEx 2Day
Second business day.* Thursday
shipments will be delivered on Monday
unless SATURDAY Delivery is selected.
☐ FedEx Express Saver
Third business day.*
Saturday Delivery NOT available.
*To meet locations

4b Express Freight Service

☐ FedEx 1Day Freight*
Next business day.* Friday
shipments will be delivered on Monday
unless SATURDAY Delivery is selected.
☐ FedEx 2Day Freight
Second business day.* Thursday
shipments will be delivered on Monday
unless SATURDAY Delivery is selected.
☐ FedEx 3Day Freight
Third business day.*
Saturday Delivery NOT available.
*To meet locations

5 Packaging

☐ FedEx Envelope*
☐ FedEx Pak*
Includes FedEx Small Pak,
FedEx Large Pak, and FedEx Sturdy Pak.
☐ FedEx Box
☐ FedEx Tube
☐ Other
*Declared value limit \$500.

6 Special Handling

☐ SATURDAY Delivery
Not available for
FedEx Standard Overnight,
FedEx First Overnight, FedEx Express
Saver, or FedEx 3Day Freight.
☐ HOLD Weekday
at FedEx Location
Not available for
FedEx First Overnight.
☐ HOLD Saturday
at FedEx Location
Available ONLY for FedEx Priority
Overnight and FedEx 2Day
to select locations.
Does this shipment contain dangerous goods?
One box must be checked.
☐ No ☐ Yes
As per attached
Shipper's Declaration.
☐ Yes
Shipper's Declaration
not required.
☐ Dry Ice
Dry Ice 3, UN 1845
kg
Dangerous goods (including dry ice) cannot be shipped in FedEx packaging.
☐ Cargo Aircraft Only

7 Payment

Bill to:
☒ Sender
FedEx Acct. No. in Section
1 will be billed.
☐ Recipient
☐ Third Party
☐ Credit Card
Obtain Recip.
Acct. No.
☐ Cash/Check

Total Packages

Total Weight

Total Charges

Credit Card Auth.

*Our liability is limited to \$100 unless you declare a higher value. See the current FedEx Service Guide for details.

8 NEW Residential Delivery Signature Options

☐ No Signature
Required
Package may be left with-
out obtaining a signature
for delivery.
☐ Direct Signature
Anyone at recipient's
address may sign for delivery.
Fee applies.
☐ Indirect Signature
If no one is available at
recipient's address, anyone
at a neighboring address may
sign for delivery. Fee applies.

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