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(Ex 5)

SENSITIVE MEMORANDUM

To: File

Fr: Yolande Norman (NRC- Project Manager) *YN*

Date: June 11, 2009

Re: Inter-Agency Meeting on June 9, 2009 in Pittsburgh, Pennsylvania
Shallow Land Disposal Area -FUSRAP Site / Babcock & Wilcox Technology/Services
(BWXT/BWX)
Parks Township, Armstrong County, Pennsylvania
License No. SNM-2001; Docket No. 070-03085

Purpose: To provide an overview of the Final Work Plan - June 2009, submitted by the US Army Corps of Engineers while NRC review the request to initiate SLDA'S License suspension.

Outcome: To achieve unrestricted release in accordance with 10 CFR 20.1402 and License Termination for FUSRAP material for the SLDA property.

Process: Periodic Technical Meetings; Inter-Agency Government Meetings; Site Visits/Site Inspections

Attendance: Approximately 25 representatives from several government agencies [Pennsylvania Department of Environmental Protection (PADEP), Nuclear Regulatory Commission (NRC) and, US Army Corps of Engineers (USACE) - see attached sign-in sheet]

Presenters: US Army Corps of Engineers (USACE) and their contractor (Cabrera Services)

Background

- In a letter dated May 14, 2009, the US Army Corps of Engineers notified the NRC to suspend the SLDA License.
- On June 4, 2009, the NRC received the *Final Work Plan - May 2009 commissioned by the USACE*.

Overview of Presentation

USACE provided a crosswalk of their *Final Work Plan - May 2009* to assess, excavate and dispose of FUSRAP material from ten (10) burrow pits. The selected remedial strategy was outlined in the *Record of Decision -September 2007 (ML 07-2620222)*. Projected quantity of FUSRAP material to be removed is estimated between 70,000 and 80,000 tons.

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Information in this record was deleted in
accordance with the Freedom of Information Act:
Exemptions 5, 6, 7, 8, 9
FOIA 2011-0289

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- PADEP will be coordinating with US ACE to conduct some supplemental periphery air monitoring analyses.

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- In late July-August 2009, USACE anticipates hosting a public meeting on the *Final Work Plan*.
- Actual remediation activities (i.e. trenching of burrow pits) will begin in spring 2010.

SHALLOW LAND DISPOSAL AREA MEETING SIGN IN SHEET

June 9, 2009

NAME	ORGANIZATION	PHONE NO.	EMAIL ADDRESS
John Eberlin	Cabrera Services	(b)(6)	jeberlin@cabreraseservices.com
Hank Siegrist	Cabrera Services	(b)(6)	hsiegrist@cabreraseservices.com
Joe Weismann	Cabrera Services	(b)(6)	jweismann@cabreraseservices.com
Ron Church	USACE - LRD	(b)(6)	(b)(6)
Suzanne Beauchamp	USACE - HQ	(b)(6)	(b)(6)
Sharron DeCosta-Chisley	USACE - HQ	(b)(6)	(b)(6)
Michael G. Fairbank	PA DEP - waste	412 442 4120	mforbeck@state.pa.us
Bob Maier	PA DEP - BRP	717-783-8979	rmaier@state.pa.us
Dave Eberle	PA DEP - ECP	412-442-4156	deberle@state.pa.us
Barbara Buntin	PA DEP - ECP	412 442 4132	bbuntin@state.pa.us
LYDIA CHANG	US NRC	301-415-8141	lydia.chang@nrc.gov
Yolande Norman	US NRC	301-415-7141	yolande.norman@nrc.gov
Maurice Lemorelli	US NRC	301-415-1338	maurice.lemorelli@nrc.gov
ANDREW WRIGHT	SEVENSON	716 284 0431	awright@sevenson.com
Karen Milcic	PA DEP - Water	412-442-4033	kmilcic@state.pa.us
Bill Lorenz	Cabrera Services	(b)(6)	blorenz@cabreraservices.com

SHALLOW LAND DISPOSAL AREA MEETING SIGN IN SHEET

June 9, 2009

NAME

ORGANIZATION

PHONE NO.

EMAIL ADDRESS

STAWN ANDREWS

USACE

David Flottinger

USACE

Jenna Hummel

USACE

Dana Adipietro

USACE-OC

HARMA SPEN

USMC

Colm Ozaime

USACE-OC

Jim Boyle

USACE

Michael Lambert

Cabrera

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Parks Township Shallow Land Disposal Area (SLDA) FUSRAP Site

Decommissioning Plan (DP) Requirements
Comparison

NUREG-1757, Volume 1

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SLDA History

- Wastes from Apollo and Parks Township facilities disposed at the SLDA site by Nuclear Materials and Equipment Corporation (NUMEC) between 1961 and 1970.
- Disposals terminated in 1970.
- Current owner is BWX Technologies, Inc. (BWXT). Maintained under United States NRC license SNM-2001.
- Atlantic Richfield Co. (ARCO) retains environmental liability.



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SLDA History (cont.)

- Remedial action (RA) planned by the USACE under authorization of the Formerly Utilized Sites Remedial Action Program (FUSRAP).
- RA performed by USACE under Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) protocols.
- The Record of Decision (ROD) for SLDA, signed September 7, 2007, presents the final Selected Remedy - *Excavation, Treatment, and Offsite Disposal*.



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SLDA Remediation Objective

- The selected remedy will involve excavation of contaminated waste and soil, off-site transportation, and disposal at an appropriate licensed/permitted disposal facility.
- The objective of the selected remedy is to meet the criteria for unrestricted release as defined in 10 CFR 20.1402.



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Radionuclides of Concern

- Americium-241 (Am-241)
- Plutonium-239 (Pu-239)
- Plutonium-241 (Pu-241)
- Radium-228 (Ra-228)
- Thorium-232 (Th-232)
- Uranium-234, -235, and -238 (U-234, U-235, U-238)


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DP Comparison

- NRC DP requirements for materials licensees are provided in NUREG-1757, Volume 1.
- Although USACE has not prepared a DP for SLDA, the requirements are addressed in site-specific CERCLA documents and work plans prepared for USACE.

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Decommissioning Group

- Current site conditions do not satisfy the criteria in 10 CFR 20.1402, however, the objective of the selected remedy is to meet these criteria.
- Site-specific DCGLs will be used in lieu of NUREG-1757, Vol. 1, Appendix B screening values. DCGLs were developed with review and concurrence of NRC and PADEP.
- As indicated in the ROD, groundwater has not been impacted as a result of RCOC's present in soil and buried waste at the SLDA.
- Based on the above and the roadmap in NUREG-1757, Vol. 1, Figure 7.1, the SLDA is Decommissioning Group 4.

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DP Elements

- NUREG-1757, Vol. 1, Appendix D specifies 15 elements of a DP for a Group 4 licensee pursuing unrestricted release. These include:
 1. Executive Summary
 2. Facility Operating History
 3. Facility Description
 4. Radiological Status of Facility
 5. Dose Modeling
 6. Environmental Information
 7. ALARA Analysis

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DP Elements (cont.)

8. Planned Decommissioning Activities
9. Project Management and Organization
10. Health and Safety Program During Decommissioning: Radiation Safety Controls and Monitoring for Workers
11. Environmental Monitoring and Control Program
12. Radioactive Waste Management Program
13. Quality Assurance Program
14. Facility Radiation Surveys
15. Financial Assurance

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DP Elements (cont.)

- NUREG-1757, Vol. 1, Appendix D also provides a list of information expected within each of the 15 elements.



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DP Element 1

- Element 1, *Executive Summary*, is addressed in the SLDA ROD and the Remedial Investigation (RI) report, dated October 2005.



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DP Element 2

- Element 2, *Facility Operating History*, is addressed in several USACE documents, including Chapter 2 of the SLDA RI report.



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DP Element 3

- Element 3, *Facility Description*, is also addressed in several USACE documents, including the Executive Summary section and Chapters 1, 2 and 3 of the SLDA RI report.



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DP Element 4

- Element 4, *Radiological Status of Facility*, is addressed in Chapter 4 of the SLDA RI report.


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DP Element 5

- Element 5, *Dose Modeling*, is addressed in Chapters 5 and 6 and Appendix R of the SLDA RI report. This is also addressed in Appendices A and B of the Draft SLDA Final Status Survey Plan.

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DP Element 6


- Element 6, *Environmental Information*, is addressed in Chapters 2, 3, 4, 5, 6 and 7 of the SLDA RI report with supplemental information in several Appendices. This information is also consistent with the requirements in NUREG-1748, *Environmental Review Guidance for Licensing Actions Associated with NMSS Programs*.

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DP Element 7


- Element 7, *ALARA Analysis*, is addressed as follows:
 - Qualitatively, USACE should achieve a decommissioning goal not exceeding the dose limit during remediation because, from previous FUSRAP experience, the nature of soil removal typically leaves residuals at a fraction of DCGL SOR. Note the remediation has been designed for the most conservative release scenario, subsistence farmer.
 - ALARA will be supported by cost-benefit analysis computation for incremental remediation at the time of decommissioning using the methodology of NUREG-1757, Vol. 2 RI Chapter 8 and Appendix N, at a cost-benefit threshold of \$2000/person-rem averted.

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DP Element 8

- Element 8, *Planned Decommissioning Activities*, is addressed in SLDA ROD with details in the SLDA Site Operations Plan (SOP).

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DP Element 9

- Element 9, *Project Management and Organization*, is addressed in the SLDA SOP.

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DP Element 10

- Element 10, *Health and Safety Program During Decommissioning: Radiation Safety Controls and Monitoring for Workers*, is addressed in the SLDA Radiation Protection Plan (RPP) and Accident Prevention Plan (APP).

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DP Element 11

- Element 11, *Environmental Monitoring and Control Program*, is addressed in the SLDA RPP and Water Management Plan (WMP).



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DP Element 12

- Element 12, *Radioactive Waste Management Program*, is addressed in the SLDA Waste Management, Transportation and Disposal Plan.



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DP Element 13

- Element 13, *Quality Assurance Program*, is addressed in the SLDA Quality Assurance Program Plan (QAPP).


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DP Element 14

- Element 14, *Facility Radiation Surveys*, is addressed in the SLDA Field Sampling Plan (FSP) for pre-remediation and remediation control surveys and sampling, with final status surveys addressed in the Draft SLDA Final Status Survey Plan.

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DP Element 15

- Element 15, *Financial Assurance*, is addressed through funding allocated to the Formerly Utilized Sites Remedial Action Program (FUSRAP). SLDA remediation cost estimates for each alternative evaluated, including the selected remedy, are provided in the SLDA Feasibility Study (FS) and ROD.


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Parks Township Shallow Land Disposal Area (SLDA) FUSRAP Site

Special Nuclear Material (SNM) Control and
Accountability

US NRC – Rockville, MD

February 18, 2009

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SLDA History

- Wastes from Apollo and Parks Township facilities disposed at the SLDA site by Nuclear Materials and Equipment Corporation (NUMEC) between 1961 and 1970.
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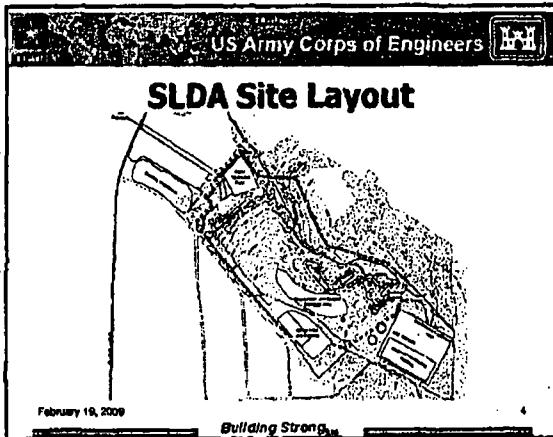
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SLDA History (cont.)

- Remedial action (RA) planned by the USACE under authorization of the Formerly Utilized Sites Remedial Action Program (FUSRAP).
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- The Record of Decision (ROD) for SLDA, signed September 7, 2007, presents the final Selected Remedy site - Excavation, Treatment, and Offsite Disposal.

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ROD Selected Remedy

- The selected remedy, *Excavation, Treatment and Off-site Disposal*, will involve excavation of contaminated waste and soil, off-site transportation, and disposal at an appropriate licensed/permitted disposal facility.
- The objective of the selected remedy is to achieve unrestricted release of the SLDA property as defined in 10 CFR 20.1402.

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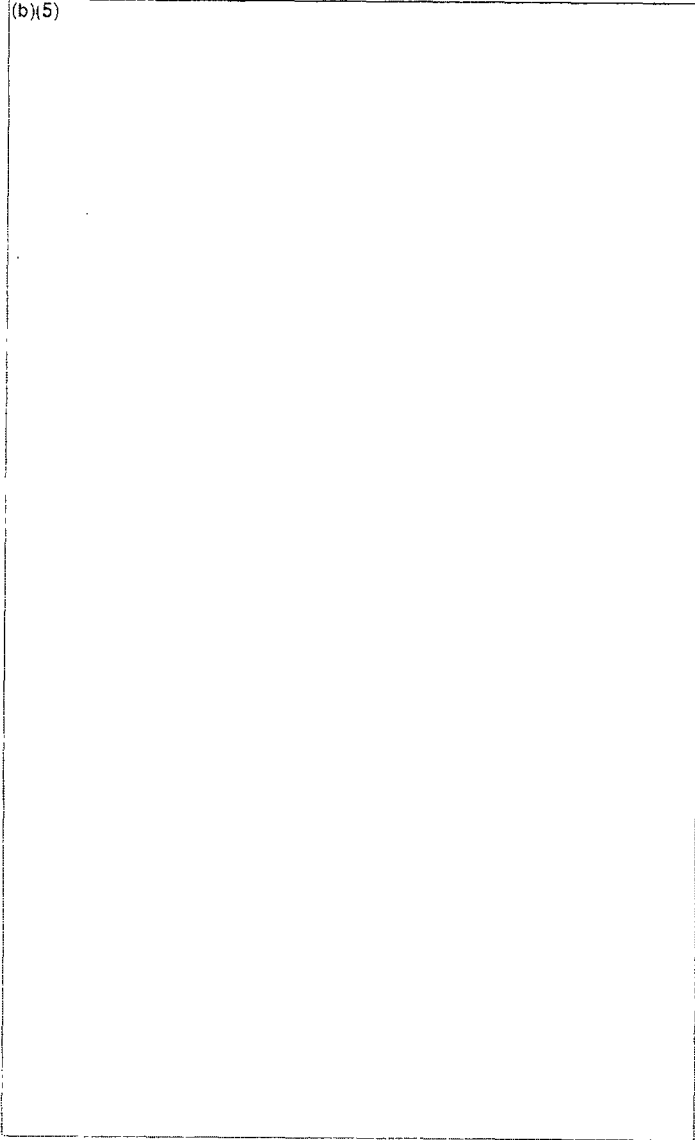
Radionuclides of Concern



- Americium-241 (Am-241)
- Plutonium-239 (Pu-239)
- Plutonium-241 (Pu-241)
- Radium-228 (Ra-228)
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- Uranium-234, -235, and -238 (U-234, U-235, U-238)

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