



Edlow International Company  
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WUI 64387

May 9, 1985

Mr. Bruce Mallet  
Chief of Materials Licensing Section  
U.S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Reference: Edlow International Company's January 23, 1985 Application  
for Renewal of NRC License # SMC-1377

Dear Mr. Mallet,

This letter is being written to inform you that Edlow International Company (Edlow) has recently completed an evaluation of various business factors and has decided to phase out the operation of its East St. Louis natural uranium storage facility by August 31, 1985. As a consequence, Edlow hereby requests the NRC to cease all actions related to the renewal of Edlow's License SMC-1377, and to grant Edlow the right to operate its facility until August 31, 1985, in order to accomodate an orderly site closure. In this regard, the only source materials which remain in storage at the site are approximately 1 million lbs  $U_3O_8$  as drummed yellowcake contained in 49 standard 20' aluminum shipping containers.

In view of the above, I have responded below only to the parts of Mr. Axelson's April 17, 1985 "deficiency letter" to Edlow which are relevant under our current phase-out plan. My responses are numbered in accordance with the numbers of items contained in Mr. Axelson's letter:

- 1.a.1 No natural  $UF_6$  is currently being stored at our East St. Louis facility and none is anticipated to be stored there during the phase-out period.
- 1.a.2. All natural  $U_3O_8$  storage containers are stored outside in Compounds 1 and 2.
- 1.b. Not applicable
- 1.c. Not applicable
- 2.a. Not applicable
- 2.b. The Illinois State Fire Marshall's Office has stated that all fire departments in the State should be independently prepared to respond effectively to a fire involving yellowcake according to the procedures given in document DOT P5800.3 entitled "Hazardous Materials, 1984 Emergency Response Guidebook". This manual is in the hands of all state fire departments.

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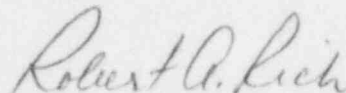
- 2.c. In the event of an emergency at the facility, our security service or our warehouse manager would immediately telephone our Washington office which would immediately telephone NRC Region III.
- 2.d. Even though the  $UF_6$  cylinder repair kit is no longer necessary, all the component parts are in one place on easily accessible shelves in the facility office
- 2.e. One large capacity portable  $CO_2$  fire extinguisher is available and is stored in the facility office.
- 2.f. Edlow believes that a geiger counter provides an effective tool for monitoring  $U_3O_8$  contamination which is more versatile (and therefore of greater practical use with a wide variety of test media) than smear testing.
- 2.g. The various aspects of the facility's security system are tested weekly to confirm its integrity.
- 3.a. The Edlow personnel listed in our application have had more than adequate training to cope with the kinds of accidents which might reasonably be expected to occur with drummed  $U_3O_8$  housed in 20' aluminum clad shipping containers which are stored outside away from any fire hazard.
- 3.b. Our site manager is Robert Priester of St. Louis, Missouri. Mr. Priester received his storage facility training from our previous site manager during the course of providing back-up assistance over a several month period. Mrs. Kathy Priester is a qualified alternate site manager.
- 3.c. Mr. Norman Ravenscroft, our Radiation Safety Officer (RSO), is a Vice President of the Company and has complete authority to take any actions required to terminate immediately any activity that could be a threat to health and safety or to the environment. Mr. Ravenscroft is accessible to the site manager and our security company 24 hours per day. In Mr. Ravenscroft's absence, Dr. Robert Rich is authorized to act as RSO.
- 4. The Edlow site has two operable geiger counters except for short periods of time when one has been sent out for calibration.
- 5. All warehouse personnel have been trained in accordance with 10 CFR 19.12. Retraining takes place on an as-needed basis throughout the year.
- 6. Not applicable.

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7. Seals are checked at least once per month on all accessible  $U_3O_8$  storage containers to confirm that there has been no tampering with inventory.
8. See items 2.a through 2.i on the "Warehouse Audit Checklist" given in Appendix A to the Edlow Warehouse Manual submitted in January 1985 with our application for license renewal.
9. Not applicable.

Please confirm that NRC will permit Edlow the time requested for an orderly phase-out of its East St. Louis storage facility. I will continue to keep you informed as we proceed toward closure of our facility.

Sincerely,



Robert A. Rich  
Executive Vice President