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→ Docket 40-2061

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DOCKET NO.: 40-2061

LICENSEE: Kerr-McGee Corporation

SUBJECT: AMENDMENT OF WEST CHICAGO LICENSE TO PERMIT BUILDING DISMANTLING

I Background

By letter dated March 28, 1980, Kerr-McGee (KM) requested permission to dismantle Building No. 1 at their West Chicago Site, with the work to be done by Chem Nuclear under contract to KM. Shortly after the request was made, the KM contract with Chem Nuclear was terminated. NRC action on the application was delayed until a new contractor could be found or other arrangements made by KM. In late 1980, KM decided to use its own employees for the West Chicago decommissioning work with technical support supplied by Catalytic, Inc. The NRC review of the application was begun again and KM was asked to confirm that they would be following the previously approved health physics plan for decommissioning work. KM confirmed that the health physics program would be followed and, in a letter dated March 24, 1981, submitted additional information on their training programs and on the revised organizational structure for the West Chicago Project. By letter dated March 25, 1981, KM requested that dismantling of Building No. 3 and its auxiliary structures also be approved. The two requests are being considered together in the current staff review.

The buildings that KM proposes to demolish are in a bad state of repair. A portion of the roof of Building No. 3 collapsed about two years ago and other portions of both buildings are near collapse. Demolition of the buildings now will remove the hazard of further collapse, will improve the appearance of the property and will not prejudice any disposal alternatives which may be selected in the future for contaminated material at the West Chicago site.

II Scope of Review

The information reviewed by the staff includes the KM requests dated March 28, 1980 and March 25, 1981, the Radiological Program Plan as approved by Region III (letter from James G. Keppler, Director, Region III Office of Inspection and Enforcement dated August 29, 1979), and the KM letter dated March 24, 1981 containing answers to questions posed by the NRC staff.

III Discussion of Review

The review focused primarily on three important areas which were project management, radiological health and safety and employee training. These areas of concern are discussed below:

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1. Project Management

Three positions in the management at West Chicago appear important to overall project safety. These positions are the Project Manager, the Project Superintendent and the Health Physicist.

The Project Manager's qualifications include fourteen years' experience in maintenance and construction work at the West Chicago plant plus an additional 8 years of experience in maintenance and construction work at the Sequoyah UF₆ production plant. This work history should ensure that the Project Manager has more than satisfactory practical experience and is also completely familiar with the West Chicago site.

The Project Superintendent, while not familiar by past work with the West Chicago site, has years of experience in heavy construction in Kerr-McGee mines. This experience should be directly applicable to the building dismantling work at West Chicago.

The Health Physicist, while not a board certified health physicist, has a B.S. degree in engineering, at least seventeen weeks of formal training in health-physics and about four years of experience in performing the duties of a health physicist. He has been stationed at West Chicago since October 1979, and therefore is familiar with the site and its particular problems.

Based on their training and experience, it is concluded that the Project Manager, Project Superintendent and Health Physicist are well qualified for their positions at West Chicago.

To assure that project management capability is not downgraded during the course of the work, KM will be required by license condition to inform I&E Region III if any of the key management people are replaced during the course of the project.

2. Radiological Health and Safety

Prior to the start of decommissioning work at West Chicago in 1979, the Region III Office of Inspection and Enforcement, with NMSS concurrence, had approved the KM program for radiological health and safety protection at the West Chicago site. The approved plan relied on Chem Nuclear, under contract to KM, to provide much of the health physics surveillance. In January 1981, after the contract with Chem Nuclear had been terminated, KM stated that they planned to proceed with the work using the previously approved health physics plan. Under the plan, KM will be responsible for all health physics functions including:

1. Maintaining an adequate supply of disposable anti-contamination clothing and expendable supplies.

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2. Source checking radiation detection equipment.
3. Training of personnel.
4. Performing radiological surveys on all equipment, tools, vehicles, packages, and waste which leaves the area.
5. Maintaining daily dosimeter reading records.
6. Issuance of TLD's to all personnel who routinely work on site.
7. Maintaining the respiratory protection equipment.
8. Changing TLD's monthly, or more often if needed.
9. Maintaining logs, records, and reports as required to demonstrate compliance with the radiological controls program.

The previously approved health physics surveillance program appears appropriate for use during the dismantling operations providing KM takes over all functions previously assigned to Chem Nuclear. To assure that KM does perform the functions a condition has been added to the amendment to clearly specify the KM responsibility.

3. Personnel Training

Many of the workmen involved in the dismantling operation at West Chicago will have had no prior experience in working with radioactive materials. An adequate training program is essential to help protect employee health and safety. KM has established training programs for on-site personnel as follows:

<u>Training Program</u>	<u>Positions Covered</u>
Orientation of New Employees	All on-site KM personnel
Radiation Worker Training	All on-site KM personnel
Radiation Protection Technology	All KM Health Physics Technicians
Safety Training Program	All KM personnel

Details of the training programs are given in a March 24, 1981 letter from KM. The training proposed is suitable for the work to be performed at the site.

III Conclusion and Recommendation

The demolition work proposed by KM should be performed in the near future to avoid accidental collapse of the buildings. KM has proposed to conduct the demolition work under an appropriate management structure with well qualified personnel in key positions. The health-physics program is suitable for the work to be done and the training program is adequate. The plan for the work to be done is limited to specified building and appropriate provisions have been described for rubble storage and water control.

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Demolition of the buildings is not expected to have any substantial adverse impact off-site. The overall appearance of the site will be improved when the demolition work is complete.

Approval of the request for permission to demolish the buildings, subject to the conditions added by the staff and listed in the proposed license amendment, is recommended.

The proposed amendment was discussed with C. Paperiello, Region III I&E, who was in favor of issuing the amendment. The amendment was also discussed with W. Shelley of NM who agreed with the conditions of the amendment.

Original Signed By:
W. A. Nixon

W. A. Nixon
Uranium Process Licensing Section
Uranium Fuel Licensing Branch
Division of Fuel Cycle and
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Original Signed by:

Approved By: _____
W. T. Crow
Section Leader

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