



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

APR 16 1992

License No. SMB-179
Docket No. 040-00672
Control No. 110636

Frank J. Vumbaco, Manager
Health and Radiation Safety
Nuclear Metals Inc.
2229 Main Street
Concord, Massachusetts 01742

Dear Mr. Vumbaco:

Subject: Meeting Summary and Request for Withholding Information from
Public Disclosure

This letter is in reference to the meeting held between representatives of Nuclear Metals, Inc. (NMI), your consultants, GZA GeoEnvironmental, Inc., (GZAGE), Industrial Compliance Technologies (ICT), Wastren Inc. (WI) and the Nuclear Regulatory Commission staff (NRC) at the NRC Region I Office in King of Prussia, Pennsylvania on December 17, 1991. We appreciate your initiative to outline your preliminary site characterization data and to discuss your development of the Holding Basin Remediation Project. A summary of the meeting is Enclosure 1.

After the meeting, we reviewed the meeting materials and the Massachusetts Contingency Plan (MCP) Phase II Comprehensive Site Assessment, Draft statement of work. We also discussed with the Commonwealth Department of Environmental Protection (DEP), some of your statements and concerns regarding State imposed scheduling conflicts with regard to clean-up of the holding basin. Representatives of DEP informed us by letter dated February 4, 1992 (Enclosure 2), that remediation of the holding basin can proceed prior to completion of the MCP process.

We recognize that the Holding Basin Remediation Project itself, and the need to inform and obtain approvals from other regulatory agencies, entails many difficulties and potential delays. We conclude, however, that a schedule for remediating the basin with identified milestones can be developed and implemented prior to formal approval by the Massachusetts DEP. Therefore, within sixty days of receipt of this letter, a schedule with milestone dates, including an end date, for removing and processing or disposing the radioactive material from the holding basin.

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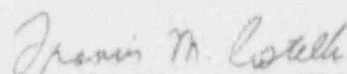
At our meeting, you also discussed the need for NRC to treat as proprietary, some specific information on the Holding Basin Remediation Project. We have reviewed NMI's affidavit dated March 10, 1992 regarding this matter. This request was made in accordance with 10 CFR 2.790 and it is supported by the contention that the information contains trade secrets and financial information. We have carefully reviewed your request and the information contained in the briefing marked as company private. We have concluded that with the exception of two introductory pages, namely holding basin chronology and materials deposited into the holding basin, the briefing material marked as company private may be withheld in accordance with 10 CFR 2.790 (a)(4). The two excepted pages as identified above should be released and placed in the Public Document Room. A copy of the briefing material has been marked to indicate the portions deleted as not appropriate for release, and is enclosed herewith as Enclosure 2.

In accordance with 10 CFR 2.790 (c), this expurgated copy is being forwarded to you as notice as to what information will be placed in the Public Document Room thirty days from the date of this letter. If within thirty days of this letter, you request withdrawal of these documents in accordance with 10 CFR 2.790(c), or provide additional reasons for the withholding of information not already expunged from Enclosure 3, your request will be considered in light of applicable statutes and regulations and a determination made whether the documents will be withheld from public disclosure or returned to you. You should also understand that the NRC may have cause to review this determination in the future, for example, if the scope of a Freedom of Information Act request includes your withheld information. In all review situations, if the NRC makes a determination adverse to the above, you will be notified in advance of any public disclosure.

With respect to the Holding Basin Remediation Project, if there are corrections to the meeting summary or if there are other difficulties with respect to development of a clean-up schedule, as requested here, please inform us in writing.

Thank you for your cooperation in this matter.

Sincerely,



John D. Kinneman, Chief
Site Decommissioning Management
Plan Task Force
Division of Radiation Safety
and Safeguards

Enc:

1. December 17, 1992 Meeting Summary
2. February 4, 1992 Letter from MA DEP
3. Expurgated Copy of NMI Briefing Materials

cc: R. DeRice, MA DEP (w/o Enclosure 2 and 3)

bcc w/enclosures:

R. Cooper

R. Bellamy

J. Austin

M. Roberts

MEETING SUMMARY

A licensing meeting was held on December 17, 1992, between representatives of the Nuclear Metals Inc. and three of their consulting firms and the Nuclear Regulatory Commission staff to discuss NMI preliminary site characterization data and to discuss their Holding Basin Remediation Project. The meeting is summarized below.

Meeting Participants

Nuclear Regulatory Commission

Malcolm Knapp, Director, Division of Radiation Safety and Safeguards, Region I
Richard Cooper, Deputy Director, DRSS, RI
Ronald Bellamy, Chief, Nuclear Materials Safety Branch, DRSS, RI
John Kinneman, Chief, Site Decommissioning Management Plan (SDMP) Task Force, RI
Mark Roberts, Project Manager, SDMP Task Force, RI
Mark Bowens, Health Physicist, SDMP Task Force, RI
Karla Smith, Regional Attorney, RI
Sam Nalluswami, Decommissioning and Regulatory Issues Branch, NMSS

Nuclear Metals, Inc.

Frank Vumbaco, Manager, Health and Radiation Safety
George Shinopoulos, Health and Radiation Safety

GZA GeoEnvironmental, Inc.

Sara R. Hanna

Wastren, Inc.

Ralph Grover

Industrial Compliance Technologies

John Litz

Meeting Discussions

At the meeting, NMI representatives presented a history of the Concord, Massachusetts site, a discussion of current site conditions, plans for further site characterization and two options for the removal of the radioactive waste on site.

- A. NMI has manufactured products from depleted uranium for a variety of purposes at this site since 1958. The facility is located on the side of a hill in a rural area of Concord, Massachusetts. The Assabet River is downhill from the facility and runs along the groundwater contours of the hill. Between 1958 and 1985 NMI discharged a neutralized pickling liquor containing depleted uranium and copper into an unlined holding basin. The basin was covered in 1986 with a synthetic material.

- B. The Commonwealth of Massachusetts, Department of Environmental Protection (DEP), has classified NMI as a "Priority disposal site" apparently because of the identification of volatile organic compounds in one or more groundwater samples. NMI stated that they did not believe that they could submit a holding basin remediation plan with a specific schedule to NRC until after site characterization had been completed and reviewed by NMI and formally approved by DEP. This concern is because NMI believes that DEP must approve all remedial actions at the site.
- C. Groundwater monitoring of the local area has shown uranium and nitrates in groundwater apparently due to material in the holding basin.
- D. Nitrate concentrations peaked in Well HB7 located within 15 feet of the holding basin in May 1984. After cessation of the discharges to the holding basin in 1985 and the covering of the holding basin in 1986, the nitrate concentrations in well HB7 decreased to only a few parts per million (ppm). In July 1988, nitrate levels peaked in well P1 located close to the river. The NMI consultants believe this shows that the nitrates travelled with the groundwater along the gradient of the site toward the river.
- E. Uranium concentrations peaked in Well HB7 in July 1983. As with the nitrates, the uranium concentrations in Well HB7 reduced to a few ppm after cessation of the discharges and the covering of the holding basin in 1986. To date, uranium has not been detected in well P1. River water has been tested downstream of the facility and no uranium was detected above background levels. Uranium concentrations have been detected in well SW2A located in the bedrock area. It is not known if the uranium detected in this well is naturally occurring from the holding basin.
- F. NMI has submitted to DEP for their review the Phase II Site Investigation in accordance with the MA Contingency Plan. Upon approval of the plan by DEP, NMI will install several new multilevel wells on the site to locate the leached uranium. The multilevel wells will aid in characterizing a vertical gradient for the groundwater if one exists. NMI agreed to provide to NRC all submittals to the MA DEP with respect to the Massachusetts Contingency Plan (MCP). NRC received the revised scope of work for Phase II of the MCP from NMI on 12/10/91.
- G. NMI has considered two options for site remediation. The first option is to dispose of the waste from the holding basin as low level radioactive waste. NMI has applied for, and received the necessary permits to dispose of the waste in this manner.
- H. The second option is to recycle the waste. A process was described but the details are withheld from public disclosure as permitted by 10 CFR 2.790, because it involves trade secrets and financial information.