



Commonwealth of Massachusetts

Executive Office of Environmental Affairs

**Department of  
Environmental Protection**

Metro Boston/Northeast Regional Office

William F. Weld  
Governor  
Daniel S. Greenbaum  
Commissioner

FEB 04 1992

Mr. John Kinneman  
Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

RE: CONCORD-Nuclear Metals,  
Inc./Status of Holding  
Basin Remediation Project  
DEP Case #3-0295

Dear Mr. Kinneman:

It is the Department of Environmental Protection's (the Department) understanding that Nuclear Metals, Inc. (NMI) met with representatives of your office in December 1991, to provide a status report on the holding basin remediation project and options for disposition of the holding basin material.

As you know, the Nuclear Metals, Inc. facility located in Concord, Massachusetts is a confirmed hazardous material disposal site as defined by Massachusetts General Law Chapter 21E, the "Massachusetts Oil and Hazardous Material Release, Prevention and Response Act". The NMI site is currently in Phase II of the Massachusetts Contingency Plan (MCP) undergoing a comprehensive site assessment.

It is the Department's position that remediation of the holding basin can proceed prior to completion of the MCP process. Furthermore, the agency would like to expedite removal of the holding basin contents. The MCP provides the flexibility to conduct interim remedial response actions on specific source areas of a disposal site. This can be implemented within the guidelines of the MCP as an interim measure, while continuing to proceed with the various phases of the MCP. The Interim Measures Policy was clarified for NMI in a Department correspondence dated November 27, 1990, a copy of which is enclosed.

The reason for the delay in conducting the holding basin remediation project is NMI's determination of what the final disposition of the material will be. NMI has been exploring two options relative to this matter. The first is out of state disposal at a facility in Clive, Utah. The second option is resource recovery in order to remove constituents such as copper and uranium for re-use. The resource recovery option is an attractive alternative compared to burial of the waste. The feasibility of resource recovery, however, has been explored by NMI for nearly ten years. The longer NMI waits to remediate the holding basin, the more costly both options become.

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The Department feels it is imperative that a decision regarding the ultimate disposition of the holding basin material be made, so that the remediation project can proceed. It is proposed that NRC set a realistic deadline for a decision in this regard and a schedule for implementing the remediation project.

In closing, please inform the Department regarding the status of the project as reported by NMI in December 1991. In addition, please indicate whether the imposition of a deadline is possible and/or likely to occur.

Thank you for your cooperation in this matter. If you have any questions, please contact Rodene DeRice at the letterhead address or phone (617) 935-2160.

Very truly yours,

*Rodene A. DeRice*

Rodene A. DeRice  
Environmental Analyst

*Stephen M. Johnson*

Stephen M. Johnson  
Acting Chief  
Site Management Branch

SMJ/RAD/ram

cc: DEP/BWSC/Boston, Attn: Jeffrey Krukonis  
Concord Board of Health, Attn: Mr. Brad Leach  
Mr. Frank Vumbaco, Nuclear Metals, Inc., 2229 Main St.,  
Concord, MA 01742  
Mr. Alan Edmond, Concord Town Manager, Town Hall, Concord,  
MA 01742  
Carol Amick, Low-Level Radioactive Waste Management Board,  
100 Cambridge St., Room 903, Boston, MA 02202