



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

FEB 11 1993

Mr. David Hunt  
Site Coordinator  
Division of Emergency and  
Remedial Response  
Ohio Environmental Protection Agency  
Southeast District Office  
2195 Front Street  
Logan, Ohio 43138-9031

Dear Mr. Hunt:

This is in response to your November 25, 1992 letter regarding Shieldalloy Metallurgical Corporation's (SMC's) technical basis document work plan for decommissioning of the Cambridge, Ohio site.

The Nuclear Regulatory Commission staff acknowledges the Ohio Environmental Protection Agency (OEPA) and U.S. Environmental Protection Agency (USEPA) jurisdiction over non-radiological issues at SMC's Cambridge, Ohio site. Consistent with your letter, NRC requests that OEPA continue to oversee the non-radiological aspects of decommissioning the Cambridge site. NRC encourages OEPA to put an Administrative Consent Order, or similar mechanism, into place with SMC that will allow the State of Ohio to formally approve remedial activities at the site. The site-wide decommissioning plan could provide a basis for a Consent Order. I anticipate that the site-wide decommissioning plan will be submitted to NRC for review in late fall 1993; following NRC approval of the Technical Basis Document. NRC believes that approval of the decommissioning process by the State of Ohio concurrent with NRC approval of the site-wide decommissioning plan will lead to timely, effective, and complete remediation of the Cambridge, Ohio site.

In its November 25, 1992, letter, OEPA also expressed concern about the potential impact of the Cambridge site on adjacent wetlands, and cited Federal Executive Order 11990, which requires Federal agencies to take action to minimize the loss or destruction of wetlands. NRC intends to fully address potential impacts of the Cambridge site on adjacent wetlands during review of the Technical Basis Document and the Site-Wide Decommissioning Plan, consistent with the National Environmental Policy Act (NEPA) and NRC's regulations implementing NEPA (10 CFR Part 51). Regarding the Federal Executive Order, section 1(b) of the Order states that it does not apply to the issuance by Federal agencies of permits or licenses for activities involving wetlands on non-Federal property. Thus, NRC believes that the Executive Order does not apply to NRC's licensing activities at the Cambridge site. However, as previously stated, potential impacts on adjacent wetlands will be addressed by NRC during review of SMC's proposed process for decommissioning the Cambridge site.

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Mr. David Hunt

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If you have any questions or need further information, please contact me at (301) 504-2522.

Sincerely,

Original Signed By

Meg Harvey, Project Manager  
Decommissioning and Regulatory  
Issues Branch  
Division of Low-Level Waste Management  
and Decommissioning  
Office of Nuclear Material Safety  
and Safeguards

cc:

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George V. Voinovich  
Governor

November 25, 1992

Ms. Meg Harvey, Project Manager  
Regulatory Issues Branch Section  
Office of Nuclear Materials Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

RE: SHIELDALLOY METALLURGICAL  
GUERNSEY COUNTY  
DERR CORRESPONDENCE

Dear Ms. Harvey:

On November 17, 1992 you and I discussed Shieldalloy's 11/3/92 response to the NRC's and Ohio EPA's comments on the July 1, 1992 Draft Technical Basis of Decommissioning Work Plan for the Shieldalloy Metallurgical Corporation (SMC) site in Cambridge, Ohio. The purpose of this letter is to summarize our understanding of the discussion.

First, we discussed SMC's response to the NRC's comment concerning evaluation of the maximally exposed individual. SMC stated that they would evaluate the maximally-exposed off-site resident for the long term risks the site poses. Ohio EPA had originally commented that for the site to be decommissioned for future unrestricted use, a future residential scenario had to be evaluated for the maximally-exposed on-site individual. You explained that for unrestricted future use the site risks are evaluated using an agricultural scenario. This scenario evaluates the risk to an individual that has a residence on the site, consumes crops and animals that are raised on the site, and drinks ground water from the site. You also stated that the agricultural scenario includes an intruder aspect which evaluates the risk to a person that digs on the site. This scenario appears to be a conservative and reasonable approach to evaluate the risks the site poses for unrestricted future use.

Secondly, we discussed SMC's response to Ohio EPA's comment. SMC indicates that they intend to address all contaminants of concern in the Technical Basis Document. You stated that it is acceptable for SMC to address non-radiological contaminants that may be present at the site during decommissioning activities. You indicated that the NRC has the preference that when the site is decommissioned for radiological aspects, it would also be decommissioned for non-radiological aspects for unrestricted use. I stated that I did not think that the State of Ohio would endorse this approach without some kind of legal agreement between Ohio EPA and SMC. Approval by the director of Ohio EPA for a site cleanup



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