

40-7708

FEB 08 1993

Umetco Minerals Corporation  
ATTN: Jay W. Davis, Senior Engineer  
P. O. Box 1029  
Grand Junction, Colorado 81502

Dear Mr. Davis:

SUBJECT: COMMENTS ON THE REMEDIAL ACTION PLAN FOR THE ELKEM METALS SITE

The Nuclear Regulatory Commission staff has completed its review of your December 11, 1992, submittal entitled "Project Plans for Remedial Action at Elkem Metals Company, Marietta, Ohio." The staff's comments are enclosed. The enclosure includes the comments that were discussed during our January 15, 1993, meeting, and additional comments on the project plans for the Elkem site generated after the January 15, 1993, meeting. Please submit a revised plan within 30 days of the date of this letter.

If you have any questions, please contact me on (301) 504-3438.

Original Signed By

Clayton L. Pittiglio, Project Manager  
Decommissioning and Regulatory  
Issues Branch  
Division of Low-Level Waste Management  
and Decommissioning  
Office of Nuclear Material Safety  
and Safeguards

Enclosure: As stated

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SUBJECT ABSTRACT: COMMENTS ON THE REMEDIAL ACTION PLAN FOR ELKEM METALS

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COMMENTS ON "PROJECT PLANS FOR REMEDIAL ACTION AT ELKEM METALS COMPANY,  
MARIETTA, OHIO"

PART 1, WORK PLAN

1. Page 3-1, Section 3.2  
This section should name the Site Health and Safety Officer (SHSO) for the project.
2. Page 4-3, Section 4.1.2  
This section should include a discussion of Umetco's plans for dealing with mixed waste.
3. Page 6-2, Table 6-1  
Table 6-1 should be revised to incorporate the unrestricted release criteria listed in "Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use or Termination of License for Byproduct or Source Material," August 1987. The criteria for both total beta-gamma and total alpha, assuming Th-232 contamination, are 1000 dpm/100 cm<sup>2</sup> average, and 3000 dpm/100 cm<sup>2</sup> maximum. In addition, the correct unrestricted release criteria for penetrating radiation are 5 uR/hr at one meter above background (average), and 10 uR/hr at one meter above background (maximum).
4. Page 6-4, Section 6.3.4  
This section should be revised to include the rationale for using two air samples.
5. Page 6-5, Section 6.5  
This section should be revised to include an explanation of how background levels will be calculated and applied when demonstrating compliance with unrestricted release limits.
6. Page 6-7, Section 6.6  
This section should be revised to include a commitment to use Draft NUREG-5849, "Manual for Conducting Radiological Surveys in Support of License Termination," to demonstrate compliance with the unrestricted release limits.
7. Page 9-1, Section 9.0  
This section should be revised to include a detailed discussion of Umetco's proposed schedule for decommissioning the Elkem site. The schedule should factor in an estimated time of up to two months for NRC's confirmatory survey.

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PART II, HEALTH AND SAFETY PLAN

8. Page 2-1, Section 2.2  
This section should to be revised to identify the SHSO, and describe the SHSO's qualifications.
9. Page 3-2, Section 3.2.1.1  
This section should indicate whether the new or the old 10 CFR Part 20 is going to be used. The selected version must be used in its entirety.
10. Page 7-4, Section 7.1.3  
Revise the "Surface Contaminations Limits" table to reflect the limits in Table 6-1 (see comment 2). Specifically, the maximum removable surface contamination limit, assuming Th-232 contamination, is 200 dpm/100 cm<sup>2</sup>, not 600 dpm/100 cm<sup>2</sup>.