

October 28, 1996

Mr. C. T. Bingham, P. E.
Director of Environmental Services
TRW, Inc.
1900 Richmond Road
Cleveland, OH 44124

SUBJECT: SCOPING SURVEY, FORMER TRW, INC., SITE AT 23555 EUCLID AVENUE,
CLEVELAND, OHIO (INSPECTION REPORT NO. 040-05699/96001(DNMS))

Dear Mr. Bingham:

This refers to the scoping survey inspection conducted July 24-25, 1996, at the Argo-Tech facility located at 23555 Euclid Avenue, Cleveland, Ohio. This also refers to your telephone conversation with Mr. E. L. Kulzer of my staff on August 21, 1996, and October 16, 1996, to discuss the laboratory results of the wipe samples and analyses of a polishing agent described below. Argo-Tech Corporation had purchased this property from TRW, Inc.; however, we understand that TRW, Inc., has assumed responsibility for the environmental problems at the site resulting from previous TRW, Inc., operations. A sample of the polishing agent was obtained by a separate site visit on October 7, 1996.

During the inspection, surveys were conducted and wipe samples were collected for laboratory analysis to determine the extent of residual thorium contamination from the formerly licensed activities at this site. With the exception of two areas described below, residual levels of thorium were not identified in excess of NRC's, "Guidelines for Decontamination of Facilities and Equipment prior to Release for Unrestricted Use or Termination of Licenses for Byproduct, Source, or Special Nuclear Materials," dated August 1987. Enclosed is a copy of our inspection report.

In Building 35 the inspectors identified 4 forty gallon drums of polishing agents labeled Compound #G-12-HD manufactured by Stanley Industries, Inc. of Warrenville Heights, Ohio. Surveys indicated that the drums contained radioactive material. Based on our review and analysis of a sample of the material, the NRC determined that the material meets the requirements of 10 CFR 40.13(c)(1)(vi), "Unimportant Quantities of Source Material." This regulation exempts from licensing, rare earth metals and compounds, mixtures, and products containing not more than 0.25 percent by weight thorium, uranium, or any combination of these.

In addition, a single piece of radioactive contaminated sheet metal (2 feet x 1 foot) was discovered in the Metallurgical Lab (Room 2465C) in Building 24, and was presumed to exceed the unimportant quantities specified in 10 CFR Part 40.13. It was presumed to exceed the unimportant quantity limit based on

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a contact reading of 250 microrontgens per hour (mR/h), versus background readings of 5-13 mR/h. However, an unimportant quantity by definition is that the source material in the alloy should be less than one-twentieth of one percent (0.05 percent) by weight. We are presuming the radioactive material in the sheet metal is thorium, and it is in a quantity greater than 0.05 percent by weight, which are both consistent with the licensed activities that took place at this location. As such, this piece of contaminated metal must be properly disposed of at an approved radioactive waste disposal facility. However, if you choose to conduct tests of the piece of sheet metal, and can show that it has a source material content of less than 0.05 percent by weight, then we will have no further concern regarding the metal, and you may keep it or dispose of it as ordinary waste.

It is also the position of the NRC that no additional surveys need to be performed at your facility. The scope of our surveys were sufficient to indicate that in all likelihood, the metal sheet that was found was the only one at the facility, and did not indicate that additional contamination would be expected to be found. Therefore, pending your disposal of the single piece of sheet metal, or evidence to support that it qualifies as an unimportant quantity, the NRC has no further regulatory concerns regarding this facility. Please provide us with intended action regarding the sheet metal within 45 days of the date of this letter.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be placed in the NRC Public Document Room. If you have any questions pertaining to this matter, please contact Mr. E. L. Kulzer at (630) 829-9875 or Mr. W. G. Snell of my staff at (630) 829-9871.

Sincerely,

Original Signed by R. Caniano for
Cynthia D. Pederson, Director
Division of Nuclear Materials Safety

Docket Nos. 040-05699 (Terminated)
040-00000 (Terminated)
040-06870 (Terminated)

License Nos. 34-05619-01 (Terminated)
C-05200 (Terminated)
STB-00663 (Terminated)
C-04526 (Terminated)
C-03245 (Terminated)
C-04756 (Terminated)

Enclosure: Inspection Report
No. 040-05699/96001 (DNMS)

cc w/encl: F. Robel, Argo-Tech Corp.

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T. Bingham

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