



40-7604

UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

December 10, 1996

Mr. James W. Walpole
Plant Manager
BP Chemicals, Inc.
Ft. Amanda Road
P.O. Box 628
Lima, Ohio 45802-0628

SUBJECT: BP CHEMICALS, INC. - AMENDMENT NO. 10 TO ESTABLISH A PROCEDURE AND
PROTOCOL FOR NRC REVIEW AND APPROVAL OF PROPOSED FIELD CHANGES FOR
THE MIXED WASTE POND CLOSURE PROJECT

Dear Mr. Walpole:

In your letter of October 24, 1996, you requested that the Nuclear Regulatory Commission amend BP Chemicals, Inc.'s (BPCI's) license (SUB-908) to establish a procedure and protocol for NRC review and approval of proposed field changes, which may be required during the implementation of the mixed waste pond closure activities. In your letter, you proposed to use your Administrative Procedure No. AP-02 (AP-02) entitled "Field Changes", as your change protocol.

According to AP-02, the BPCI project manager would determine whether field changes are major or minor. Major field changes are changes that meet one or more of the following criteria:

- (a) Affect the quality of the results achieved;
- (b) Cause a significant change in the project cost;
- (c) Cause a significant change in the project scope;
- (d) Cause a significant delay in the schedule;
- (e) Result in a significant deviation from documentation approved and referenced in License No. SUB-908, and all amendments thereto or the Ohio EPA approved closure plan;
- (f) Has any potential negative impact on safety or environment.

Major field changes would be submitted to NRC for review and approval. Minor changes are changes that do not meet any of the criteria (a) through (f) listed above, and would not require NRC review and approval.

For the minor field changes, BPCI would document the changes and report them to the NRC in progress reports.

The field change protocol procedure addresses potential impacts related to the cost, scope, schedule, existing license conditions and approved plans, and the environment. The NRC staff reviewed the proposed field change protocol and evaluated BPCI's review process and organizational responsibilities related to defining changes as major or minor. The staff also reviewed the method that will be used by BPCI to document changes. The staff discussed with Mr. William M. Rupert, the potential for delays if a field change resulted in the need for a license amendment. Based on the above, the staff finds the proposed field change procedure acceptable.

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The NRC staff has considered the potential for environmental impact of the license modification and has determined that the amendment will not result in any significant environmental impact.

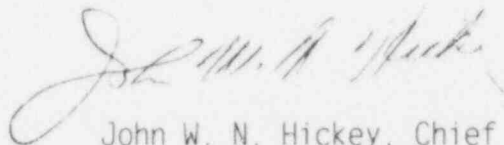
Therefore, the requested license amendment is covered by the conditions of the categorical exclusion of 10 CFR 51.22(c)(11), which are: (i) there is no significant change in the types or significant increase in the amounts of any effluent that may be released offsite; (ii) there is no significant increase in individual or cumulative occupational radiation exposure; (iii) there is no significant construction impact; and (iv) there is no significant increase in the potential for, or consequences from, radiological accidents.

New license condition 25 incorporates the requirements to address the approval of the proposed field changes.

All other conditions shall remain the same.

Please carefully review the enclosed amendment including the new license condition. If you have any questions, immediately notify M. (Sam) Nalluswami at 301-415-6694.

Sincerely,



John W. N. Hickey, Chief
Low-Level Waste and Decommissioning
Projects Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

Docket No. 040-07604
License No. SUB-908

Enclosure: Amendment No. 10 with
New License Condition 25

cc: Jim Ottarson, Ohio EPA
Ruth Vandegrift, Ohio DOH
David Rosebrock, Combined Health Dt.

The NRC staff has considered the potential for environmental impact of the license modification and has determined that the amendment will not result in any significant environmental impact.

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[ORIGINAL SIGNED BY:]

John W. N. Hickey, Chief
Low-Level Waste and Decommissioning
Projects Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

Docket No. 040-07604
License No. SUB-908

Enclosure: Amendment No. 10 with
New License Condition 25

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Ruth Vandegrift, Ohio DOH
David Rosebrock, Combined Health Dt.

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