

May 16, 1995

Mr. Brian Blair
Ohio Environmental Protection Agency
Division of Emergency and Remedial Response
Southeast District Office
2195 Front Street
Logan, OH 43188

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION ENVIRONMENTAL IMPACT STATEMENT
FOR SHIELDALLOY METALLURGICAL CORPORATION, CAMBRIDGE, OHIO

Dear Mr. Blair:

In a letter to the U.S. Nuclear Regulatory Commission staff dated January 25, 1995, Shieldalloy Metallurgical Corporation (SMC) requested that the subject environmental impact statement (EIS) be modified to include an analysis of the relocation of off site slag to the SMC, Cambridge, Ohio, site. This EIS is being developed by NRC staff to evaluate decommissioning alternatives for the two slag piles at this site. On April 20, 1995, PTI Environmental Services, Inc. (PTI), acting on behalf of legal counsel for SMC and Cyprus Foote Mineral Company, submitted a Preliminary Draft Feasibility Study (FS) for the SMC, Cambridge site to the Ohio Environmental Protection Agency. The FS included additional information concerning this requested revision to the scope of the EIS. As a result of this request and the information in the FS, NRC staff intends to revise the scope of the EIS as requested by SMC. The enclosed draft Federal Register notice, announcing the change in scope, is forwarded for your review and comment. Your comments are requested by June 2, 1995. Please provide your comments to Mr. Robert Nelson of my staff.

If you have any questions, please call me at (301) 415-7297 or Mr. Nelson at (301) 415-6697.

Sincerely,
[Original signed by]
Michael F. Weber, Chief
Low-Level Waste and Decommissioning
Projects Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

Docket No.: 040-08948

License No.: SMB-1507

Enclosure: As stated

Identical letters sent to:

J. Wendel, US EPA; H. Brugger, Ohio Dept of Health; J. Blake, US Army Corps of Engineers; and W. Kurey, US Fish and Wildlife Service

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* See previous concurrence

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NAME	RNelson		JKennedy	RFonner		MWeber			
DATE	5/10/95	H	5/11/95	5/12/95		5/16/95		/	/95

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LSS : YES ☐ NO ☒

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INTERAGENCY REVIEW DRAFT

[7590-01]

NUCLEAR REGULATORY COMMISSION

Decommissioning of Shieldalloy Metallurgical Corporation's
Facility in Cambridge, Ohio: Notice of Revision to the Scope of an
Environmental Impact Statement

AGENCY: Nuclear Regulatory Commission.

ACTION: Notice of intent to revise the scope of an environmental impact
statement (EIS).

SUMMARY: The U.S. Nuclear Regulatory Commission (NRC) intends to revise the
scope of an EIS for decommissioning Shieldalloy Metallurgical Corporation's
(SMC's) facility located in Cambridge, Ohio.

ADDRESSES: Documents referred to in this notice may be examined at the
Commission's Public Document Room (PDR), 1717 H Street, NW., Washington, DC,
or at the local PDR located in the Guernsey County District Public Library,
800 Steubenville Avenue, Cambridge, Ohio.

FOR FURTHER INFORMATION CONTACT: Robert A. Nelson, Division of Waste
Management, Office of Nuclear Material Safety and Safeguards, Washington, DC
20555, Telephone: 301-415-6697.

SUPPLEMENTARY INFORMATION

Background

On November 28, 1993, the NRC published in the Federal Register (58 FR 62384) a Notice of Intent to prepare an EIS for the proposed stabilization of slag piles containing radioactive waste, located at the SMC, Cambridge, Ohio, facility, and to conduct scoping for the EIS. NRC's requirements for EIS scoping are contained in 10 CFR 51.28 and 51.29. The scoping process included a public scoping meeting held in Byesville, Ohio, on December 13, 1993. NRC also invited the public and interested agencies, organizations, and individuals to submit written suggestions and comments for consideration in the scoping process. The EIS scoping process culminated with a Summary Report published in May 1994. The Summary Report identified five alternatives to be considered in the EIS. These were: (1) onsite stabilization and disposal (the licensee's proposed action); (2) off site disposal; (3) onsite separation processing with off site disposal; (4) onsite dilution processing and disposal; and (5) no action.

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In a possibly related matter, NRC determined in 1993 that slag from the site, when it was owned by Foote Mineral Company (FMC) may have been used as fill at off site locations. Subsequent inspections by NRC identified 15 locations with slag having elevated levels of radioactivity. Radiation surveys and slag analyses conducted in 1994 by the NRC indicate that the slag does not pose an immediate health and safety risk to residents. However, some action may be necessary at specific locations to minimize the long-term risk associated with the slag. To determine the nature and extent of the off site slag contamination, Cyprus Foote Mineral Company (CFMC) (successor to FMC), is conducting an investigation. Any needed remediation will be based on the further measurements and analyses conducted by CFMC and the review of this information by the NRC.

In addition to the issues that fall under NRC's jurisdiction, there are other environmental issues associated with decommissioning the Cambridge site that are regulated by other State and Federal agencies, including the U.S. Environmental Protection Agency and the Ohio Environmental Protection Agency (OEPA). As a result of these other environmental issues, SMC and CFMC are conducting a remedial investigation/ feasibility study (RI/FS) for the SMC, Cambridge facility. The RI/FS is in response to a consent order for a preliminary injunction agreed to, in principle, by OEPA, SMC, and CFMC. This RI/FS concerns the remediation of hazardous wastes, industrial wastes, water pollution, and other wastes associated with the Cambridge facility. Some of these wastes may be located in the two slag piles. Because the RI/FS is expected to result in information needed by NRC to develop the EIS, NRC staff is participating in discussions between the companies and OEPA concerning the development of the RI/FS for this site.

Revision to the Scope of the EIS

At meetings with the OEPA in December 1994, attended by NRC staff, SMC representatives indicated that decommissioning alternatives under consideration for the SMC, Cambridge, Ohio, facility should include the relocation of off site slag that may have originated from this facility. Because this new alternative would impact the EIS under development by NRC, NRC staff requested a formal proposal concerning the inclusion of this alternative from SMC on January 5, 1995. In a letter dated January 25, 1995, SMC requested that the EIS be modified to include an analysis of the relocation of the off site slag to the SMC, Cambridge, Ohio, site.

On April 20, 1995, PTI Environmental Services, Inc. (PTI), acting on behalf of legal counsel for SMC and CFMC, submitted a Preliminary Draft

¹ Documents (letters and reports) related to the slag review program are available for public review at the Guernsey County District Public Library, 800 Steubenville Avenue, Cambridge, Ohio.

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Feasibility Study (FS) for the SMC, Cambridge site to OEPA. The FS included additional information concerning this requested revision to the scope of the EIS. In the discussion of this alternative, the FS assumes that 10,000 yd³ of slag, that may have been produced at the site and used off site, will be excavated and relocated to the West Slag Pile. Only slag that was originally produced at the site and is similar to slag in the West Slag Pile would be brought back onsite. The FS estimates an area of 75,000 ft² for the relocated slag. By comparison, the existing West Slag Pile has an estimated volume of approximately 220,000 yd³ covering an area of 359,000 ft². Because the characterization of the off site slag is still being conducted by CFMC, the volume and radiological composition of this slag has not been determined.

10 CFR 51.29(c) states that the appropriate NRC staff director may, at any time prior to the issuance of the draft EIS, revise the scoping determinations, as appropriate, if substantial changes are made in the proposed action, or if significant new circumstances or information arise which bear on the proposed action or its impacts. Under the provisions of §51.29(c), the staff has determined that the licensee's proposed new alternative, concerning the relocation of the off site slag, constitutes a significant change in the proposed action. Therefore, the staff intends to revise the scope of the EIS to examine the potential environmental impacts of this alternative in addition to those alternatives identified in the Scoping Process Summary Report. The revised list of alternatives are described below.

Decommissioning Alternatives to be Considered

1. Onsite stabilization and disposal (licensee's proposed action)
 - a. Without off site slag - Radioactive contamination would be consolidated, stabilized, covered, and graded in a manner to provide long-term protection against wind and water erosion and to minimize groundwater contamination. This alternative would also likely include land use restrictions and/or other institutional controls to prevent or reduce potential intrusion into the waste and to monitor the long-term effectiveness of the disposal and take mitigative measures as necessary to protect the public and environment.
 - b. With off site slag - This alternative is similar to Alternative 1.a with the addition of approximately 10,000 yd³ of off site slag to the West Pile before stabilization and capping.
2. Off site disposal - Radioactive contamination would be exhumed from the site and disposed off site at a licensed low-level waste disposal facility. Radioactive contamination onsite would be reduced down to levels that NRC presently considers acceptable for release for unrestricted use (e.g., 10 pCi/g total uranium (with decay products) and 10 pCi/g thorium-232 and thorium-228 and other criteria such as exposure rate and radon concentrations).

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3. Onsite separation processing with off site disposal - Radioactive contamination would be processed using physical or chemical methods to separate more highly concentrated contamination from lower concentrations that could be stabilized onsite. Higher concentration wastes would be sent off site to a licensed disposal facility. Radioactive contamination onsite would be reduced down to levels that NRC presently considers acceptable for release for unrestricted use.
4. Onsite dilution processing and disposal - Existing radioactive contamination would be blended with clean fill to reduce average concentrations of uranium and thorium to levels that NRC presently considers acceptable for release for unrestricted use. Diluted contamination would then be graded onsite and released for unrestricted use.
5. No action - Radioactive contamination would be abandoned in its present configuration without any additional processing or stabilization. This alternative does not consider any protective measures, such as land use restrictions or other institutional controls, that might mitigate or prevent intrusion into the waste or long-term release and transport of contamination in the environment. (The no action alternative is only included for the purpose of comparison with the other alternatives.)

The EIS will evaluate these alternative decommissioning approaches with respect to: (1) the incremental impact to workers, members of the public, and the environment, both radiological and non-radiological, resulting from each alternative; and (2) the costs associated with each alternative. The EIS will also include a comparative evaluation of the decommissioning approaches based on the associated impacts and costs. The evaluation is described in great detail in the November 28, 1993, Federal Register notice (58 FR 62384).

EIS Development Schedule

NRC intends to prepare and issue for public comment a draft EIS in December 1995. The comment period would be for 90 days. The final EIS is scheduled for publication in October 1996. This schedule has been delayed because information resulting from the RI/FS is needed to conduct the EIS analyses. Further delays may occur if needed information is not submitted in timely manner. Subsequent to completion of the final EIS, the NRC would review and act on a license amendment from the licensee requesting authorization for decommissioning the site, including the decommissioning plan as required in 10 CFR 40.42(d). Depending on the resolution of the licensee's financial restructuring under Chapter 11 of the bankruptcy code, the NRC may terminate or postpone development of the EIS.

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Dated at Rockville, Maryland, this _____ day of June 1995.

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

Michael F. Weber, Chief
Low-Level Waste and Decommissioning
Projects Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

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