

ARGONNE NATIONAL LABORATORY

9700 SOUTH CASS AVENUE, ARGONNE, ILLINOIS 60439

November 14, 1984

Mr. W. A. Nixon
Division of Fuel Cycle and Material Safety
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Bill:

In response to your request, we have estimated the time and effort that would be required to prepare a Supplemental EIS (SEIS) for the West Chicago Kerr-McGee facility, with particular focus on the issues raised by the Illinois Attorney General.

We estimate that it will take approximately one year to publish a Draft SEIS (see proposed schedule--Attachment 1). Please note that only a small portion of this time is required by ANL for the actual analyses (about 3 months). The rest of the time is needed for coordination, reviews, and concurrence by the various participating parties.

The ANL effort to support preparation of the Draft SEIS is estimated to be about 2.8 person-years, or a total cost of \$250 K, of which 180 K would be needed in FY85 and 70 K in FY86 (Attachment 2). The scope of the Final SEIS will depend primarily on the extent and nature of the comments on the DSEIS; therefore, schedule and cost for the Final SEIS will require further discussion.

The abovementioned schedule and cost estimates are based on several assumptions (Attachment 3). Key assumptions include:

- 1) A maximum of five major alternatives will be analyzed, including 2 at the West Chicago site and one at each of 3 alternative sites.
- 2) The State of Illinois will identify the alternative sites to be analyzed in detail and compared to the West Chicago site.
- 3) The focus of the analysis will be on the major issues of groundwater contamination, containment system stability, radiological impacts, land use/socioeconomic impacts, and dollar costs.

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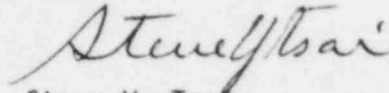
Mr. W.A. Nixon

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If you have any questions or need any further information, please call.

Sincerely,

A handwritten signature in cursive script, appearing to read "Steve Y. Tsai".

Steve Y. Tsai
Environmental Research Division

SYT:mz

cc: A. J. Dvorak
P. F. Gustafson
P. A. Merry-Libby

Attachment 1: PROPOSED SCHEDULE
Supplemental Environmental Impact Statement,
Decommissioning of the Rare Earths Facility
at West Chicago, Illinois

Primary Responsibility	Activity	Completion Date
NRC	Approve Supplemental EIS Approach	Dec. 7, 1984
IL/NRC	Identify and Concur on Alternative Sites	Jan. 30, 1985
IL	Provide ANL With Alternative Site Data*	Jan. 30
ANL	Develop Conceptual Designs for Alternative Sites	Feb. 28
IL/NRC/ANL/ Kerr-McGee	Review and concur on Conceptual Designs for Alternative Sites.	Mar. 29
IL/NRC/ANL	Concur on (1) Time Frames for Analysis, (2) Major Issues, and (3) Depth of Analysis	Mar. 29
ANL	Prepare Preliminary Draft Supplemental EIS (PDSEIS) - I	Jun. 28
NRC/IL/ Kerr-McGee	Review PDSEIS-I	Jul. 19
NRC/IL/ Kerr-McGee/ANL	Concur on Revisions	Jul. 26
ANL	Prepare PDSEIS-II	Aug. 27
NRC/IL/ Kerr-McGee	Review PDSEIS-II	Sep. 18
NRC/IL/ Kerr-McGee/ANL	Concur on Revisions	Oct. 1
ANL	Prepare Camera-Ready DSEIS	Oct. 15
NRC	Concurrence, Prepare Letters, etc.	Nov. 8
NRC	Print and Distribute DSEIS	Nov. 20
NRC	Issue Federal Register Notice of Availability	Nov. 27
IL/Public/ Kerr-McGee	Review/Comment on DSEIS	Jan. 1986
NRC	Issue Final SEIS	Jul.
NRC	Record of Decision	Aug.

*For any new sites and/or new data on previously considered sites.

Attachment 2: ESTIMATE OF ANL COSTS
to Prepare Draft Supplemental EIS.

Effort (Person-Years)

	<u>FY 85</u>	<u>FY 86</u>
Direct Scientific/Technical	1.7	0.6
Other Direct	<u>0.3</u>	<u>0.2</u>
Total	2.0	0.8

Cost (\$1,000)

	<u>FY 85</u>	<u>FY 86</u>
Direct Salaries	104.1	41.3
M & S	1.0	1.0
ADP Support	4.0	1.0
Subcontracts	0	0
Travel (Domestic)	1.0	1.0
Indirect Labor Costs	32.9	13.9
G & A (19.6%)	<u>34.5</u>	<u>14.1</u>
Total	177.5	72.3

Attachment 3: KEY ASSUMPTIONS
for Supplemental EIS

1. A maximum of five alternatives at four sites (Kerr-McGee site and three alternative sites) will be analyzed in detail. Alternative sites should be at least as good as the Kerr-McGee site from a hydrogeological point of view.
2. The State of Illinois will identify, with NRC concurrence, the alternative sites to be analyzed in depth.
3. The proposed schedule envisions no out-of-state coordination/concurrence/review. If analysis of out-of-state site(s) is needed, more time and effort will be needed.
4. NRC and Illinois will concur on the time frames for the analysis and the assumptions regarding monitoring/maintenance/institutional controls. Under established policy, "long-term" means containment for at least 200 years and up to 1,000 years (per EPA uranium mill tailings regulations).
5. The major issues to be analyzed in depth are:
 - (a) Long-term groundwater contamination and containment system durability/ stability.
 - (b) Radiological impacts (near- and long-term).
 - (c) Land-use/socioeconomic impacts.
 - (d) Dollar costs (implementation costs and maintenance/monitoring costs)
6. The cost-benefit analysis will be a summary comparison of the results of abovementioned analyses of major issues.
7. The schedule assumes concurrent reviews of preliminary drafts by NRC, Illinois, and Kerr-McGee. Sequential reviews could extend the schedule greatly.
8. The schedule is based on no local (county, city, etc.) review of preliminary drafts and no public meetings. NRC will decide the level and timing of local participation in the decision-making process.