



NY 1/30/97

January 24, 1997

Docket No. 70-36

License No. SNM-33

Mr. Michael F. Weber, Chief
Licensing Branch
Division of Fuel Cycle Safety and Safeguards, NMSS
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: **Additional Assessment of 10 CFR Part 20.304 Burials (TAC NO. L30912)**

Dear Mr. Weber:

On September 13, 1996 CE requested a postponement in the decommissioning of the 20.304 disposal area. In your November 25, 1996 letter you denied our request for postponement based on the adequacy of the justification.

In order to address the factors described in the Timeliness Rule and other relevant factors such as those listed in 10 CFR 70.38(i), CE requests additional time to assess the disposal area. Additional assessment time is required to:

1. Review disposal records
2. Review site monitoring data including the 1982 NRC assessment
3. Review liability from previous facility owners
4. Review recently gathered hydrogeological data
5. Resolve issues with MO Department of Natural Resources

Based on this data assessment, conclusions can be drawn and the need for additional characterization of the area determined. We may also find that the NRC screening methods contained in draft NUREGS 1500 and 5512 provide sufficient guidance to support our initial conclusion. CE thus requests a meeting with the NRC to discuss a course of action to resolve this issue.

Sincerely,

COMBUSTION ENGINEERING, INC.

Robert W. Sharkey
Director, Regulatory Affairs

RA97/542

cc: Gary Shear, Region III

ABB CENO Fuel Operations

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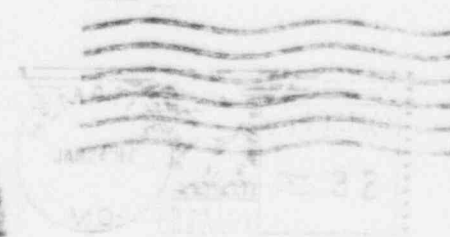
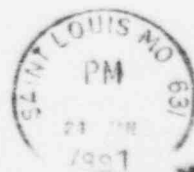
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