

40-9027

CABOT

January 31, 1997

Ms. Judith M. Greenwald
U.S. Nuclear Regulatory Commission
Low-Level Waste and Decommissioning Branch
Mail Stop T 7-F-27
Washington, D.C. 20555-0001

RE: CHANGES TO CABOT'S NRC MATERIAL LICENSE SMC-1562

Dear Ms. Greenwald:

As previously discussed, we request the items on the following pages be revised in our license.

We appreciate your support in addressing these issues.

Should you have any questions, please call me.

Sincerely,
CABOT PERFORMANCE MATERIALS

Kevin L. Holsopple

Kevin L. Holsopple
Radiation Safety Officer

Enclosure

cc: ATCampitelli
THOdle

/cas
nrc-0131.klh

9702180217 970131
PDR ADOCK 04009027
C PDR

NL10

1/1

Cabot Performance Materials
P.O. Box 1608
County Line Road
Boyertown, Pennsylvania 19512-1608
Phone: 610-367-2181



REQUESTED CHANGES TO LICENSE SMC-1562

Condition 14

Reword the condition to read: "The licensee's ALARA Review Committee shall meet at least annually to discuss appropriate radiological issues. The Committee membership shall include, as a minimum, the Radiation Safety Officer (RSO) and a member of plant management. The minutes of the Committee Meetings shall be documented and forwarded to the appropriate levels of management."

Note: The elimination of the radiological consultant from the Committee is consistent with the current requirement contained in License SMB-920.

Condition 15

Delete this license condition.

Note: It is not necessary to include this condition in the license because it is already contained in the License Renewal Application for SMB-920 (which included SMC-1562). The identical condition was removed from SMB-920.

Condition 16

Delete this license condition.

Note: This condition is not necessary because there is no work being performed with radioactive material at the Reading and Revere sites. Also, the requirements contained in 10CFR19 already define this requirement. The identical condition was removed from SMB-920.

Condition 17

Delete the license condition regarding bioassay sampling. Since there is no production work involved with radioactive material at either site, there is no need to impose this requirement. If an occasion should arise where a worker would spend consequential time handling radioactive material, then Cabot would include the individual(s) in the Whole Body Counting program in place for License SMB-920 at Boyertown.

Note: The similar license condition in the previous amendment for License SMB-920 was eliminated in the latest license renewal.

Condition 19

Item b.

Change the words "Sampling groundwater" to "Obtaining water samples".

Note: This change in language conforms to the sampling approach that Cabot has already been established and agreed upon.

Eliminate the requirement for analyzing for conductivity.

Note: Cabot does not know of any value that is added or regulatory requirement/limit addressed by analyzing for conductivity.

Item c.

Change the condition to read: "Performing a direct radiation survey at the boundaries of the dump site."

Note: This language is consistent and less prescriptive with the approach for performing radiation surveys.