

40-7604

**BP CHEMICALS**

BP Chemicals Inc.  
 Ft. Amanda Road  
 P.O. Box 628  
 Lima, Ohio 45802-0628  
 (419) 226-1200

VIA OVERNIGHT MAIL

Mr. Sam Nalluswami  
 Low-Level Waste and Decommissioning Projects Branch  
 Division of Waste Management  
 Office of Nuclear Materials and Safeguards  
 United States Nuclear Regulatory Commission  
 Two White Flint North  
 11545 Rockville Road  
 North Bethesda, MD 20852

November 26, 1996

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

Subject: Ohio EPA Approval of Field Changes

Dear Sir:

In accordance with the mixed waste pond closure project field change approval procedure (BPCI Administrative Procedure AP-02), BP Chemicals, Inc. (BPCI) previously submitted to NRC proposed field changes for your review. As you are aware, the same proposed field changes were also submitted to Ohio EPA. This letter is submitted to update NRC on the status of Ohio EPA field change review. The Following field changes have been reviewed and approved by Ohio EPA:

<u>Field Change #</u>	<u>Date Submitted</u>	<u>Date Approved</u>
003	11/11/96	11/21/96
004	11/11/96	11/21/96
006	11/13/96	11/18/96
007	11/13/96	11/18/96
008	11/13/96	11/18/96

A copy of each Ohio EPA approval is attached for your records.

BPCI will submit additional Ohio EPA approvals as received. To date, no proposed field changes have been rejected by Ohio EPA. If there are any questions, please give me a call at (419) 226-1299.

Sincerely,

William M. Rupert, PE  
 Project Manager

cc: Ed Kulzer, NRC Region 3  
 Ruth Vandegriff, Ohio Dept. of Health  
 James Ottarson, Ohio EPA

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BP CHEMICALS, INC.  
MIXED WASTE POND CLOSURE PROJECT

FIELD CHANGE REQUEST FORM

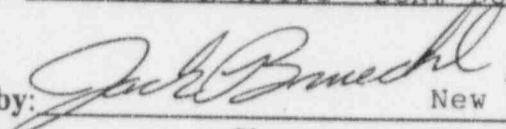
Field Change Number: 003 Date: 9/27/96

Subject: Anchor Trench Design

Description: Revise Anchor Trench Design and Backfill Plan

Justification: Constructability problems of original design. Place-  
ment and compaction of 1 - foot thick clay layers between  
synthetic layer on vertical plane of Anchor Trench is not  
practical.

Attachments: Dames & Moore ECN# BUF-003 and Calc.# BUF-96-107

Requested by:  FOR. New England Liner Systems, Inc. 9/20/96  
Signature Company Date

BPCI Project Approvals

Dames & Moore Robert R. Blackwelder NOT Yes No 9/27/96  
Certifying Engineer Signature Approval Date

BPCI Radiation NOT APPLICABLE Yes No ✓  
Safety Officer Signature Approval Date

BPCI HSE NOT APPLICABLE Yes No ✓  
Manager Signature Approval Date

BPCI Project Wile NOT Yes No 11/1/96  
Manager Signature Approval Date

Regulatory Agency Concurrence

Ohio EPA James M. Ottaviano Yes No 11/21/96  
Concurrence Signature Concur Date

NRC ✓ Yes No ✓  
Concurrence Signature Concur Date

# FIELD CHANGE REQUEST FORM

Requested by: Jack Benson      Sevenson      10/1/96  
Signature      Company      Date

## BPCI Project Approvals

Dames & Moore Robert R. Birkvedehl RT Yes No 10/7/96  
 Certifying Engineer Signature Approval Date

BPCI Radiation Safety Officer

NOT APPLICABLE

Signature

Yes No

Approval

Date

BPCI HSE Manager	<u>NOT APPLICABLE</u>	Yes	No	<u>✓</u>
	Signature	Approval		Date

BPCI Project Manager W. H. H. Yes No 11/1/96  
Signature Approval Date

Regulatory Agency Concurrence

Ohio EPA  
Concurrence

James M. [Signature]      Yes No      11/21/76  
Signature      Concur      Date

NRC Concurrence	Signature	Yes	No	Date
		Concur		

## FIELD CHANGE REQUEST FORM

NRC		Yes	No
Concurrence	Signature	Concur	Date

BP CHEMICALS, INC.  
MIXED WASTE POND CLOSURE PROJECT

FIELD CHANGE REQUEST FORM

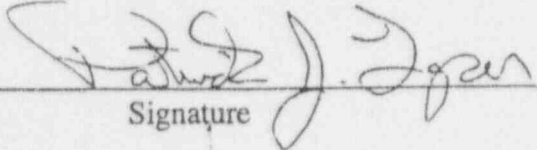
Field Change Number: 007 Date: 10/15/96

Subject: Clarification of Field Moisture Pass/Fail Criteria

Description: Interpret upper limit of the 0% to +4% optimum moisture content allowable range as being equivalent to actual field instrument readings up to +4.4%.

Justification: Bowser-Morner will report readings between +3.5% and +4.4% as +4% based on accepted practice of rounding for this test method. On this basis field instrument readings up to +4.4% will be passed by the QC contractor.

Attachments: \_\_\_\_\_

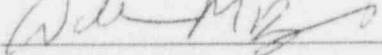
Requested by:  Bowser-Morner 10/15/96  
Signature Company Date

BPCI Project Approvals

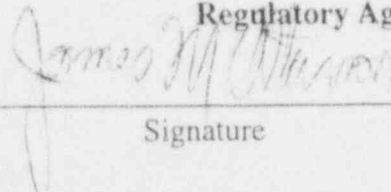
Dames & Moore Robert L. Blickmeyer BT Yes No 10-15-96  
Certifying Engineer Signature Approval Date

BPCI Radiation NOT APPLICABLE Yes No —  
Safety Officer Signature Approval Date

BPCI HSE NOT APPLICABLE Yes No —  
Manager Signature Approval Date

BPCI Project  Yes No 10/15/96  
Manager Signature Approval Date

Regulatory Agency Concurrence

Ohio EPA  Yes No 11/3/96  
Concurrence Signature Concur Date

NRC Yes No  
Concurrence Signature Concur Date

BP CHEMICALS, INC.  
MIXED WASTE POND CLOSURE PROJECT

FIELD CHANGE REQUEST FORM

Field Change Number: 008 Date: 10/15/96

Subject: Revise Specification 02220, Excavation and Backfill

Description: In Section 3.2.8 (c) change the percent compaction from 95 to 90 percent of optimum as determined by ASTM D1557 (Modification Proctor).

Justification: Results of test fill #2 indicated that satisfactory hydraulic conductivity (less than  $10^{-7}$  cm/sec) for clay liner can be achieved with 90% compaction to ASTM D1557.

Attachments: Revised Specification Page 02220-8

Requested by: Robert Blickwedehl Dames & Moore 10/15/96  
Signature Company Date

BPCI Project Approvals

Dames & Moore Robert P. Blickwedehl Yes No 10-15-96  
Certifying Engineer Signature Approval Date

BPCI Radiation NOT APPLICABLE Yes No —  
Safety Officer Signature Approval Date

BPCI HSE NOT APPLICABLE Yes No —  
Manager Signature Approval Date

BPCI Project W. M. B. Yes No 10-15-96  
Manager Signature Approval Date

Regulatory Agency Concurrence

Ohio EPA James M. Harrison Yes No 11/15/96  
Concurrence Signature Concur Date

NRC — Yes No —  
Concurrence Signature Concur Date