



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 13, 1996

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

Subject: Mixed Waste Pond Closure Project
Field Change No. 008

Dear Sir:

In accordance with the mixed waste pond closure project field change approval procedure (BPCI Administrative Procedure AP-02), BP Chemicals, Inc. (BPCI) herewith submits for NRC review proposed Field Change No. 008. This field change is requested to revise Specification 02220, Excavation and Backfill to allow the contractor to compact clay to 90 percent modified proctor (ASTM D1557) based on the results of Test Fill pad #2.

Attached is a copy of the revised specification page 02220-8 incorporating the change.

A copy of this field change request is also being submitted to 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 Vandegrift, 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: 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 Blickvedehl Dames & Moore 10/15/96
Signature Company Date

BPCI Project Approvals

Dames & Moore Robert P. Blickvedehl 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 — Yes No
Concurrence Signature Concur Date

NRC — Yes No
Concurrence Signature Concur Date

EXCAVATION AND BACKFILL

- b. Acidity range (pH) of 5.5 to 7.5.
 - c. Containing a minimum of 4 percent, and a maximum of 25 percent inorganic matter.
- 3.2.8 Backfill shall be placed symmetrically to prevent eccentric loading upon or against structures.
- a. Backfill, including trench backfill, shall be placed in horizontal layers not to exceed eight inches in loose thickness and shall have the proper moisture content for the required degree of compaction and the top one inch of subgrade shall be scarified prior to backfill placement.
 - b. Large fills compacted with tractor drawn compactors may be placed in layers not to exceed 8 inches in loose thickness, subject to the provision of 3.2.7 a, and a uniform surface shall be maintained during compaction operations in order to insure compaction of the entire layer.
 - c. Each layer shall be compacted by hand or machine tampers or other suitable equipment to at least 90 percent of maximum dry density at optimum moisture content to +4 percent of optimum as determined by ASTM D-1557 unless noted otherwise on drawings. Each layer shall achieve the required density before proceeding with the next layer. If the material fails to meet the required density, the material shall be reworked, replaced or construction methods altered as necessary to obtain the required density.
 - d. Any areas improperly backfilled, or where settlement occurs, shall be reopened to the depth required for proper compaction, refilled and compacted with the surface restored to the required grade and compaction.
 - e. Low-permeable soil being placed for liner and cap systems shall be done in a consistent manner with the results of the respective test fill pad.
 - f. Protective sand layer must be compacted with hand operated plate vibrator.
- 3.2.9 Backfill placed against or around pavement, piles, sewers, utility structures and similar facilities shall, within six inches of such structures, contain no particles exceeding two inches in largest dimension.
- 3.2.10 Pipe joints shall be left exposed until required tests have been performed and in the case of concrete pipe for at least 24 hours after the joint is made.
- 3.2.11 Construction equipment or other vehicles shall not cross over culverts until the fill has reached a depth of 1/5 the diameter or nine inches, whichever is greater, over the top of the culvert.
- 3.2.12 Heavy equipment shall not be used closer to a foundation than a distance equal to the height of the backfill unless approved in writing by the Owner.
- 3.2.13 No backfill shall be placed against foundations for at least 3 days after pouring concrete.
- 3.2.14 The minimum earth cover above pipe in trenches shall be as follows or as indicated on the contract drawings: