

40-8948



UNITED STATES
NUCLEAR REGULATORY COMMISSION
 WASHINGTON, D.C. 20555-0001

February 19, 1997

Mr. Sherwood Bauman, Chairperson
 Save the Wills Creek
 Water Resources Committee
 6354 Cowgill Lane
 Cumberland, OH 43732

Dear Mr. Bauman:

I am responding to your letter dated January 22, 1997, in which you formally petitioned the U.S. Nuclear Regulatory Commission to take certain actions with respect to the development of the environmental impact statement (EIS) for the Shieldalloy Metallurgical Corporation (SMC) facility in Cambridge, Ohio, and to initiate several rulemakings. The purpose of this letter is to describe how NRC will address each of your requests.

You requested that:

- 1) Pursuant to 10 CFR 2.206, NRC broaden the scope of the EIS to include, investigate, score, and evaluate against all other options, the option of assured storage, as well as other related hybrid options identified in your letter.
- 2) NRC initiate a rulemaking to preclude Shieldalloy, Cyprus Foote, and any others from entering in covenants not to sue with any other State or Federal agencies which could interfere with NRC's authority to enforce Federal laws or regulations in Chapter 10 of the Code of Federal Regulations (CFR).
- 3) NRC initiate a rulemaking which would require that above-ground assured storage be considered and scored as a viable option to be considered at all NRC licensed sites which seek on site or in situ disposal.
- 4) NRC initiate a rulemaking that would permit licensees' in situ disposal plans to be approved only when, and if, the responsible parties sign an admission of guilt and wrongdoing so that the stakeholder community has the ability to recoup lost property values and community tax bases.

With respect to your first request, we will consider this alternative and its variations as a late comment on the EIS, rather than process the request as a 2.206 petition. Petition requests under 2.206 are to "modify, suspend, or revoke a license, or for other such action as may be proper," and a request such as yours to broaden the scope of an ongoing EIS is not covered by 10 CFR 2.206.

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 PDR ADOCK 04008948
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280051

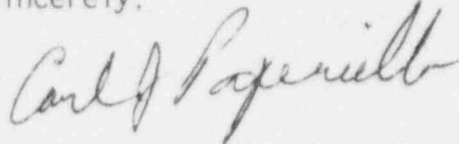
Disks: Available in Central Files

S. Bauman

-2-

Your second, third, and fourth requests will be considered as petitions for rulemaking pursuant to 10 CFR 2.802. You will be kept informed of NRC actions with respect to these rulemaking petitions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Carl J. Paperiello". The signature is fluid and cursive, with the first name "Carl" and last name "Paperiello" clearly distinguishable.

Carl J. Paperiello, Director
Office of Nuclear Material Safety
and Safeguards

Docket: 040-08948
License No.: SMB-1507

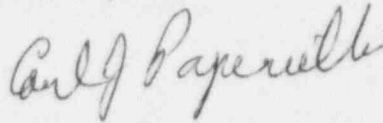
cc: Cambridge Distribution List

S. Bauman

-3-

Your second, third, and fourth requests will be considered as petitions for rulemaking pursuant to 10 CFR 2.802. You will be kept informed of NRC actions with respect to these rulemaking petitions.

Sincerely,



Carl J. Paperiello, Director
Office of Nuclear Material Safety
and Safeguards

Docket: 040-08948
License No.: SMB-1507

cc: Cambridge Distribution List

TICKET: NMSS 9700033 (related to G9700058)

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CP/PROOFED/FEBRUARY 18, 1997

*See previous concurrence

OFC	LLDP		LLDP		LLDP	E	OGC	E	IMNS		DWM	
NAME	JKennedy*		RNelson*		JHickey*		RFonner*		GDeegan*		JGreeves*	
DATE	2/10/97		2/12/97		2/12/97		2/10/97		2/10/97		2/17/97	
OFC	NMSS		NMSS									
NAME	MKrapp		CPaperiello									
DATE	2/19/97		2/19/97									

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IG : YES ☐ NO ☐
LSS : YES ☐ NO ☐ Delete file after distribution: Yes ☐ No ☐

S. Bauman

-3-

Your second, third, and fourth requests will be considered as petitions for rulemaking pursuant to 10 CFR 2.802. You will be kept informed of NRC actions with respect to these rulemaking petitions.

Sincerely,

Carl J. Paperiello, Director
Office of Nuclear Material Safety
and Safeguards

Docket: 040-08948
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cc: Cambridge Distribution List

TICKET: NMSS 9700033 (related to G9700058)

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*See previous concurrence

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NAME	JKennedy*		RNelson		JHickey			RFonner*			GDeegan				
DATE	2/10/97		2/10/97		2/12/97			2/10/97			2/10/97			2/17/97	

OFC	NMSS	<input type="checkbox"/>	NMSS	<input type="checkbox"/>											
NAME	MKnapp		CPaperiello												
DATE	2/ /97		2/ /97												

OFFICIAL RECORD COPY

ACNW: YES ☐ NO ☐
IG : YES ☐ NO ☐
LSS : YES ☐ NO ☐

Category: Proprietary ☐ or CF Only ☐

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1) with respect to your second request, a fundamental legal principle is that persons not parties to an agreement or a covenant are not bound by it. NRC is not a party to any consent order between the State of Ohio, Cyprus Foote, and Shieldalloy, and therefore NRC's authority is not affected by any such consent order; 2) with respect to the fourth request, in a Commission decision issued on June 18, 1996, related to the Yankee Atomic Power Station decommissioning plan and claims for damages filed by Petitioners (43 NRC 235), the Commission stated:

"Although the Commission has a general responsibility to ensure that decommissioning operations do not jeopardize public health and safety, no statute or regulation grants the Commission authority to require the licensee to pay (in effect) compensatory damages to private individuals."

You will be kept informed of NRC actions with respect to your petitions for rulemaking.

Sincerely,

Carl J. Paperiello, Director
Office of Nuclear Material Safety
and Safeguards

Docket: 040-08948
License No.: SMB-1507

Cambridge Distribution
List

TICKET: NMSS 9700033

DISTRIBUTION:

Central File	NMSS r/f	LLDP r/f	JGreeves	MFederline
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OFC	LLDP	LLDP	LLDP	OGC	C	DWM	NMSS	NMSS
NAME	JKennedy	RNelson	JHickey	RFonner			MKnapp	CPaperiello
DATE	2/10/97	2/10/97	1/1	2/11/97	1/1	1/1	1/1	1/1

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PUBLIC: YES ☐ NO ☐
ACNW: YES ☐ NO ☐
IG: YES ☐ NO ☐

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Reissued

Kennedy

TICKET

DATE RECEIVED: 01/29/97 ORIGINAL DUE DT: 02/25/97 CONTROL NO: 9700033
FROM: DIVISION DATE: 02/20/97 DOC DT: 01/22/97
TIME: : COMP DT: / /

Sherwood (Forest) Bauman
Save Wills Creek

TO:

NRC

FOR SIGNATURE OF :

** GRN **

SECY NO:

ASSIGNED TO: DWM CONTACT:

DESC:

ROUTING:

PETITION FOR ACTION AND RULE MAKING AS ALLOWED
UNDER 2.206 OF THE 10 CFR CODES TO BROADEN THE
SCOPE OF THE DEIS FOR THE SHIELDALLOY FACILITY

Paperiello
Knapp
Linehan
Deegan
Poland

SPECIAL INSTRUCTIONS OR REMARKS:

DWM - The DWM contact on this 2.206 should contact
George Deegan asap to set up a Petition Review
Board meeting to be held within one week of the
receipt of this 2.206. George Deegan will notify
Cathy of process in which this ticket will proceed.
The due dates for this ticket as assigned are:
Due to NMSS - 2/20/97; due to EDO - 2/25/97. When
this ticket is closed, the EDO will become active
w/the appropriate due dates (G9700058).

Please use TAC No. L50100 253A for all time spent
on this 2.206.

ACTION: Hickey
Due to DWM
Director's Office: 2/14/97

cc: Greaves
Federline
Sobel

1/30

ACTION

EDO Principal Correspondence Control

FROM:

DUE: 02/25/97

EDO CONTROL: G970058

DOC DT: 01/22/97

FINAL REPLY:

Sherwood (forest) Bauman
Save Wills Creek

TO:

NRC

FOR SIGNATURE OF :

** GRN **

CRC NO: 97-0093

Paperiello

DESC:

ROUTING:

PETITION FOR ACTION AND RULE MAKING AS ALLOWED
UNDER 2.206 OF THE 10 CFR CODES TO BROADEN THE
SCOPE OF THE DEIS FOR THE SHIELDALLOY FACILITY

Thompson
Jordan
Norris
Blaha
Cyr, OGC
Goldberg, OGC
Kennedy, NRR

DATE: 01/28/97

ASSIGNED TO:

CONTACT:

NMSS

Paperiello

SPECIAL INSTRUCTIONS OR REMARKS:

NMSS TAC # for this
2.206
is
L 50100
253A



DWM Action
Due to NMSS Director's Office
By 2/20/97

Paperiello
Knapp
Lenehan
PAB
Bland

OFFICE OF THE SECRETARY
CORRESPONDENCE CONTROL TICKET

PAPER NUMBER: CRC-97-0093 LOGGING DATE: Jan 27 97

ACTION OFFICE: EDO

AUTHOR: SHERWOOD BAUMAN
AFFILIATION: OHIO

ADDRESSEE: HUGH THOMPSON

LETTER DATE: Jan ²⁹~~27~~ 97 FILE CODE:

SUBJECT: PETITION FOR ACTION AND RULE MAKING AS ALLOWED UNDER
2.206 OF THE 10 CFR CODES TO BROADEN THE SCOPE OF
THE DEIS FOR THE SHIELDALLOY FACILITY

ACTION: Appropriate

DISTRIBUTION: CHAIRMAN

SPECIAL HANDLING: 2.206 PETITION

CONSTITUENT:

NOTES: OCM #6966

DATE DUE:

SIGNATURE: DATE SIGNED:
AFFILIATION:

6966

Save Wills Creek Subsidiary of EarthlinkTM

Sherwood Forest Bauman
Director
6254 Cowgill Lane
Cambridge, Ohio 43732

Telephone 1 (614) 338-2509

To: Hugh L. Thompson, Jr.
Nuclear Regulatory Commission
Jim Kennedy, Chip Cameron, Shirley Jackson
Robert Nelson, Mike Weber
11555 Rockville Pike
Rockville, Maryland 20855

Reas: Formal petition for action and rule making as allowed under section 2.206 of the 10 CFR codes to broaden the scope of the DEIS for the Sheldalloy facility in Cambridge, Ohio (hereinafter referred to simply as site) to include as yet uninvestigated and very workable options which could present the best alternative for our community at a price within affordable reality.

Dear Hugh Thompson and other staff:

As is my right under the auspices of the 10 CFR rules and regulations (oft quoted but rarely followed by the NRC) sub section 2.206, as well as any and all other sections of said Code of Regulations or other federal laws dealing with rule making or the broadening of the scope of an DEIS which may be applicable since the NRC has not seen fit to provide us with a full and up to date set of said regulations, we herein as is more fully spelled out below request that the scope of the current DEIS for the site be broadened to include the option and its various hybrids as are more fully spelled out in options one through nine of said request. The broadening of the DEIS would be the inclusion of Above Ground Assured Storage Technology in all of its various formats and possibility as we have spelled out in our request to broaden said DEIS. Additionally, said petition for Administrative Action is to be further intended as a petition for rule making that would require the scoring of Above Ground Assured Storage Technology implementation against all other options at any and all sites being considered for insitu disposal and deed restricted access verse NRC's normal safeguards of ALARA and 15 M/REM a year for unrestricted use and release of the property. Further, said petition for administrative action and rule making would also petition the NRC as is more fully outlined below to implement rules which would preclude states or NRC licensees (agreement or otherwise) from granting NRC licensee's or former licensee's Covenants Not to Sue (or other instruments that bring about the same effects), and that further we petition the NRC for rule making which would see that any licensee insitu disposal plans approved be approved only when and if the responsible parties (all responsible parties) sign an admission of guilt and wrong doing so that the stakeholder community has the ability to recoup lost property values and community tax bases sacrificed by such flawed decommissioning strategies.

BASIS FOR REQUEST

Sherwood Bauman, as well as the organizations he represents and any and all additional co-signatories do herein state that our petition for administrative action and petition for rule making should be granted for the following reasons.

1. Whereas Sheldalloy in 1987 did in fact and deed take possession of 600,000 tons of LLRW after the previous owner Cyprus Foote did have its license retired under false pretenses, (Said previous licensee stated that it was their belief that there were no longer materials of licensable control at the facility)
2. Whereas the state of Ohio and the NRC did approve a decommissioning plan which failed and was halted in 1989.
3. Whereas the staff of the NRC did in fact and deed dismally fail the community of Guernsey County Ohio by failing to police the license at the site for a period of some 12 years.
4. Whereas the company Sheldalloy company (licensee) did in 1993 seek protection from creditors by running into the Federal Bankruptcy courts while at the same time submitting a closure plan for the facility.
5. Whereas the NRC determined that closure of the facility constituted a major federal action which would implement the need for and EIS as called for in NEPA to evaluate "ALL" risks (both environmentally, an social economic (which would include health risks and financial costs to affected host community)) to our community as well as the preferred plan of the licensee and any and all other viable means of remediation at the site.
6. Whereas the NRC has a duty to the stakeholders of a community to include any and all viable options within and EIS.

7. Whereas the DEIS is incomplete and fails to include a cost affordable option that the NRC has known about for some time, and in fact not only knows about, but is actually considering the merits of said technology.

8. Whereas the licensee and former licensees are attempting to mitigate their legal responsibilities through potentially subversive fashions that would undermine the federal rules and regulations as relates to financial capability, human health and safety.

9. Whereas the licensee's (both current and former) seek to enter into legal contracts that would mitigate and interfere with the NRC's ability to enforce federal law, (state of Ohio plans on entering into a covenant not to sue with said licensees, state of Ohio is anticipated to become an agreement state with the NRC, said covenant could present a conflict of interest and interfere with Ohio's ability to enforce the NRC rules and regulations.)

Sherwood Bauman as a more fully defined in following sections respectfully moves the NRC to grant his petitions for action and petition for rule making.

OUTLINE AND SPECIFICS OF FORMAL PETITION

Said formal petition for action, and formal request for rule making falls into three specific sub categories identified as A, B, and C. Further, said requester(s) wish to have the petition in full released for public comment and review verse a potentially inaccurate synopsis of our request created by the NRC. Should any singular portion of the petition for action or the petition for rule making be deemed improperly filed or executed, all other portions shall stand individually upon their own merits as if submitted separately and apart from the part(s) deemed improperly filed or executed.

A) FORMAL REQUEST FOR RULE MAKING TO PRECLUDE SHIELDALLOY, CYPRUS FOOTE AND ANY AND ALL OTHER LICENSEE'S FROM ENTERING INTO COVENANTS NOT TO SUE WITH ANY AND ALL OTHER STATE OR FEDERAL AGENCIES WHICH COULD INTERFERE WITH THE NRC'S RIGHTS AND ABILITIES TO ENFORCE FEDERAL LAWS AND OR THE REGULATIONS AS DEFINED IN 10 CFR.

It has come to the attention of Sherwood Bauman, Save Wills Creek, Earthlink as well as any and all other cosignatories of this document, that the state of Ohio intends, as a part of its settlement of disputes with the licensee (Shieldalloy) and the former licensee (Cyprus Foote), to enter into an agreement which is titled Permanent Injunction/Consent Order in the case of state of Ohio, et al. (plaintiff) verse Shieldalloy Metallurgical Corporation and Cyprus Foote Mineral Company defendants (Case # 95 CV 242) filed in the Guernsey County Court of Common Pleas. Said agreement includes as a part therein a Covenant not to Sue which would in fact and deed interfere with the Federal Government and the NRC's ability to enforce rules and regulations as relates to the long term storage and/or disposal of LLRW in light of the state of Ohio's current plans to become an agreement state with the NRC as would be required for said state to build and host a compact facility. We would question the conflict of interest established when a state who has previously signed a covenant not to sue becomes an agreement state, and therefore feel that various cooperating agencies involved in a DEIS should not be allowed to enter into such covenants as a general rule and thus feel a rule making is needed to clarify this situation.

Said petitioner therefore respectfully requests and petitions the NRC for a new federal regulatory code within 10 CFR which would preclude and forbid licensee's or cooperating agencies from signing such agreements as Covenants not to Sue, and further requests that said rule making if implemented be inclusive of and enforced in regards to the proposed remediation of and the retirement of the license for the Shieldalloy site situated on State Route 209 in Guernsey County, state of Ohio.

Petitioner further requests that a determination be made as to the legality of the state of Ohio entering into such agreements without the involvement and approval of the NRC as the wastes in question at said site fall within the jurisdictional control of not the state of Ohio, but instead that of the NRC. Additionally, we question the legality of said covenant as relates to the rules and regulations of the US EPA on the state of Ohio's status as an agreement state with said Federal Agency.

B) FORMAL REQUEST AND PETITION FOR RULE MAKING WHICH WOULD CREATE A REGULATORY REQUIREMENT TO SCORE ABOVE GROUND ASSURED STORAGE AS A VIABLE WORKABLE OPTION AGAINST ANY AND ALL ALTERNATIVE OPTIONS AT ALL NRC SITES WHICH SUBMIT PLANS FOR INSITU DISPOSAL OF LLRW AT SITES WHICH ARE LOCATED IN OR NEAR WETLANDS OR LOCATED WITHIN SITUATE 100 YEAR FLOOD PLAIN AREAS WITHIN THE UNITED STATES OF AMERICA AND ITS BORDERS.

It has come to the attention of Sherwood Bauman, Save Wills Creek, Earthlink as well as any and all other cosignatories of this document, that there is a technology known to the NRC and within the LLRW community known as Above Ground Assured Storage technology. Further, said technology over the long term has shown the ability to offer more protections to affected stakeholder communities while at the same time being very cost competitive when compared to other disposal methods and alternatives such as disposal at licensed long term care facilities and/or insitu disposal (with many inherent health risks and unknown potential short comings.) options that are normally evaluated within the confines of a DEIS when contemplating the means by which a facility shall be remediated and a facility closed. Since the NRC seems unwilling to have waste's

shipped to licensed facilities built for receiving and safe storage of such wastes, we feel it is imperative that other options besides flawed instu (offensive but dangerous to human health and destructive to environment and natural resources) be given full and complete consideration during the DEIS process.

For the above reasons, we move and petition the NRC to form site rules and regulations which would require Assured Storage be considered as a viable and scoreable option to be considered at "all" LRL sites which seek instu waste disposal, as well as any and all sites anywhere, in the implementation of DEIS under the policies and procedures which govern NEPA and the "responsibility" of NRC for purposes of determining a site and retirement of a license.

It is further moved and petitioned that the Shieldalloy site in Cambridge, Ohio be included and held to the standards which would be created in such rule making for the following reasons.

1. Currently, though the DEIS is under review, no final plan has been approved, nor signed off on by the Commission nor its staff.
2. Currently, it is expected that the staff of the NRC will have to either A) republish the DEIS or at a minimum B) issue a supplement to said document.

In light of this, no decision is expected on this site in the very near future. Resulting, it would be in the best interest of our community (Guernsey County, State of Ohio) to have said Assured Storage scored for our facility and the dangerous wastes located at said site. Human health and preservation of natural resources should take precedent over company convenience.

C) SHERWOOD BAUMAN, SAVE WILLS CREEK, EARTHINK AS WELL AS ANY AND ALL SIGNATORIES TO THIS DOCUMENT HEREIN OFFICIALLY PETITION THE NRC FOR AN ADMINISTRATIVE ACTION WHICH WOULD REQUIRE THE LICENSEE SHIELDALLOY AND THE STAFF OF THE NRC TO BROADEN THE SCOPE OF THE DEIS ON THE SHIELDALLOY SITE SITUATED ON STATE ROUTE 209, CAMBRIDGE, COUNTY OF GUERNSEY, STATE OF OHIO TO INCLUDE, INVESTIGATE, SCORE AND EVALUATE AGAINST ALL OTHER OPTIONS THE OPTION HEREIN AFTER REFERRED TO AS ASSURED STORAGE AS WELL AS THE OTHER HYBRID ALTERNATIVES INCLUDED HEREIN AND ENTITLED OPTIONS 1-9 OF THE EXPANDED DEIS REQUEST.

Sherwood Bauman has just come into possession of documents which have led him and the various assured signatories to this petition to believe that there is another alternative that the NRC has full and complete knowledge of, and that said agency and their licensee deliberately hid and kept from public view so as to allow for the flawed preferred disposal alternative of instu disposal to reap the highest score in the evaluation process and thus be chosen as the NRC's endorsed plan for the site.

In fact, it is further believed that the NRC did not include said option as a part and parcel of said DEIS to further their agency's internal long range goal of creating a formula which would allow instu disposal at all SDMP sites across the United States of America using our site and the National Case Setting Precedent for this dubious remediation method as the talisman to march under as they visited flawed cover ups on communities across this land. For these and the reasons stated above, the petitioner(s) herein respectfully move for an administrative action which would broaden the scope of the DEIS to include the Assured Storage options which are more fully defined and identified in options 1-9 below.

Option One-Above Ground Assured Storage of materials in a building outside of the wetland areas, said building to be constructed on the property now owned by the licensee, with all materials both of a radiological, hazardous and solid waste nature including all stream sediments and soils on and off of the site as well as contaminated materials which may have left the facility. This option would further require that all areas of wetlands from which soils, slags or other materials would be removed, would be restored to their pre-use conditions, (pre-use to be construed as meaning before said wastes were illegally, wrongfully or otherwise dumped and/or stored).

Option two-is a hybrid of number one above, which would see the radioactive slag herein known as the east slag pile disposed of at a licensed disposal facility. (Which according to the licensee would be the Envirocare facility in Utah). All other aspects of option number one would be the same.

Option three-again, a hybrid of number one above, with the East Slag pile waste being treated as in number two above, and the contaminated (hazardous wastes) soil and stream sediments being shipped off site to a licensed hazardous waste disposal facility.

Option four-again a hybrid of number one above, with the off site wastes being deemed a separate issue not to be dealt with by Shieldalloy, as said off site radioactive slag is actually the responsibility of another party in the form of Cyprus Foote Mineral.

Option five-Above Ground Assured Storage of all wastes according to assured storage technology as in number one above, but with the assured storage buildings being constructed some place other than

on the property of the licensee speak to remove the materials not just out of the wetlands, but to provide the additional and necessary protection of removing the materials from our counties 100 year flood plain area.

Option five-again, a hybrid of five above with the East Slag pile waste to be removed and sent to a licensed disposal facility instead of being included in the above storage facility.

Option seven-again, a hybrid of five above, except that the East Slag pile and the hazardous wastes on the top of contaminated soils and stream sediments to be shipped to a licensed disposal facility.

Option eight-again, a hybrid of five above, but with the East Slag pile and the hazardous wastes on the top of contaminated soils and stream sediments would be shipped to a licensed disposal facility, while at the same time making the decision that the off site wastes should not be included in the on site remediation process for this site.

Option nine-same as five above, but time making the decision that the off site wastes should not be included in the on site remediation process for this site.

Above Ground Assured Storage as referred to in this petition for administrative action shall be interpreted to mean and above grade (above ground) storage facility (which provides for ease of inspection and repair) which has seen to it that the concrete buildings have protective cover which can easily be repaired or replaced as the need arises. Additionally, since it is possible (as outlined in the companies own option for resale of materials) that future generations may wish to retrieve said materials, said building should be compartmentalized in such as fashion as to segregate the hazardous wastes from the radioactive materials to allow for easy future retrieval of said materials later in the historical time line.

It is believed, that studies of this option and its various hybrids will show that such option provides a much higher degree of public safety, a greater protection of our environment, and over the long term period of 1000 years is highly competitive with the current preferred plan of in situ disposal of said materials. We therefore respectfully petition the NRC to expand the scope of the DEIS to include the nine options as outlined above.

Thus the petitioner closes his request, and prays that the NRC grant all of the above petitions for rule making, as well as the petition for administrative action to broaden the scope of the DEIS.

Respectfully submitted the 22nd day of January in the year of our Lord, 1997.



Sherwood Bonham

COSIGNATORIES

Save Willis Creek
Barthink
Barbara Bonham
Liana Salisbury
Sycamore Valley Group
Jason Vast

ACTION

NELSON/KENNEDY

EDO Principal Correspondence Control

FROM: DUE: 02/25/97 EDO CONTROL: G970058
DOC DT: 01/22/97
FINAL REPLY:

Sherwood (forest) Bauman
Save Wills Creek

TO:

NRC

FOR SIGNATURE OF : ** GRN **

CRC NO: 97-0093

Paperiello

DESC:

ROUTING:

PETITION FOR ACTION AND RULE MAKING AS ALLOWED
UNDER 2.206 OF THE 10 CFR CODES TO BROADEN THE
SCOPE OF THE DEIS FOR THE SHIELDALLOY FACILITY

Thompson
Jordan
Norry
Blaha
Cyr, OGC
Goldberg, OGC
Kennedy, NRR

DATE: 01/28/97

ASSIGNED TO:

CONTACT:

NMSS

Paperiello

SPECIAL INSTRUCTIONS OR REMARKS:

ACTION: Hickey
Due to DWM
Director's Office: 2/14/97

*NMSS TAK # for this
2.206
is*
←

<u>DWM</u> Action
Due to NMSS Director's Office
By <u>2/20/97</u>

*cc: Greene
Federline
Sobel*

*Paperiello
Knapp
Lynch
PAB
Poland*

1/29

OFFICE OF THE SECRETARY
CORRESPONDENCE CONTROL TICKET

PAPER NUMBER: CRC-97-0093 LOGGING DATE: Jan 27 97

ACTION OFFICE: EDO

AUTHOR: SHERWOOD BAUMAN
AFFILIATION: OHIO

ADDRESSEE: HUGH THOMPSON

LETTER DATE: Jan ²⁹~~27~~ 97 FILE CODE:

SUBJECT: PETITION FOR ACTION AND RULE MAKING AS ALLOWED UNDER
2.206 OF THE 10 CFR CODES TO BROADEN THE SCOPE OF
THE DEIS FOR THE SHIELDALLOY FACILITY

ACTION: Appropriate

DISTRIBUTION: CHAIRMAN

SPECIAL HANDLING: 2.206 PETITION

CONSTITUENT:

NOTES: OCM #6966

DATE DUE:

SIGNATURE: . DATE SIGNED:
AFFILIATION:

6966

Save Wills Creek Subsidiary of EarthlinkTM

Sherwood (Forest) Bauman
Director
6354 Cowgill Lane
Cumberland, Ohio 43732

Telephone 1 (614) 638-2529

To: Hugh L. Thompson, Jr.
Nuclear Regulatory Commission
Jim Kennedy, Chip Cameron, Shirley Jackson
Robert Nelson, Mike Weber
11555 Rockville Pike
Rockville, Maryland 20855

Reas: Formal petition for action and rule making as allowed under section 2.206 of the 10 CFR codes to broaden the scope of the DEIS for the Shieldalloy facility in Cambridge, Ohio (hereinafter referred to simply as site) to include as yet uninvestigated and very workable options which could present the best alternative for our community at a price within affordable reality.

Dear Hugh Thompson and other Staff:

As is my right under the auspices of the 10 CFR rules and regulations (off quoted but rarely followed by the NRC) sub section 2.206, as well as any and all other sections of said Code of Regulations or other federal laws dealing with rule making or the broadening of the scope of an DEIS which may be applicable since the NRC has not seen fit to provide us with a full and up to date set of said regulations, we herein as is more fully spelled out below request that the scope of the current DEIS for the site be broadened to include the option and its various hybrids as are more fully spelled out in options one through nine of said request. The broadening of the DEIS would be the inclusion of Above Ground Assured Storage Technology in all of its various formats and possibility as we have spelled out in our request to broaden said DEIS. Additionally, said petition for Administrative Action is to be further intended as a petition for rule making that would require the scoring of Above Ground Assured Storage Technology implementation against all other options at any and all sites being considered for insitu disposal and deed restricted access verse's NRC's normal safeguards of ALARA and 15 M/REM a year for unrestricted use and release of the property. Further, said petition for administrative action and rule making would also petition the NRC as is more fully outlined below to implement rules which would preclude states or NRC licensee's (agreement or otherwise) from granting NRC licensee's or former licensee's Covenants Not To Sue (or other instruments that bring about the same effects), and that further we petition the NRC for rule making which would see that any licensee insitu disposal plans approved be approved only when and if the responsible parties (all responsible parties) sign an admission of guilt and wrong doing so that the stakeholder community has the ability to recoup lost property values and community tax bases sacrificed by such flawed decommissioning strategies.

BASIS FOR REQUEST

Sherwood Bauman, as well as the organizations he represents and any and all additional co-signatories do herein state that our petition for administrative action and petition for rule making should be granted for the following reasons.

1. Whereas Shieldalloy in 1987 did in fact and deed take possession of 600,000 tons of LLRW after the previous owner Cyprus Foote did have its license retired under false pretenses. (Said previous licensee stated that it was their belief that there were no longer materials of licensable control at the facility)
2. Whereas the state of Ohio and the NRC did approve a decommissioning plan which failed and was halted in 1989.
3. Whereas the staff of the NRC did in fact and deed dismally fail the community of Guernsey County Ohio by failing to police the license at the site for a period of some 12 years.
4. Whereas the company Shieldalloy company (licensee) did in 1993 seek protection from creditors by running into the Federal Bankruptcy courts while at the same time submitting a closure plan for the facility.
5. Whereas the NRC determined that closure of the facility constituted a major federal action which would implement the need for and EIS as called for in NEPA to evaluate "ALL" risks (both environmentally, an social economic (which would include health risks and financial costs to affected host community)) to our community as well as the preferred plan of the licensee and any and all other viable means of remediation at the site.
6. Whereas the NRC has a duty to the stakeholders of a community to include any and all viable options within and EIS.

7. Whereas the DEIS is incomplete and fails to include a cost affordable option that the NRC has known about for some time, and in fact not only knows about, but is actually considering the merits of said technology.

8. Whereas the licensee and former licensee's are attempting to mitigate their legal responsibilities through potentially subversive fashions that would undermine the federal rules and regulations as relates to financial culpability, human health and safety.

9. Whereas the licensee's (both current and former) seek to enter into legal contracts that would mitigate and/or interfere with the NRC's ability to enforce federal law, (State of Ohio plans on entering into a covenant not to sue with said licensees, State of Ohio is also slated to become an agreement state with the NRC. Said covenant could present a conflict of interest and interfere with Ohio's ability to enforce the NRC rules and regulations.)

Sherwood Bauman as is more fully outlined in following sections respectfully moves the NRC to grant his petitions for action and petition for rule making.

OUTLINE AND SPECIFICS OF FORMAL PETITION

Said formal petition for action, and formal request for rule making falls into three specific sub categories identified as A, B, and C. Further, said requester(s) wish to have the petition in full released for public comment and review verse a potentially inaccurate synopsis of our request created by the NRC. Should any singular portion of the petition for action or the petition for rule making be deemed improperly filed or executed, all other portions shall stand individually upon their own merits as if submitted separately and apart from the part(s) deemed improperly filed or executed.

A) FORMAL REQUEST FOR RULE MAKING TO PRECLUDE SHIELDALLOY, CYPRUS FOOTE AND ANY AND ALL OTHER LICENSEES FROM ENTERING INTO COVENANTS NOT TO SUE WITH ANY AND ALL OTHER STATE OR FEDERAL AGENCIES WHICH COULD INTERFERE WITH THE NRC'S RIGHTS AND ABILITIES TO ENFORCE FEDERAL LAWS AND OR THE REGULATIONS AS DEFINED IN 10 CFR.

It has come to the attention of Sherwood Bauman, Save Wills Creek, Earthlink as well as any and all other cosignatories of this document, that the State of Ohio intends, as a part of its settlement of disputes with the licensee (Shieldalloy) and the former licensee (Cyprus Foote), to enter into an agreement which is titled Permanent Injunction/Consent Order in the case of State of Ohio, et al. (plaintiff) verse Shieldalloy Metallurgical Corporation and Cyprus Foote Mineral Company defendants (Case # 95 CV 242) filed in the Guernsey County Court of Common Pleas. Said agreement includes as a part therein a Covenant not to Sue which would in fact and deed interfere with the Federal Government and the NRC's ability to enforce rules and regulations as relates to the long term storage and/or disposal of LLRW in light of the state of Ohio's current plans to become an agreement state with the NRC as would be required for said state to build and host a compact facility. We would question the conflict of interest established when a state who has previously signed a covenant not to sue becomes an agreement state, and therefore feel that various cooperating agencies involved in a DEIS should not be allowed to enter into such covenants as a general rule, and thus feel a rule making is needed to clarify this situation.

Said petitioner therefore respectfully requests and petitions the NRC for a new federal regulatory code within 10 CFR which would preclude and forbid licensee's or cooperating agencies from signing such agreements as Covenants not to Sue, and further requests that said rule making if implemented be inclusive of and enforced in regards to the proposed remediation at and the retirement of the license for the Shieldalloy site situated on State Route 209 in Guernsey County, state of Ohio.

Petitioner further requests that a determination be made as to the legality of the State of Ohio entering into such agreements without the involvement and approval of the NRC as the wastes in question at said site fall within the jurisdictional control of not the state of Ohio, but instead that of the NRC. Additionally, we question the legality of said covenant as relates to the rules and regulations of the US EPA on the state of Ohio's status as an agreement state with said Federal Agency.

B) FORMAL REQUEST AND PETITION FOR RULE MAKING WHICH WOULD CREATE A REGULATORY REQUIREMENT TO SCORE ABOVE GROUND ASSURED STORAGE AS A VIABLE WORKABLE OPTION AGAINST ANY AND ALL ALTERNATIVE OPTIONS AT ALL NRC SITES WHICH SUBMIT PLANS FOR INSITU DISPOSAL OF LLRW AT SITES WHICH ARE LOCATED IN OR NEAR WETLANDS OR LOCATED WITHIN SITUATE 100 YEAR FLOOD PLAIN AREAS WITHIN THE UNITED STATES OF AMERICA AND ITS BORDERS.

It has come to the attention of Sherwood Bauman, Save Wills Creek, Earthlink as well as any and all other cosignatories of this document, that there is a technology known to the NRC and within the LLRW community known as Above Ground Assured Storage Technology. Further, said technology over the long term has shown the ability to offer more protections to affected stakeholder communities while at the same time being very cost competitive when compared to other disposal methods and alternatives such as disposal at licensed long term care facilities and/or insitu disposal (with many inherent health risks and unknown potential short comings.) options that are normally evaluated within the confines of a DEIS when contemplating the means by which a facility shall be remediated and a facility closed. Since the NRC seems unwillingly to have waste's

shipped to licensed facilities built for receiving and safe storage of such waste's, we feel it is imperative that other options besides flawed insitu (affordable but dangerous to human health and destructive to environment and natural resources) be given full and complete consideration during the NEPA process.

For the above reasons, we move and petition the NRC to formulate rules and regulations which would require Assured Storage be considered as a viable and scoreable option to be considered at *all* NRC sites which seek on site or insitu disposal, as well as any and all sites which require the implementation of an EIS under the policies out lined which govern NEPA and the deployment of same for purposes of decommissioning a site and retirement of a license.

It is further moved and petitioned that the Shieldalloy site in Cambridge Ohio be included and held to the standards which would be created in such rule making for the following reasons.

1. Currently, though the DEIS is under review, no final plan has been approved, nor signed off on by the commission nor its staff.
2. Currently, it is expected that the staff of the NRC will have to either A) re-publish the DEIS or at a minimum B) issue a supplement to said document.

In light of this, no decision is expected on this site in the very near future. Resultingly, it would be in the best interest of our community (Guernsey County, state of Ohio) to have said Assured Storage scored for our facility and the dangerous wastes located at said site. Human health and preservation of natural resources should take precedent over company convenience.

C) SHERWOOD BAUMAN, SAVE WILLS CREEK, EARTHLINK AS WELL AS ANY AND ALL SIGNATORIES TO THIS DOCUMENT HERIN OFFICIALLY PETITION THE NRC FOR AN ADMINISTRATIVE ACTION WHICH WOULD REQUIRE THE LICENSEE SHIELDALLOY AND THE STAFF OF THE NRC TO BROADEN THE SCOPE OF THE DEIS ON THE SHIELDALLOY SITE SITUATED ON STATE ROUTE 209, CAMBRIDGE, COUNTY OF GUERNSEY, STATE OF OHIO TO INCLUDE, INVESTIGATE, SCORE AND EVALUATE AGAINST ALL OTHER OPTIONS THE OPTION HEREIN AFTER REFERRED TO AS ASSURED STORAGE AS WELL AS THE OTHER HYBRID ALTERNATIVES INCLUDED HEREIN AND ENTITLED OPTIONS 1-9 OF THE EXPANDED DEIS REQUEST.

Sherwood Bauman has just come into possession of documents which have led him and the various assorted signatories to this petition to believe that there is another alternative that the NRC has full and complete knowledge of, and that said agency and their licensee deliberately hid and kept from public view so as to allow for the flawed preferred disposal alternative of insitu disposal to reap the highest score in the evaluation process and thus be chosen as the NRC's endorsed plan for the site.

In fact, it is further believed that the NRC did not include said option as a part and parcel of said DEIS to further their agency's internal, long range goal of creating a formula which would allow insitu disposal at all SDMP sites across the United States of America using our site and the National Case Setting Precedent for this dubious remediation method as the talisman to march under as they visited flawed cover ups on communities across this land. For these and the reasons stated above, the petitioner(s) herein respectfully move for an administrative action which would broaden the scope of the DEIS to include the Assured Storage options which are more fully defined and identified in options 1-9 below.

Option One-Above Ground Assured Storage of materials in a building outside of the wetland areas, said building to be constructed on the property now owned by the licensee, with all materials both of a radiological, hazardous and solid waste nature including all stream sediments and soils on and off of the site as well as contaminated materials which may have left the facility. This option would further require that all areas of wetlands from which soils, slags or other materials would be removed, would be restored to their preuse conditions. (pre-use to be construed as meaning before said wastes were illegally, wrongfully or otherwise dumped and/or stored)

Option two-is a hybrid of number one above, which would see the radioactive slag herein known as the east slag pile disposed of at a licensed disposal facility. (Which according to the licensee would be the Envirocare facility in Utah.) All other aspects of option number one would be the same.

Option three-again, a hybrid of number one above, with the East Slag pile waste being treated as in number two above, and the contaminated (hazardous wastes) soil and stream sediments being shipped off site to a licensed hazardous waste disposal facility.

Option four-again a hybrid of number one above, with the off site wastes being deemed a separate issue not to be dealt with by Shieldalloy, as said off site radioactive slag is actually the responsibility of another party in the form of Cyprus Foote Mineral.

Option five-Above Ground Assured Storage of all waste's according to assured storage technology as in number one option above, but with the assured storage buildings being constructed some place other than

in the property of the licensee so as to remove the materials not just out of the wetlands, but to provide the additional and necessary protection of removing the materials from our counties 100 year flood plain area.

Option six-again, a hybrid of five above with the East Slag Pile waste to be removed and sent to a licensed disposal facility instead of being included in the assured storage facility.

Option seven-again, a hybrid of five above, except that the East Slag pile and the hazardous wastes (in the form of contaminated soils and stream sediments) would be shipped to a licensed disposal facility.

Option eight-again, a hybrid of five above, but with the East Slag pile and the hazardous wastes (in the form of contaminated soils and stream sediments) would be shipped to a licensed disposal facility, while at the same time making the decision that the off site wastes should not be included in the on site remediation process for this site.

Option nine-same as five above, but time making the decision that the off site wastes should not be included in the on site remediation process for this site.

Above Ground Assured Storage as referred to in this petition for administrative action shall be interpreted to mean and above grade (above ground) storage facility (which provides for ease of inspection and repair) which has seen to it that the concrete buildings have protective cover which can easily be repaired or recoated as the need arises. Additionally, since it is possible (as outlined in the companies own option for resale of materials) that future generations may wish to retrieve said materials, said building should be compartmentalized in such as fashion as to segregate the hazardous wastes from the radioactive materials to allow for easy future retrieval of said materials later in the historical time line.

It is believed, that studies of this option and its various hybrids will show that such option provides a much higher degree of public safety, a greater protection of our environment, and over the long term period of 1,000 years is highly competitive with the current preferred plan of insitu disposal of said materials. We therefore respectfully petition the NRC to expand the scope of the DEIS to include the nine options as outlined above.

Thus the petitioner closes his request, and prays that the NRC grant all of the above petitions for rule making, as well as the petition for administrative action to broaden the scope of the DEIS.

Respectfully Submitted the 22nd day of January in the year of our Lord, 1997.



Sherwood Bauman

COSIGNATORIES

Save Wills Creek
Earthlink
Barbara Bonham
Diana Salisbury
Sycamore Valley Group
Jason Saat

ACTION

EDO Principal Correspondence Control

FROM:

DUE: 02/25/97

EDO CONTROL: G970058

DOC DT: 01/22/97

FINAL REPLY:

Sherwood (forest) Bauman
Save Wills Creek

TO:

NRC

FOR SIGNATURE OF :

** GRN **

CRC NO: 97-0093

Paperiello

DESC:

PETITION FOR ACTION AND RULE MAKING AS ALLOWED
UNDER 2.206 OF THE 10 CFR CODES TO BROADEN THE
SCOPE OF THE DEIS FOR THE SHIELDALLOY FACILITY

ROUTING:

Thompson
Jordan
Norry
Blaha
Cyr, OGC
Goldberg, OGC
Kennedy, NRR

DATE: 01/28/97

ASSIGNED TO:

CONTACT:

NMSS

Paperiello

SPECIAL INSTRUCTIONS OR REMARKS:

ACTION: Hickey
Due to DWM
Director's Office: 2/14/97

NMSS TAC # for this
2.206
is
L5D100
253A

DWM Action
Due to NMSS Director's Office
By 2/20/97

cc: Greaves
Federline
Sobel

Paperiello
Knapp
Lynch
PAB

1/29

OFFICE OF THE SECRETARY
CORRESPONDENCE CONTROL TICKET

PAPER NUMBER: CRC-97-0093 LOGGING DATE: Jan 27 97

ACTION OFFICE: EDO

AUTHOR: SHERWOOD BAUMAN
AFFILIATION: OHIO

ADDRESSEE: HUGH THOMPSON

LETTER DATE: Jan ²⁹~~27~~ 97 FILE CODE:

SUBJECT: PETITION FOR ACTION AND RULE MAKING AS ALLOWED UNDER
2.206 OF THE 10 CFR CODES TO BROADEN THE SCOPE OF
THE DEIS FOR THE SHIELDALLOY FACILITY

ACTION: Appropriate

DISTRIBUTION: CHAIRMAN

SPECIAL HANDLING: 2.206 PETITION

CONSTITUENT:

NOTES: OCM #6966

DATE DUE:

SIGNATURE: . DATE SIGNED:
AFFILIATION:

6966

Save Wills Creek Subsidiary of EarthlinkTM

Sherwood (Forest) Bauman
Director
6354 Cowgill Lane
Cumberland, Ohio 43732

Telephone (614) 638-2829

Rev. Hugh L. Thompson, Jr.
Nuclear Regulatory Commission
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Reas: Formal petition for action and rule making as allowed under section 2.206 of the 10 CFR codes to broaden the scope of the DEIS for the Shieldalloy facility in Cambridge, Ohio (hereinafter referred to simply as site) to include as yet uninvestigated and very workable options which could present the best alternative for our community at a price within affordable reality.

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1. Whereas Shieldalloy in 1987 did in fact and deed take possession of 600,000 tons of LLRW after the previous owner Cyprus Foote did have its license retired under false pretenses. (Said previous licensee stated that it was their belief that there were no longer materials of licensable control at the facility)
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Said petitioner therefore respectfully requests and petitions the NRC for a new federal regulatory code within 10 CFR which would preclude and forbid licensee's or cooperating agencies from signing such agreements as Covenants not to Sue, and further requests that said rule making if implemented be inclusive of and enforced in regards to the proposed remediation at and the retirement of the license for the Shieldalloy site situated on State Route 209 in Guernsey County, state of Ohio.

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Option eight again a hybrid of five above, but with the East slag pile and the hazardous wastes in the form of contaminated soils and stream sediments would be shipped to a licensed disposal facility, while at the same time making the decision that the off site wastes should not be included in the on site remediation process for this site.

Option nine same as five above, but time making the decision that the off site wastes should not be included in the on site remediation process for this site.

Above Ground Assured Storage as referred to in this petition for administrative action shall be interpreted to mean and above grade (above ground) storage facility (which provides for ease of inspection and repair) which has seen to it that the concrete buildings have protective cover which can easily be repaired or replaced as the need arises. Additionally, since it is possible (as outlined in the companies own option for resale of materials) that future generations may wish to retrieve said materials, said building should be compartmentalized in such as fashion as to segregate the hazardous wastes from the radioactive materials to allow for easy future retrieval of said materials later in the historical time line.

It is believed, that studies of this option and its various hybrids will show that such option provides a much higher degree of public safety, a greater protection of our environment, and over the long term period of 1000 years is highly competitive with the current preferred plan of instir disposal of said materials. We therefore respectively petition the NRC to expand the scope of the DEIS to include the nine options as outlined above.

Thus the petitioner closes his request, and prays that the NRC grant all of the above petitions for rule making, as well as the petition for administrative action to broaden the scope of the DEIS.

Respectfully submitted this 22nd day of January in the year of our Lord, 1997,



Sherwood Bauman

COSIGNATORIES

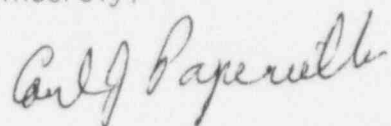
Save Wills Creek
Earthlink
Barbara Bonham
Liana Salisbury
Sydamore Valley Group
Jason Saat

S. Bauman

-3-

Your second, third, and fourth requests will be considered as petitions for rulemaking pursuant to 10 CFR 2.802. You will be kept informed of NRC actions with respect to these rulemaking petitions.

Sincerely,



Carl J. Paperiello, Director
Office of Nuclear Material Safety
and Safeguards

Docket: 040-08948
License No.: SMB-1507

cc: Cambridge Distribution List

TICKET: NMSS 9700033 (related to G9700058)

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

February 19, 1997

Mr. Sherwood Bauman, Chairperson
Save the Wills Creek
Water Resources Committee
6354 Cowgill Lane
Cumberland, OH 43732

Dear Mr. Bauman:

I am responding to your letter dated January 22, 1997, in which you formally petitioned the U.S. Nuclear Regulatory Commission to take certain actions with respect to the development of the environmental impact statement (EIS) for the Shieldalloy Metallurgical Corporation (SMC) facility in Cambridge, Ohio, and to initiate several rulemakings. The purpose of this letter is to describe how NRC will address each of your requests.

You requested that:

- 1) Pursuant to 10 CFR 2.206, NRC broaden the scope of the EIS to include, investigate, score, and evaluate against all other options, the option of assured storage, as well as other related hybrid options identified in your letter.
- 2) NRC initiate a rulemaking to preclude Shieldalloy, Cyprus Foote, and any others from entering in covenants not to sue with any other State or Federal agencies which could interfere with NRC's authority to enforce Federal laws or regulations in Chapter 10 of the Code of Federal Regulations (CFR).
- 3) NRC initiate a rulemaking which would require that above-ground assured storage be considered and scored as a viable option to be considered at all NRC licensed sites which seek on site or in situ disposal.
- 4) NRC initiate a rulemaking that would permit licensees' in situ disposal plans to be approved only when, and if, the responsible parties sign an admission of guilt and wrongdoing so that the stakeholder community has the ability to recoup lost property values and community tax bases.

With respect to your first request, we will consider this alternative and its variations as a late comment on the EIS, rather than process the request as a 2.206 petition. Petition requests under 2.206 are to "modify, suspend, or revoke a license, or for other such action as may be proper," and a request such as yours to broaden the scope of an ongoing EIS is not covered by 10 CFR 2.206.

S. Bauman

-3-

Your second, third, and fourth requests will be considered as petitions for rulemaking pursuant to 10 CFR 2.802. You will be kept informed of NRC actions with respect to these rulemaking petitions.

Sincerely,

Carl J. Paperiello

Carl J. Paperiello, Director
Office of Nuclear Material Safety
and Safeguards

Docket: 040-08948
License No.: SMB-1507

cc: Cambridge Distribution List

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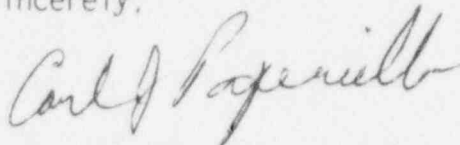
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S. Bauman

-2-

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Sincerely,

A handwritten signature in cursive script, reading "Carl J. Paperiello".

Carl J. Paperiello, Director
Office of Nuclear Material Safety
and Safeguards

Docket: 040-08948
License No.: SMB-1507

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NUCLEAR REGULATORY COMMISSION
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ROUTING AND TRANSMITTAL SLIP

DATE: February 10, 1997

	SIGN AND/OR CONCUR	DATE ^{2/10/97} 10/3/96
1. J. Kennedy	<u> </u>	<u>2/10/97</u>
2. R. Nelson	<u> </u>	<u>2/16/97</u> <i>slr</i>
3. John Hickey	<u> </u>	<u>2/10/97</u>
4. R. Fonner, OGC	<u> </u>	<u>2/10/97</u>
5. DWM	<u> </u>	<u>2/12/97</u>
6. <i>M. Knapp</i> G. Deegan, IMNS	<u> </u>	<u> / / </u>
7. C. Paperiello	<u> </u>	<u> / / </u>
8.	<u> </u>	<u> / / </u>
9.	<u> </u>	<u> / / </u>
10.	<u> </u>	<u> / / </u>

TICKET NUMBER: NMSS 9700033 (related to G9700058)

DUE TO DIVISION: February 14, 1997

DUE TO NMSS: February 20, 1997

DUE TO EDO: n/a

LETTER TO: Sherwood Bauman
FROM: Carl Paperiello
SUBJECT: Section 2.206 Petition
ORIGINATOR: J. Kennedy
SECRETARY: Cecilia Villarreal

ROOM NO./BLDG: T7F40
PHONE NO.: 415-6668