

**Chevron****Chemical**

Environment & Health Protection  
6001 Bollinger Canyon Road  
San Ramon, CA 94583

January 10, 1996

Original Sent Via FAX

Mr. William Snell  
Senior Radiation Specialist  
United States Nuclear Regulatory Commission  
Region III  
801 Warrenville Road  
Lisle, IL 60532-4351

**Radiation Protection Inspection of the Remediation  
of the Former Harshaw Chemical Building, Plant "C"  
in Cleveland, Ohio**

Attention: Mr. William Snell

This response pertains to the special inspection conducted by Mr. House and yourself on October 24 and 25, 1995. During the inspection, it was noted that 10 CFR part 19.13 (E) was not implemented. To comply with the 10 CFR part 19.13 (E), Foster Wheeler Environmental Corporation has to implement the use of NRC Form 5. This form will be provided to employees upon request, prior to leaving the jobsite.

The second issue involved an inconsistency in the Health and Safety Plan (HASP) as to when urinalysis (bioassay) is required. Urinalyses (bioassays) are not required for all employees at the Harshaw Chemical Building, Plant "C". Based on the scope of work, an individual's performance will be the determining factor on whether or not a bioassay is required. The health and Safety Coordinator, along with the Project Health Physicist, will evaluate the incoming personnel to determine if bioassay monitoring is required. In addition, to clarify when bioassay monitoring is needed in the HASP, Section 8.3.5 will be revised to read "...Urinalysis may be performed prior to the start of site activities, on a random basis and/or upon termination of work in the Exclusion Zone."

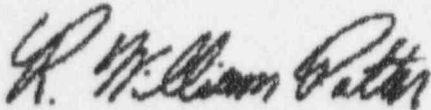
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Mr. William Snell  
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Page 2

At Chevron Chemical Company, safety is our first priority and we are committed to the prevention of accidental losses.

If you have any additional questions, please do not hesitate to call. I trust that this reply should close the issues in your findings for this assessment. If you have any further questions please feel free to contact me at (510) 842-5882.

Sincerely,



R. William Potter  
Senior Environmental Projects Engineer

RWP:rwf

cc: Ferdinand Rock - Foster Wheeler (Via FAX)



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**DATE:** Saturday, January 13, 1996

**TO:** William Snell, US Nuclear Regulatory Commission, Reg III

**FROM:** R. William Potter

**PAGES (Including this cover):** 3

**MESSAGE:**



Responsible Care:  
A Public Commitment

## TELEPHONE LOG

Call To: W. Snell

Date: March 6, 1996

Called By: Name: Bill Potters  
Organization: Chevron

SUBJECT: CHEVRON REMEDIATION, HARVARD AVE, CLEVELAND, OH

Discussion: Potter called to inform me that Chevron was going to halt remediation at the site. To date they have pulled down, deconned, and removed from the site, all pipes, wires and conduit. The remaining contamination is what is left on the walls, floor, ceiling and roof.

The reason for this is they are attempting to get DOE to pay for the cost of waste disposal. Although DOE reviewed this site in the past under FUSRAP, and determined they had no further liability, Chevron has stated that DOE never relinquished title to the material. Therefore, it still belongs to the government and the government should either come and get it or pay for disposal. Chevron's concern is if they move ahead and pay up front, DOE will never reimburse them. If they halt the work, then they have a much higher chance of at least resolving the issue now, possibly in their favor.

To stop work they intend to leave the drums of waste already generated in the building and surrounded by a fence with a locked gate; the building is shuttered and locked; the building is surrounded by a fence with a locked gate; and all that is on the Engelhard site which is surrounded by a fence a has a security guard at the gate to get in. They will also establish periodic surveys, etc.

For what its worth: the remaining contamination has already been their for 40-50 years; this site never had an NRC license; they have no license now.

4/51