

40-9027

**CABOT**

February 28, 1997

Mr. Robert A. Nelson  
Division of Waste Management, NMSS  
U.S. Nuclear Regulatory Commission  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852-2738

**RE: REQUEST FOR AMENDMENT TO LICENSE NO. SMC-1562  
MODIFYING SCHEDULE FOR SUBMITTAL OF  
DECOMMISSIONING PLAN**

Dear Mr. Nelson:

Under Condition 11 of Cabot Corporation's existing License No. SMC-1562, Cabot is required to submit either a Site Decommissioning Plan (DP) or an Environmental Report (ER) on March 6, 1997 for the Reading, Pennsylvania slag pile. On February 25, 1997, we met with you to discuss the status of our progress in developing either the DP or ER, and the outstanding issues which need to be resolved before a final approach for decommissioning the slag pile can be established. During the meeting, you stated that the NRC would consider a request from Cabot to extend the submittal date for the DP, provided that such a request was submitted no later than March 6, 1997.

Therefore, in accordance with our discussion, the purpose of this letter is to request an amendment to license SMC-1562 extending the date for submittal of the DP for the Reading slag pile until 90 days after the effective date of the NRC's pending final rule on "Radiological Criteria for Decommissioning". The bases for our request, as discussed during our meeting, are set forth below.

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

Cabot has been working diligently on developing an appropriate decommissioning approach for the Reading slag pile. In doing so, however, Cabot has reached the preliminary conclusion that removal of the slag material from the area and release of the Reading site for unrestricted use (as opposed to leaving the material on-site), is likely to be the preferred option. This option would simplify the decommissioning process, avoid the need to undertake complex slope stability analyses, and preclude potentially difficult negotiations with the land owner.

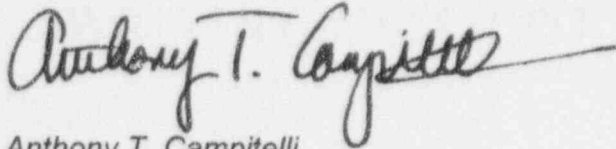
To date, however, Cabot has not been able to select the most appropriate off-site disposition option for the material that would be removed from the Reading site. We have been in discussions with Envirocare of Utah about the possibility of disposing of the slag at that facility. To date, we have had difficulty obtaining responses from Envirocare and, though we have made some progress, we have not yet been able to obtain a disposal price that is commercially viable.

Furthermore, Cabot has identified a second potential off-site disposition option that warrants further study. In particular, it may be possible to relocate the Reading slag to our Revere site. In order to determine the feasibility of this option, we will need to consider a number of factors. One of the most important of these is the nature of the final rule on radiological criteria for decommissioning to be published by the NRC in the near future. We understand that the final standards are imminent and may be released as early as within the next month or two. In particular, if, as has been stated by NRC Chairman Jackson, the criteria may include a dose standard in the range of 15-30 mrem/yr, that could have a significant impact on our ability to utilize the Revere site for the Reading slag. Because of the pendency of the final rule, we would like the opportunity to evaluate the final decommissioning criteria and use them to determine the most effective and efficient decommissioning option.

In NRC Safety Evaluation Reports on SMC-1562 dated August 19, 1996 and December 11, 1995, the NRC has stated that the Reading site "does not pose an immediate threat to public health and safety. Therefore, an extension of the deadline for submission of the DP will not have a negative health or safety impact. Furthermore, the requested extension is necessary to the effective conduct of decommissioning. Resolution of commercial issues with Envirocare and/or careful consideration of the requirements of the NRC's imminent decommissioning regulations should enable us to develop the most effective and efficient DP for the Reading slag pile without injecting undue delay.

Therefore, for the reasons described above, Cabot respectfully requests that License No. SMC-1562 be amended to extend the date for the submittal of the DP until 90 days after the effective date of the NRC's final rule on radiological criteria for decommissioning. Thank you for your consideration.

Sincerely,  
CABOT PERFORMANCE MATERIALS

A handwritten signature in black ink, reading "Anthony T. Campitelli". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

Anthony T. Campitelli  
Manager, Environmental Affairs

/cas  
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