February 28, 1997

Hearing Clerk
Ohio Environmental Protection Agency
P.O. Box 1049
Columbus, OH 43216-1049

Dear Sir:

On December 13, 1996, the Ohio Environmental Protection Agency (OEPA) issued for public comment its Preferred Plan for remediation of the Shieldalloy Metallurgical Corporation site in Cambridge, Ohio. The OEPA effort is being performed in parallel with the U.S. Nuclear Regulatory Commission development of an environmental impact statement that also examines various alternatives for remediating the same site.

We have enclosed our comments for your consideration. If you have any questions, please call me at (301)-415-6668.

Sincerely,

[Original signed by]

James E. Kennedy, Sr. Project Manager
Low-Level Waste and Regulatory
Regulatory Issues Section
Low-Level Waste and Decommissioning
Projects Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

Enclosure. As stated

License No. SMB-1597
Docket No. 040-8948

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

February 28, 1997

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Columbus, OH 43216-1049

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Enclosure: As stated

License No. SMB-1507
Docket No. 040-8948

February 28, 1997

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Columbus, OH 43216-1049

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NRC COMMENTS ON THE OHIO EPA PREFERRED PLAN OF DECEMBER 13, 1996

1. Additional consideration should be given to the potential adverse impacts to the ecosystem that could occur from excavating the soil and sediments from the wetlands, ditches, and stream channels. These impacts could include the loss of wetlands, short-term or long-term impairment of wetlands, or loss of Chapman Run habitats. The potential impacts of digging up the wetland soils, on-site sediments, and off-site sediments should be documented, discussed, and considered in the Preferred Plan.

2. Some of the considered alternatives do not appear to be biologically sound alternatives (e.g., rechannelization, capping the sediments and soils with gravel or top soil, etc.). A rationale as to why these were considered and why they were eliminated would be helpful in the document.

3. Page 41 - "Natural Recovery" is misnamed. This alternative involves the introduction of sand into the ecosystem. It is recommended that a true natural recovery alternative be added to the Preferred Plan for the wetland soils, on-site sediments, and off-site sediments. This alternative would assume that the sources of contaminants would be controlled and that the wetland soils, onsite sediments, and offsite sediments would be allowed to naturally recovery over time. Periodic monitoring of the site would take place to evaluate the success of the recovery.

4. The basis of all the costs in the Preferred Plan are not referenced. Costs that are documented in the FS should be referenced as such. A basis or a reference to the basis of all costs that are not from the FS should also be provided.

5. It appears that the conclusions of the Preferred Plan are inconsistent with the Feasibility Study for the Cambridge facility. The Preferred Plan states on page 49 that, "The preferred alternative includes the excavation and removal of contaminated sediments and soils from on-site drainage channels, sedimentation deltas, wetland soils, and Chapman Run." This is different from the FS, page 6-2. The FS states that an alternative for wetlands soils could be a combination of focused sediment removal and no action for the remaining areas. Please provide the rationale for these differences.

6. It is recommended that a different approach be considered for the Preferred Plan. Why not control the sources of the contaminants (i.e., the active slag pile operations) and then allow the natural processes (i.e., wetland bioattenuation, natural sedimentation, and natural biodegradation) to restore the area? This is similar to the approach mentioned on page 6-2 of the FS for wetland soils but would also apply to the on-site sediments and off-site sediments. The natural processes may help the site to recover to the point that the risk becomes acceptable to ecological receptors in the streams and wetlands. If, however (in the future after the west slag pile was capped, as part of the periodic monitoring) it was found necessary to dig up soils and/or sediments and place them on the west slag pile; a new cell could be accommodated easily on top of the pile. By taking this phased approach to the remediation of soil and sediment contamination, wetlands may be preserved and unwanted

resuspension of metals could be avoided.

7. Page 50, first paragraph - It would be helpful if there were a map that depicted the expected area of on-site and off-site sediments that would be removed using the 1280 mg/kg criteria.