



UNION CARBIDE CORPORATION
P.O. BOX 8361, SOUTH CHARLESTON, WV 25303

March 6, 1997

Mr. Clayton Pittiglio
Nuclear Regulatory Commission Headquarters
Washington, DC 20555
TWF7F27

RE: February 1997 Status report for Elkem Metals Building 78 SDMP Site

Dear Mr. Pittiglio:

The following is a report prepared by Union Carbide Corporation regarding the activities from February 6 to March 5, 1997 related to the radioactive materials found at the Elkem Metals facility in Marietta, Ohio.

Activities From February 6 to March 5, 1997

Ohio EPA has verbally indicated that the agency agrees with the assessment of Union Carbide regarding the classification under RCRA for the containerized waste at the site. The classification is non-hazardous. A letter is forthcoming.

During the report period, Norris Environmental contacted several major engineering firms with significant practice in the radiological field. No firm was found that is familiar with the NRC D and D risk assessment software.

On February 10, Kemron Environmental Services inventoried and retrieved composite samples of the materials stored in containers at the site. The composite samples had been generated several years ago, and stored on site for possible future use. The samples were shipped to Barringer Labs in Golden, Colorado on February 11. Barringer has initiated gamma spectroscopy analysis to determine the isotopic content of each of the 20 container composites. This data will be helpful in arranging for disposal of the wastes.

On February 14, a copy of letter was received from Eveready Battery. The letter, addressed to Region III of the NRC, requested that the status of decommissioning of the site be evaluated, and that the release of the site be expedited.

On February 19, UCC responded to the letter to Region III NRC submitted by Eveready Battery.

On February 24, a conference call was held among NRC Headquarters, NRC Region III, ORISE, UCC and Norris Environmental staff. In the call, it was agreed that the D and D exposure analysis software should be run to determine if there is an exposure risk before more

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data is collected from the roof of Building 78. The Final Status Report will be divided into two phases. Phase I will represent the outdoor areas and the north Quonset hut. Phase II will report on the findings from the south Quonset hut and Building 78. The Phase II report cannot be prepared until the wastes stored in containers in Building 78 is disposed.

Also on February 24, a meeting was held with Rik Melvin, of Elkem Metals, to review the status and plan future work for this project. Elkem is supportive of splitting the site into two parts for reporting and release.

On February 26, UCC submitted the Closure Plan for the site. The Plan was submitted in two formats. Deletions to the previous edition of the Plan were noted by strike-through and additions were underlined. A clean copy, showing the text after revisions, was also provided.

Several telephone calls were made through the reporting period to determine the feasibility of use of a new waste disposal site in west Texas. Waste Control Specialists own 15,000 acres of land, straddling the New Mexico-Texas border. The company has a RCRA/TOSCA landfill which is now operating. A permit application was submitted on December 19, 1996 for disposal of government-generated low level radioactive wastes. The site also has separation technologies available. The Thermal NUTech segmented gate process is set up and ready or nearly ready to process waste. This process sorts soils by radioactivity, splitting the soils into "radioactive" and "clean" piles. The radioactive portion is then disposed in a commercial facility. For more information on Waste Control Specialists, call Dan Belger at (713)944-5900. For more information on the Segmented Gate system, call Mr. Jeff Brown at (412)481-0683. From this information, it appears that the separation of the Marietta wastes with the Segmented Gate system could be performed from a permitting perspective, but the effectiveness of the sorting is unknown. The Waste Control Specialists radioactive wastes disposal site cannot be used for the Marietta wastes because it will be permitted only for US government wastes.

Several calls were made to Washington State regarding the Dawn Mine site. Management for this site expects the facility to be opened by June 1997 for 11e2 waste streams. An evaluation is under way to determine if the Marietta wastes could be classified as 11e2 for disposal at this site. For additional information regarding this disposal site, contact Bob Nelson of Dawn Mining at (509)258-4511.

Work is continuing to determine the feasibility of using other private disposal sites, through UCC's Umetco subsidiary.

The light bulbs in Building 78 were replaced by Elkem staff, in response to a note in the NRC inspection report.

Planning of transportation of the wastes to a disposal site is under way. An initial evaluation indicates that the containers now holding the radioactive materials are suitable for loading and transporting the materials by tractor trailer. Transport by truck appears more feasible than by rail. No special permits are necessary to transport.

Activities Planned for the Next Six Weeks

UCC expects to receive a response from Ohio EPA regarding the RCRA classification of the material.

Receive the results of the radiological characterization of the containerized soils. Forward this information on to potential waste disposal sites, so that evaluation of the sites for disposal of the Marietta wastes can be completed. Continue the evaluation of commercial disposal sites.

Continue the evaluation of private disposal sites, through UCC's Umetco subsidiary.

Reduce data collected from the site to usable information. The data includes surveys around quadrant Q-12 in Building 78, survey data around the ore pad, survey data from the Quonset huts, and the elemental isotopic analysis of soil samples. The Phase I Final Status Report should be completed and submitted by April 15.

Perform the D and D exposure analysis on the beta version of the software provided by NRC for the roof of Building 78.

Very truly yours,



S. G. Gilbert, P. E.
Program Manager

SGG:dvc

cc: Ms. Donna Moser (NRC)
Mr. Richard Melvin, Elkem Metals
Mr. Sean Norris, Norris Environmental
Mr. Frank Talbot, Ohio Department of Health
Mr. John House, NRC Region III
Mr. Thomas Houser, Eveready Battery
Mr. Tim Vitkus, ORISE