



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

February 19, 1997

Ms. Cynthia D. Pederson, Director  
Division of Nuclear Materials  
United States Nuclear Regulatory Commission  
Region III  
801 Warrensville Road  
Lisle, Illinois 60532-4351

Re: Union Carbide Activity for the Elkem Metals Building 78 SDMP Site

Dear Ms. Pederson:

I received on February 14, 1997 the letter of Mr. J. T. Houser, of the Eveready Corporation, regarding the subject site. The letter requested your review of the status of this site, and also asks for expedited attention leading to unrestricted release of the site. This site is located near Marietta, Ohio and includes real estate presently owned by Eveready.

Enclosed are two progress reports for your information. They were submitted by Union Carbide recently to Nuclear Regulatory Commission staff in Washington. The first report summarizes the actions taken in 1996 at the site. The second report indicates the progress made in January 1997, and near-term plans for additional work.

Union Carbide is vigorously seeking to resolve the issues at this site. Progress has been hampered by the lack of suitable and economically feasible disposal sites, nationwide, for slightly radioactive materials.

Should you or your staff have questions or comments about the enclosures or the activities of Union Carbide at this site, please call me. My telephone number is (304) 747-5326.

Very truly yours,

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

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enclosures: January 1997 Status Report  
1996 Status Report

cc: S. Norris, Norris Environmental  
J. T. Houser, Eveready Battery  
Clayton Pittiglio, NRC Washington  
Rik Melvin, Elkem Metals  
John House, NRC Region III

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

February 7, 1997

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

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

Dear Mr. Pittiglio:

This is a report prepared by Union Carbide Corporation regarding the activities from January 1 to February 6 1997 related to the radioactive materials found at the Elkem Metals facility in Marietta, Ohio.

Activities From January 1 to February 6, 1997

A lengthy letter was sent to the Ohio EPA in support of UCC's declaration that the materials stored at the Elkem site are not RCRA hazardous waste. The letter was issued January 15.

On January 21 and 22, Union Carbide staff met with representatives of Umetco (a wholly owned subsidiary of UCC) and Norris Environmental to evaluate options for disposal of the materials at a company-owned site. Work continued in the evaluation of regulatory hurdles which would need to be cleared before using such a site.

On January 27, in a telephone call to UCC, the NRC stated it was considering legal action as a result of UCC's delay in disposing of the wastes stored at the site.

A status report on activities for 1996 was submitted to the NRC on January 30.

On January 31, a letter was received from the NRC providing comments on the closure plan for the site. Clarification of several points of the letter was requested and received via telephone and e-mail.

On January 31, UCC submitted the Annual Waste Generator report to the Ohio Department of Health, Bureau of Radiation Protection.

In several telephone calls through the month, WMX provided waste characterization needed for disposal of the materials at the US Ecology site in Richland Washington, and the Chem-Nuclear site in Barnwell, South Carolina.

UCC received copies of reports prepared by the NRC and Ohio Department of Health from their December 1996 inspections.

Activities Planned for the Next Six Weeks

Recover composite sample splits of the materials, now stored at the site, for analysis in support of waste characterization. The planned analysis is gamma spectroscopy for isotopic quantification of radioactive elements.

After receipt of the waste characterization data, transmit the data to WMX for evaluation of commercial disposal sites.

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

Reduce data collected from the site to usable information. The data includes:  
surveys around floor grid Q-12 (post-remediation) in Building 78,  
radiological survey results and analytical results for soils around the ore pad,  
surface contamination characterization survey results from the Quonset huts.

Participate in a conference call to be set up by the NRC, as discussed the letter of January 27. Resolve the two issues in the letter in the call. Request NRC to issue a letter approving the Closure Plan.

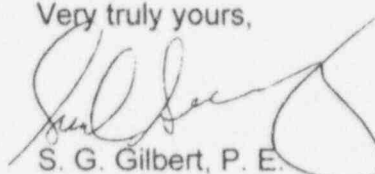
Perform the D and D exposure analysis on the beta version of the software provided by NRC for the roof of Building 78. The computer model is expected to generate a release criteria for the building roof.

Replace the light bulbs in Building 78, as noted in the NRC inspection report.

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

Discuss with NRC representatives the concept of release of the site in two stages. The first stage would be all outdoor areas. The second stage would be the release of Building 78 and the Quonset huts.

Very truly yours,



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

SGG

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