



November 29, 1999
99-1148

U. S. Nuclear Regulatory Commission
Mr. Joe Decicco, NMSS/IMNS/OB
Washington, D.C. 20555-0001

Subject: Depleted Uranium Aircraft Counterweights (Parts Listings)

Dear Mr. Decicco,

We are continuing to develop information concerning the DU aircraft counterweight situation. I am taking the liberty of sharing it with you so that the information notice you are preparing will be based on the best possible appreciation and understanding of the current realities.

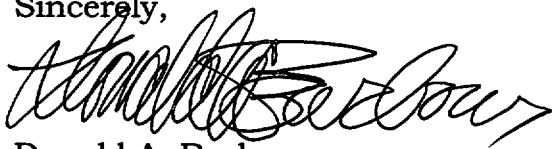
One area we have been exploring is the nature of the holdings of counterweights by aviation parts dealers. We were interested in the number of companies possessing the parts and the size and condition of their inventories. We recently searched a major commercial automated database that is used by all aircraft parts traders, repair organizations and airlines. We ran all of the part numbers for DU counterweights for the 747, DC-10 and L-1011 planes. This involved some 92 different counterweights for the 747, 17 counterweights for the DC-10 and 35 counterweights for the L-1011. The resultant listings show a significant quantity of counterweights in the possession of a number of companies. Eighteen companies were listing a total of 111 DU 747 counterweights. A total of 51 DC-10 DU counterweights were listed by nine companies, and 19 companies were listing 1,581 DU counterweights for the L-1011. Some of the companies are large businesses with substantial resources, while some are quite small. We know that the listings cover only a small fraction of the counterweights in circulation, and we are picking up weights for disposal from companies that are not listing them with for sale. A comparison with reports of past searches confirms that there is little or no movement in these inventories. The condition codes are also informative. The counterweights are all so old that corrosion is probable for all of them but is

especially likely on the many counterweights coded "as removed" or "serviceable", which would indicate parts taken off aircraft and added to inventory without repair.

One fact did cause us some surprise. Although we are just starting to build up our database for military and naval aircraft DU counterweights, we also searched the availability of a few selected part numbers for counterweights for general aviation and military planes. Although the report included only a few part numbers, we discovered significant inventories held by civilian companies. These holdings include DU parts for aircraft no longer in U.S. inventories (e.g. A-7 Corsair) and parts which have been replaced with tungsten equivalents on operating aircraft (e.g. P-3 Orion). In other words, there are inventories of parts for which there is no credible present or future demand. We have also uncovered unconfirmed anecdotal evidence that at least some of these military and naval counterweights may not have been marked as depleted uranium or with the other information required for the original NRC exemption. We are continuing our researches into the distribution of military and naval aircraft counterweights and will apprise you of future discoveries.

We appreciate the NRC's decision to address the depleted uranium aircraft counterweight situation, and we will do everything that we can to insure that its policies and actions are based on the fullest and most comprehensive appreciation of the relevant facts. Please contact me if there is any additional information that I can provide.

Sincerely,



Donald A. Barbour
Project Manager, Depleted Uranium Programs