



May 18, 2000

Mr. Mike McCann
U.S. Nuclear Regulatory Commission
Region III
801 Warrenville Rd.
Lisle, Illinois 60532

**Re: Former Michigan Chemical Company Low Level Radioactive Disposal Site
Breckenridge, Michigan**

Dear Mr. McCann:

This correspondence is submitted pursuant to the June 11, 1999 and February 22, 2000 correspondence from NWI Land Management (NWI) regarding the former Michigan Chemical Company low level radioactive disposal site in Breckenridge, Michigan (Site or Breckenridge Disposal Site). The June 11, 1999 correspondence proposed phases of activities to be performed to bring this site to an acceptable closure, and indicated that monthly progress reports would be submitted describing the progress being made regarding the scheduled activities. The February 22, 2000 correspondence was submitted pursuant to a January 21, 2000 meeting between the U.S. Nuclear Regulatory Commission (NRC), NWI, and SCIENTECH NES, Inc (NES), NWI's radiological consultant, and contained a revised schedule and phases of activities. This progress report pertains to the time period from April 1, 2000 to May 12, 2000.

During the January 21, 2000 meeting, options were discussed for the acceptable closure of the Breckenridge Disposal Site. The NRC indicated that applicable formal NRC positions regarding radiological criteria are not yet finalized. However, the NRC noted that the site may be acceptable for closure if the current and future public risk is no more than 100 millirem per year, and the specific activity of the exhumed material would not be licensable under a probable end use scenario. In the February 22, 2000 correspondence, NWI proposed to perform a preliminary dose assessment, additional characterization activities and a revised dose assessment (considering the additional characterization data).

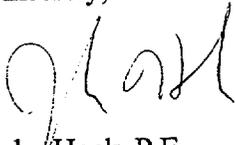
Last week, NES completed the Preliminary Dose Assessment for the Breckenridge Disposal Site consistent with schedule contained in the February 22, 2000 correspondence. The dose assessment generally consisted of simulations of the RESRAD computer code using a resident farmer scenario, and used available site-specific data coupled with default RESRAD data. During the first simulation, dose was assessed from a small volume of waste that is brought to the surface and spread out over an area, as a result of excavating a basement for a residence. The second, or subsurface, simulation assessed the dose from the remaining underground waste. The total dose that an individual could receive was obtained by integrating and summing the doses from the two scenarios. The dose assessment showed that the total dose for the Breckenridge Disposal Site using the dual simulation model was less than 100 millirem per year, and that the specific activity of the exhumed material would be less than 0.05% by weight.

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Consistent with the schedule contained in the February 22, 2000 correspondence, NWI intends to submit a work plan to the NRC by June 21, 2000 proposing to conduct additional characterization activities at the site. The characterization activities are intended to better define some of the key assumptions and data inputs of the Preliminary Dose Assessment. Consequently, the details of the Preliminary Dose Assessment will be included in the work plan as support for the proposed activities. The activities are tentatively scheduled to be performed in September 2000 assuming the work plan is approved by the NRC by August 21, 2000.

If you have any questions regarding this matter, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Hock".

John Hock, P.E.
Environmental Project Manager

cc: Bruce Jorgensen, NRC
Mike Prattke
George Harvell
Ken Kasper, NES