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September 22, 2000

United States Nuclear Regulatory Commission - Region 1  
475 Allendale Road  
King of Prussia, Pa. 19406-1415  
Attention: George Pangburn

37-00030-02

Reference: Your letter dated August 22, 2000 - Docket No. 03005980

Dear Mr. Pangburn,

As you are aware, we are presently unable to dispose of the radioactive waste that we removed from the underground silos due to its' high level of radioactivity and mixed waste component. No known disposal sites are able to handle this material in its' current form at this time.

This was not expected. As recently as June 30, 2000, based on the information provided to us by our remediation contractor, IT Corporation, we fully anticipated shipping the waste to Envirocare. That was the plan of action that we shared with you at our June meeting. Unfortunately this has not been possible. IT Corporation was unable to adequately sort, segregate and package the various waste components from the silos as they were contracted to do. It is now evident that the radioactivity level of the majority of the drums exceeds the acceptable limits of the potential disposal sites.

Since learning of this problem, we have had extensive discussions with IT Corporation concerning how to resolve this matter. Unfortunately, to date, they have not offered any workable solution. Although we are continuing a dialogue with them, in the meantime, we are pursuing other remedies.

At present, it appears as though the best course of action requires opening the existing waste containers and sorting and repackaging their contents into shippable volumes that will fall beneath the acceptable limits of the disposal sites. We have solicited and received a proposal from GTS Duratek to perform this service. Their proposal is currently under review.

If accepted, GTS Duratek expects that they can move quickly. Within two weeks of the signing of a contract, they would have a Work Plan and Health and Safety Plan ready for submittal to you. Upon approval of their Plans, they expect that it would take them approximately 2 weeks to be fully mobilized at our site. They then estimate that they would require approximately 2 months to sort the materials. Their plan is to empty the existing containers, sort and segregate the waste into disposable lots, and repackage it

in B-25 boxes. These B-25 boxes would be housed under roof in the former structure used to cover the silos during the extraction process.

All the B-25 boxes would then be sampled. They expect the analytical analysis to come back from the laboratory approximately 4 to 8 weeks after submittal. At that time, GTS Duratek would determine where to send the waste on a container-by-container basis and would begin work immediately to obtain the necessary approvals from the potential disposal sites. The timeline for this is less predictable as we will have to wait for Envirocare or others to give us their acceptance of the waste. However, as soon as acceptance is received, we would work diligently to expedite shipment.

Be assured that we share your concern and the concern of the Pennsylvania Department of Environmental Protection for a timely resolution of this problem. We too want to see this waste move off-site to a proper waste facility as soon as possible. The silo remediation project was undertaken with the very best of intentions and no one could have predicted our current impasse.

We expect to be able to move forward with GTS Duratek shortly. We look forward to meeting with you to discuss this matter further.

Regards,

  
William E. Lynch Jr.  
Vice President