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Pennsylvania Department of Environmental Protection
Bureau of Land Recycling and Waste Management
Rachel Carson State Office Building
P.O. Box 8471
Harrisburg, PA 17105-8471

37-00030-02
030-05980

Attn: Mr. James P. Snyder

Reference: Your letter of September 1, 2000

Dear Mr. Snyder,

This is in response to your letter of September 1, 2000. As the Department of Environmental Protection is aware, we have been working under the guidance of the Nuclear Regulatory Commission to affect the necessary remediation work at our Bloomsburg site.

After completing an extensive radiological characterization and a corresponding decommissioning plan for the site as required by the Nuclear Regulatory Commission, our first project involved the removal of the two underground silos and their contents. This project was initiated in 1999 and has been successful to the extent that the silos and their contents have been removed from the ground and are now stored in a combination of 55 gallon drums and B-25 boxes. Unfortunately, a large portion of the materials removed from the silos, as currently packaged, constitutes mixed waste. We are presently unable to dispose of this mixed waste due to its high level of radioactivity. No known disposal sites are able to handle this material in its current form at this time.

At the time the project was initiated by our remediation contractor, IT Corporation, there was no indication that the contents of the silos could not be disposed of at an appropriate licensed disposal facility. Indeed, as recently as June 30, 2000, based on the information provided to us by IT Corporation, we fully anticipated shipping the waste to Envirocare in Utah. That was the plan of action that we shared with the NRC and representatives of the Commonwealth at our June meeting. Unfortunately this has not been possible. IT Corporation did not adequately sort, segregate and package the various waste components from the silos. 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. They have informed us that they are presently working on a plan to sort, separate and characterize the materials in an effort to render it suitable for disposal.

NMSS/RGN MATERIALS-002

In the meantime, we have also solicited and received a proposal from GTS Duratek to perform this same service. Their proposal is currently under review.

However, before proceeding further, we would like to have a meeting with the DEP and the NRC to discuss and mutually determine the next steps to be taken. While we certainly share the concerns of the DEP and the concerns of the NRC for a timely resolution of this current problem, we believe that the interests of the public will be best served if all parties involved can establish a coordinated gameplan for the site. We therefore request that any discussion of a further site characterization be postponed until such time as we can meet to discuss the current situation.

At the proposed meeting, we would also like to share the history of the site, our current monitoring activities, and the results of this monitoring with the Department to help it better understand the site. The contamination at the site is the result of fully legal activities that took place during the 1950's, 1960's and possibly 1970's. Current manufacturing activities are not adding or contributing to the problem in any way. Further, we believe that it is important to point out that we did not purchase the adjoining property due to tritium contamination of the groundwater. None of the offsite wells that we monitor has ever tested near or above EPA drinking water limits for radionuclides.

We look forward to meeting with you soon.

Regards,


William E. Lynch Jr.
Vice President

Cc: Mr. George Pangburn, NRC Region 1