

# RONSON CORPORATION

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EXECUTIVE OFFICES

J-5

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040-08843

November 17, 2000

VIA FAX

Mr. Steve Schaffer  
Mail Control No. 124941  
United States Nuclear Regulatory Commission  
Region 1  
475 Allendale Road  
King of Prussia, PA 19406-1415

Re: Prometcor, Inc. - Newark Site

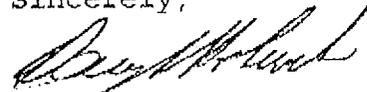
Dear Steve:

Please accept this letter as authorization for Sovereign Consulting to submit a request letter to the NRC for approval to ship material to the WCS facility in Andrews, Texas.

If you need anything further, please call me.

Thank you for your help.

Sincerely,



Daryl K. Holcomb  
Vice President &  
Chief Financial Officer

DKH/dc

cc: Marc Cicalese  
Jack Buddenbaum

128870

NMSS/RGN MATERIALS-002



Mr. Steve W. Shaffer, Health Physicist  
Decommissioning and Laboratory Branch  
United States Nuclear Regulatory Commission  
Region 1, Mail Control No. 124941  
475 Allendale Road  
King of Prussia, PA 19406

November 16, 2000

**Re: Prometcor, Inc., (NRC License No. STB-1451)**

Dear Mr. Shaffer:

As we discussed during our site meeting on November 9, 2000, the USNRC allows for shipment and disposal of "Unimportant Quantities of Source Material" as defined in 10 CFR 40.13 to the Waste Control Specialists facility located in Andrews, Texas. The purpose of this letter is to inform you of our intention to ship packaged waste from the Prometcor site to the WCS facility. On behalf of Prometcor, Inc. (formerly Ronson Metals), Sovereign Consulting Inc. will complete the necessary sampling and shipment preparations for soils and other debris as necessary that was excavated during decommissioning activities at the site. Soil sampling will be conducted in accordance with the USNRC agreed upon sampling procedure that consist of two composite samples per 30 cubic yards of excavated soil. Each composite will consist of soil collected at four separate locations. We acknowledge that the sampling plan used for material being shipped to WCS does not have to be approved by the NRC. However, we feel the above sampling approach provides results that are representative of actual radionuclide concentrations.

The USNRC policy allows licensed facilities to ship unimportant quantities of source material to the WCS facility without the need to manifest the material as low-level radioactive waste. However, we are required to write and inform the USNRC of our intent to utilize this policy for purposes of shipping the subject material. Prometcor has an estimated 1,500 cubic yards of low-level radioactive soil generated during excavation activities. The WCS facility will accept thorium concentrations up to 110 pCi/g. Laboratory results for samples taken from the subject soils indicate that the average Th-228/total thorium levels are well below the WCS limit.

Prometcor intends to transfer the material in accordance with 10 CFR 40.51 (b)(4). Under State of Texas law, WCS can accept source material that meets the exemption requirements defined in Texas Administrative Code, Section 285.251(C)(1), which is the Texas Agreement State counterpart to 10 CFR 40.13(a). We are aware that WCS has accepted other shipments of source material under these provisions.

It is our intentions to ship this material before the end of this year. We would appreciate you expeditious review and approval of this request so that we can complete the decommissioning of the Prometcor site. If you have any questions please contact either me at (216) 272-7799 or Marc Cicalese at (973) 439-5757.

Sincerely,

Jack Buddenbaum, C.H.P.  
Principal Scientist

cc: Mr. Daryl Holcomb  
Dr. Edward David  
Mr. Marc Cicalese

BETWEEN:

License Fee Management Branch, ARM  
and  
Regional Licensing Sections

: (FOR LFMS USE)  
: INFORMATION FROM LTS  
: -----  
:  
: Program Code: 11900  
: Status Code: 0  
: Fee Category: 14  
: Exp. Date: 20020430  
: Fee Comments: 14 EFF 8/18/98  
: Decom Fin Assur Req'd: Y  
: .....

LICENSE FEE TRANSMITTAL

A. REGION **I**

1. APPLICATION ATTACHED  
Applicant/Licensee: PROMETCOR, INC.  
Received Date: 20001117  
Docket No: 4008843  
Control No.: 128870  
License No.: STB-1451  
Action Type: Amendment

2. FEE ATTACHED  
Amount: -----  
Check No.: -----

3. COMMENTS

Signed M. A. Perkins  
Date 11/20/2000

B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered /\_\_\_/)

1. Fee Category and Amount: -----

2. Correct Fee Paid. Application may be processed for:  
Amendment -----  
Renewal -----  
License -----

3. OTHER -----  
-----

Signed -----  
Date -----

This is to acknowledge the receipt of your letter/application dated  
11/17/2000, and to inform you that the initial processing which  
includes an administrative review has been performed.

*AMEND. 578-1451* There were no administrative omissions. Your application was assigned to a  
technical reviewer. Please note that the technical review may identify additional  
omissions or require additional information.

Please provide to this office within 30 days of your receipt of this card

A copy of your action has been forwarded to our License Fee & Accounts Receivable  
Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned Mail Control Number 128870.  
When calling to inquire about this action, please refer to this control number.  
You may call us on (610) 337-5398, or 337-5260.

Sincerely,  
Licensing Assistance Team Leader