

41-1520

# Fansteel Inc.

number ten tantatum place muskoguee, oklahoma

December 13, 2000

FAX VIA 301-415-5397  
HARD COPY TO FOLLOW

ATTN: Document Control Room  
Washington, D.C. 20555

Mr. Mohammad Haque  
Fuel Cycle Licensing Branch  
Division of Fuel Cycle Safety  
And Safeguards, NMSS  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Subject: Readiness Review

Dear Mohammad:

Pursuant to your recent visit of November 14, 2000 and previous correspondence with Heather Astwood, please find attached a list of specific chemicals at issue as described in the May 3, 1999 letter and the pilot quantities that will be utilized in Fansteel's metal recovery operation in Muskogee, Oklahoma. In keeping with the intent of Fansteel's license at Section 4.3 and discussions held during the May 31, 2000 Management meeting in Arlington, Texas, Fansteel has applied the OSHA Process Safety Management (29 CFR 1910.119) criteria to the attached list of chemicals. The result of this evaluation demonstrates, based on concentrations and threshold quantities, the above listed regulations do not apply to Fansteel's Muskogee operations at this time. However, Fansteel does believe this regulation provides good operating protocol guidelines and is considering the incorporation of certain aspects of these into its overall administrative controls.

Mohammad Haque

As discussed with both you and Ms. Astwood, Fansteel's initial efforts will be focused on proving the process chemistry within individual circuits of the plant. This will involve processing small quantities of WIP material in a pilot batch configuration. This will allow process chemistry and plant operations to be optimized before moving into commercial operations. At present, the startup schedule places the pilot mode of operation into late December 2000/early January 2001. Fansteel understands NRC will conduct an inspection of readiness to proceed with commercial operations as stated by NRC in correspondence to Fansteel of June 16, 2000. Once the pilot work has been completed, the NRC will be given notification that Fansteel is ready to move into commercial operations. It is anticipated that this will occur sometime in February 2001.

If you have any questions regarding this matter please contact me at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Fred Dohmann', written over the word 'Sincerely,'.

A. Fred Dohmann  
General Manager

FD/la

Attachments

Copy to: Louis Carson, NRC  
Michael J. Mocniak  
Keyton Payne  
File (NRC1-12-10-00-0)

<b>MATERIAL</b>	<b>CAS #</b>	<b>STATE</b>	<b>SOLUTION %</b>	<b>*QUANTITY (SOLUTION IN POUNDS)</b>	<b>CRITERIA</b>
Ammonia	7664-41-7	Liquid	19%	11, 000 lbs.	Only applies to solutions > 44%.
Hydrochloric Acid	7647-01-1	Liquid	34%	2,700 lbs.	N/A. Only applies to gaseous forms.
Phosphoric Acid	7664-38-2	Liquid	85%	1,000 lbs.	N/A. Not listed.
Sulfuric Acid	7664-93-9	Liquid	93%	62,400 lbs.	N/A. Not listed.
Sodium Hydroxide	1310-73-2	Liquid	50%	34,000 lbs.	N/A. Not listed.

*\* Estimated quantities used for pilot cycles.*