

SOVEREIGN CONSULTING INC.

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

Re: Thorium Results for Soil Samples Collected at the Prometcor Site and Request for a License Amendment to Release Soils Excavated within the Parking Lot and Building 6 Area (License No. STB-1451)

Dear Mr. Shaffer:

On behalf of Prometcor, Inc. (formerly Ronson Metals), Sovereign Consulting submits the enclosed sampling results (Attachment I) to the USNRC, Region I for their review and approval. The attached results represent measured thorium-228 concentrations in soil samples collected from the subject, excavated soils at the Prometcor site. As agreed upon with the NRC, two composite samples were collected from each pile and analyzed for thorium-228. The attached sampling results demonstrate that the excavated soils from the parking lot and Buildings 6 area possess thorium concentrations that are within the USNRC total thorium limit of 10 pCi/g (i.e., all Th-228 less than 8 pCi/g) and can be released for unrestricted use. As previous data for the parking lot and the entire site have shown, analysis for Th-232 and Th-230 was not necessary since all measured, total thorium levels at the site. Per the agreement between Ronson Corporation and USNRC, as long as the Th-228 level is not greater than 8 pCi/g for a given sample, analysis for Th-232 and Th-230 is not necessary for the release of the soils represented.

On behalf of Prometcor, Inc, Sovereign Consulting requests that Region I of the U.S. Nuclear Regulatory Commission, at their earliest convenience, complete their review of the subject data and execute the necessary license amendment releasing the subject soils for unrestricted use.

If you have any questions, please do not hesitate to contact me at (216) 272-7799 or at (216) 921-8398. Thank you for your prompt consideration to this matter.

Sincerely,

Jack Buddenbaum, CHP Principal Scientist

cc: Mr. Daryl Holcomb (Ronson Corporation) Dr. Edward David Jenny Goodman (NJDEP) Marc Cicalese



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ATTACHMENT 1: PROMETCOR, PARKING LOT/BLDG 6 SOIL PILES, SAMPLING RESULTS FOR THORIUM-228

| PILE DESIGNATION | Estimated Volume cu. yards. | Composite Sample-01 Th-228 (pCi/g) | Composite Sample-02 Th-228 (pCi/g) | PILE AVERAGE Th-228 (pCi/g) |
|---------------------|-----------------------------------|---------------------------------------|---------------------------------------|-----------------------------------|
| | | | | |
| R-2 | 20 | 1.60 | 1.90 | 1.75 |
| R-3 | 20 | 2.11 | 2.16 | 2.14 |
| R-4 | 20 | 2.30 | 1.78 | 2.04 |
| R-5 | 20 | 2.40 | 5.70 | 4.05 |
| R-6 | 20 | 2.18 | 1.92 | 2.05 |
| R-7 | 20 | 2.50 | 2.40 | 2.45 |
| R-8 | 20 | 2.60 | 4.10 | 3.35 |
| R-9 | 20 | 1.50 | 2.42 | 1.96 |
| R-10 | 20 | 2.00 | 1.70 | 1.85 |
| R-11 | 20 | 0.00 | 1.44 | 0.72 |
| R-12 | 20 | 2.26 | 2.44 | 2.35 |
| R-13 | 20 | 2.80 | 2.50 | 2.65 |
| R-14 | 20 | 2.80 | 1.30 | 2.05 |
| R-15 | 20 | 1.68 | 1.78 | 1.73 |
| R-16 | 20 | 2.10 | 1.76 | 1.93 |
| R-17 | 20 | 3.10 | 1.69 | 2.40 |
| R-18 | 20 | 1.92 | 2.60 | 2.26 |
| R-19 | 20 | 2.38 | 1.81 | 2.10 |
| R-20 | 20 | 0.00 | 2.60 | 1.30 |
| R-21 | 20 | 2.28 | 3.90 | 3.09 |
| R-22 | 20 | 2.01 | 1.80 | 1.91 |
| R-23 | 20 | 1.87 | 3.20 | 2.54 |
| R-24 | 20 | 2.05 | 2.16 | 2.11 |
| R-25 | 20 | 2.90 | 2.50 | 2.70 |
| R-26 | 20 | 2.61 | 3.00 | 2.81 |
| R-27 | 20 | 0.00 | 3.80 | 1.90 |
| R-28 | 20 | 4.60 | 3.50 | 4.05 |
| R-29 | 20 | 1.68 | 2.77 | 2.23 |
| R-30 | 20 | 2.93 | 2.10 | 2.52 |
| R-31 | 20 | 1.84 | 2.14 | 1.99 |
| R-32 | 20 | 2.18 | 1.22 | 1.70 |
| R-33 | 20 | 2.10 | 1.70 | 1.90 |
| R-34 | 20 | 1.76 | 1.30 | 1.53 |
| R-35 | 20 | 1.57 | 1.74 | 1.66 |
| R-36 | 20 | 1.78 | 1.80 | 1.79 |
| R-37 | 20 | 1.14 | 0.00 | 0.57 |
| R-38 | 20 | 0.94 | 1.41 | 1.18 |
| R-39 | 20 | 1.57 | 1.46 | 1.52 |
| R-40 | 20 | 1.44 | 1.14 | 1.29 |
| R-41 | 20 | 1.91 | 1.73 | 1.82 |
| - | 820 | | Avg. of all piles | 2.09 |

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Avg. of all piles

2.09