

Fansteel Inc.

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November 09, 2000

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: Request for additional information of July 31, 2000 – TAC L13179
(Formerly TAC L20669)

References:

1. Letter from A. Fred Dohmann, Fansteel, to U.S. Nuclear Regulatory commission Document Control Desk, "Reply to Notice of Violation", May 26, 2000.
2. Letter from Dwight D. Chamberlain, U.S. Nuclear Regulatory Commission, to Michael J. Mocniak, Fansteel Incorporated, "Response to NRC Inspection Report 40-7580/00-01 and "Notice of Violation", July 20, 2000.

Dear Mr. Haque:

The following information is provided with respect to NRC's review of a request for modification of the Eastern Property Decommissioning Plan (Plan). Regarding Item 1) of the subject request, Section 2.1.2.8.2 of the Plan has been revised to include a description of each of the water treatment systems available at Fansteel: the evaporation process and the wastewater treatment system.

Regarding Item 2) of the subject request, the wording referring to discharge limits is no longer included in the proposed revision to Section 2.1.2.8.2. Since the discharge limits are applicable independent of the plan, it is not necessary to state such specifically.

Regarding Item 3) of the subject request, the following description is provided (see also references 1 and 2). The groundwater collection system was included as part of the Plan in order to capture impacted groundwater before it leaves the site. The evaporation process was included as part of the design. Use of the evaporation process was described

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in the Plan, which contemplated that captured groundwater would be evaporated and any solids remaining would be mixed with the process feed streams.

Currently, as the plant is not in operation, the solids resulting from the evaporation process are processed through the wastewater treatment system and transferred to ponds 8 or 9. In other words, all solids resulting from treatment of groundwater are deposited in process feed streams, whether or not the evaporation process is in operation. The proposed change to Section 2.1.2.8.2 would allow groundwater to be processed directly through the wastewater treatment system; i.e. without first passing through the evaporation process. This means a larger volume with a lower radioactivity concentration, as compared to the solids from the evaporation process, will pass through the wastewater treatment system. Therefore, contrary to the concern expressed in the subject request, elimination of use of the evaporation process for treatment of groundwater will increase the volume of solids transferred to Pond 9, but decrease the respective radioactivity concentrations.

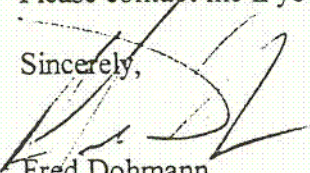
The fact that ponds 8 and 9 include a synthetic liner and underlying leak detection system should be noted. Radioactive contamination of water has not been detected in the leak detection system of these ponds or the collection trench. Conclusively, ponds 8 and 9 are not contributing to groundwater contamination. Consequently, deposition of solids derived from treatment of groundwater into ponds 8 and 9 will not affect the radioactive concentrations in the groundwater at Fansteel.

Although the Plan describes use of the evaporation process, it also contemplates that the evaporation process may not be used at all times. In such event, collected groundwater would necessarily require treatment without evaporation. The groundwater from the collection trench will be processed consistent with historic practice; i.e. the same as the groundwater collected by the French drain around Pond 3. Eliminating the use of the evaporation process will provide necessary flexibility in management of groundwater and substantially reduce operating costs, as well.

The proposed revised text of Section 2.1.2.8.2 of the Decommissioning Plan is attached. The proposed revision allows use of either the wastewater treatment system, the evaporation process, or both.

Please contact me if you have questions.

Sincerely,



Fred Dohmann
General Manager

FD/la

Attachments

Copy to: Michael J. Mocniak

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maintained at all times. Materials packaged for off-site disposition as radioactive materials may be accumulated on the site until suitable facilities are available.

2.1.2.8.2 Remediate Site Groundwater

Fansteel notes that groundwater remediation activities and discussions contained in this DP are included only to provide a comprehensive overview of remediation activities at the Fansteel site. Costs for the groundwater collection and treatment system are associated with commercial operations and are not part of the DFP.

Design information and process evaluations were presented in the remediation Feasibility Study included in the 1994 DP. Subsequent to submission of the 1994 DP, the groundwater remediation design was modified and groundwater remediation activities were initiated upon approval of Fansteel's 1995 license renewal application.

The groundwater remediation strategy consists of a collection trench around the downgradient perimeter of the site as shown in Figure 5. This trench intercepts and collects groundwater and routes it to a treatment facility. Treatment consists of a neutralization/flocculation by lime addition, i.e. the facility wastewater treatment system. This treatment may be preceded or superceded by an evaporation process that reduces the collected groundwater to a high solids slurry. In either case, the solids will be managed as a feedstock for operation of the facility.

Groundwater remediation activities will continue until it is determined that the groundwater is not impacted by licensed materials above 30 pCi/l for natural uranium and 15 pCi/l for thorium for a period of at least 24 months.

2.1.2.8.3 Treatment of Decontamination Wastewater

Fansteel intends to use the process plant WWTP to remove solids from liquid effluents generated during decommissioning activities prior to discharge. Once this treatment facility is shut down to be decommissioned, additional liquid effluents will be routed to the evaporation process. Solid materials generated by this process will, if necessary, be disposed at an approved low-level radioactive disposal facility. Both of these activities are consistent with ALARA measures required by 10 CFR 20.1101.