



May 25, 2001

Mr. Mike McCann
U.S. Nuclear Regulatory Commission
Region III
801 Warrenville Rd.
Lisle, Illinois 60532

**Re: Progress Report – January Through April 2001
Former Michigan Chemical Company Low Level Radioactive Disposal Site
Breckenridge, Michigan**

Dear Mr. McCann:

This correspondence is submitted on behalf of NWI Land Management (NWI) pursuant to the June 11, 1999 and February 22, 2000 correspondence from NWI regarding the former Michigan Chemical Company low level radioactive disposal site in Breckenridge, Michigan (Site or Breckenridge Disposal Site). The June 11, 1999 correspondence proposed phases of activities to be performed to bring this site to an acceptable closure, and indicated that periodic progress reports would be submitted describing the activities performed during the reporting period. In the February 22, 2000 correspondence, NWI proposed to perform a preliminary dose assessment, additional characterization activities and a revised dose assessment (considering the additional characterization data).

The Preliminary Dose Assessment (PDA) for the Breckenridge Disposal Site was completed in May 2000. A Work Plan that proposed additional characterization activities and incorporated the PDA was submitted on July 14, 2000.

At an October 3, 2000 meeting, the NRC indicated that guidance was being prepared by the NRC Headquarters Office which would clarify the regulatory criteria applicable to sites such as the Breckenridge Disposal Site. The NRC also indicated that the guidance was anticipated to be finalized prior to the spring of 2001. Since the guidance may affect the activities at the Site, it was agreed that NWI would not proceed with the implementation of the Work Plan until the guidance was finalized. To minimize the time necessary to agree upon a Work Plan once the guidance was finalized, it was further agreed that the NRC would provide written comments to NWI regarding the current Work Plan, and NWI would attempt to address those comments while the guidance was being finalized.

The NRC Headquarters Office has not released the guidance for public review to date, and we understand that the overall schedule to finalize the guidance has been significantly delayed. Also, the NRC's comments regarding the Work Plan have not yet been finalized. The NRC has

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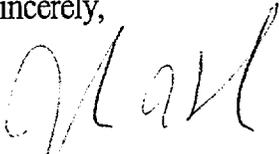
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indicated that interim approaches for sites such as the Breckenridge Disposal Site are being considered, and that a status update meeting may be appropriate. NWI continues to share the NRC's desire to develop a consistent approach for this Site. Please inform us when the NRC would like to schedule a meeting to discuss the Site.

If you have any questions regarding this matter, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "John Hock".

John Hock, P.E.

Environmental Project Manager

cc: Bruce Jorgensen, NRC
Mike Prattke
George Harvell
Ken Kasper, NES