



April 27, 2001

U.S. Nuclear Regulatory Commission
Mr. Theodore Smith
Mailstop T-7F27
Two White Flint North
11545 Rockville Pike
Rockville, MD 20852-2738

**SUBJECT: REVERE, PENNSYLVANIA SITE
AREA OF SLAG AREAS**

Dear Mr. Smith,

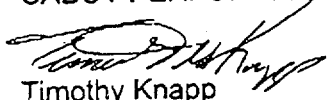
in response to questions raised by the NRC during the recent site visit, I am providing additional information to assist with your evaluation of the Revere, Pennsylvania site.

While evaluating the volume of waste material, we reviewed the reported surface area of each slag disposal area. It appears that some of the surface areas presented in the 1994 NES Radiological Subsurface Sampling Report (used for the 2001 dose calculations) are inconsistent with the affected area reported in the 1994 Enserch report. Table 1 (attached) shows a comparison between the NES and Enserch reports of the surface area and corresponding estimated volume for each area. The Enserch work was conducted during, and subsequent to, the remediation effort. The differences are possibly due to piling up or spreading out of the waste material during the remediation effort. To provide for a conservative dose estimate, we recommend using the smaller surface area reported for each area for the volume calculations.

As shown in Table 1, using the minimum volumes for each area results in a reduction in volume from ~818,000 ft³ to 536,000 ft³, a reduction of 35%. This reduction in volume would result in approximately a 50% increase in the source term concentration and calculated dose. This modest increase in the calculated dose would not impact the conclusions reached in the Dose Assessment (STEP, 2001). The low calculated dose would still be approximately one order of magnitude less than the 25-mrem/year limit for unrestricted release. Cabot recommends that the NRC use the adjusted volume presented here for their evaluation of the site.

I hope this letter resolves all remaining issues. If you have any questions please do not hesitate to contact me.

Yours truly,
CABOT PERFORMANCE MATERIALS


Timothy Knapp
Radiation Safety Officer

Enclosure

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TABLE 1
 VOLUME CALCULATIONS
 Revere, Pennsylvania Site
 April 2001

AREA IDENTIFICATION	Depth	ENSERCH AREA	ENSERCH VOLUME	NES AREA	NES VOLUME	MINIMUM AREA	MINIMUM VOLUME
Old Pit	9	34,450	310,050	54,900	494,100	34,450	310,050
Container Storage	4	43,060	172,240	19,900	79,600	19,900	79,600
Parking	6	19,370	116,220	35,500	213,000	19,370	116,220
Building 4&5	2	15,070	30,140	16,000	32,000	15,070	30,140
Total		111,950	628,650	126,300	818,700	88,790	536,010
Percent Reduction in Volume NES to Minimum							35%