

March 8, 2002

Attention: Document Control Desk
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852

Ref: Docket No. 40-6563; License No. STB-401
Mallinckrodt, Inc., C-T Phase 1 Plan Revision

Attention: Document Control Desk

Mallinckrodt Inc submits 4 copies of revision pages 1-8, 3-9 (a), and 3-15 to the C-T Phase 1 Plan, dated January 09, 2002.

If you have any question about this submission, please contact me at (314) 654-1344.

Sincerely,



Mark Puett
Manager of Health, Safety, and Environmental

Xc: John Buckley, Project Manager (1 Copy)
Low Level Waste and Decommissioning Projects Branch
Division Waste Management
Office of Nuclear Material Safety and Safeguards
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east side of Broadway Street, immediately west of Plant 5. At that time, this area was designated as Plant 4. This designation is no longer used for this area. The company was the sole supplier of uranium compounds for the Manhattan project well into 1943, and provided high purity uranium products for the duration of the war.

In 1945, the Destrehan Plant (Plants 6, 6E, and 7 north and south of Destrehan Street) was built to process pitchblende ore and to increase the capacity of the refinery. Plant 6 production began in 1946. In 1950 and 1951, the MED-AEC facilities in Plants 1 and 2 were partially decommissioned and finally decommissioned in the early 1960s. In 1958, the Destrehan plant was put on standby, and uranium processing was transferred to the MCW Weldon Spring Plant. In 1960 and 1961, the MED-AEC facilities in the former Plant 4 area (part of the area now known as Plant 10) and the Destrehan Plant were decommissioned.

Figure 1-8 illustrates the areas at the St. Louis Plant site that were used for MED-AEC production. The St. Louis Plant processed approximately 50,000 tons of uranium products during the 1942-1958 MED-AEC operations. Based upon the estimated 50,000 tons of uranium products produced from the ore concentrates and pitchblende ore, it is estimated that the minimum radioactivity throughput was approximately 30,000 Ci of uranium isotopes and 10 Ci of thorium isotopes.

DOE, under FUSRAP, had responsibility for remediating radioactive and chemical contamination in the areas of the St. Louis Plant that formerly housed MED-AEC operations. However, the U.S. Army Corps of Engineers (USACE) now has responsibility for these activities because in October, 1997, Congress transferred responsibility for FUSRAP implementation from DOE to USACE. FUSRAP was created to identify and control or remediate sites where residual radioactivity remains from activities conducted under contract to MED and AEC during the early years of the nation's atomic energy program. Some facilities that produced radioactive materials for commercial sale are also included under FUSRAP at the direction of Congress. The USACE is responsible for the cleanup of both radioactive and hazardous chemical contamination at the St. Louis Plant with oversight by the U. S. Environmental Protection Agency (EPA). These responsibilities are outlined in a Federal Facilities Agreement (FFA) negotiated by EPA Region VII and DOE in June of 1990 (Docket No. VII-90-F-0005). The Federal Law has been amended to transfer these responsibilities to USACE. The FFA further defines the conditions dictated by EPA to manage remediation at St. Louis. The document creates broad obligations for clean up of all residual waste from uranium processing, including such waste that might have mixed or commingled with other hazardous material substance at the site.

Buildings 50, 51, 51A, 52, 52A, 100, 116, 117, 219, 700, 704, 705, 706, 707, and 708, previously located as illustrated in Figure 1-9 were demolished by the DOE under FUSRAP. Before Building 250 was constructed, C-T laboratories were located in Building 25. It was also used as a laboratory to support MED-AEC operations. Some Plant 6 and 7 buildings and adjacent open areas were used to support C-T manufacturing following their decontamination and release to Mallinckrodt by the AEC in the early

All contaminated liquids will be disposed to the Metropolitan St. Louis Sewer District (MSD) following confirmation that MSD specifications for sampling, analysis, and pre-treatment have been met.

3.6.6 Mixed Waste

Characterization efforts performed to date have not identified any mixed wastes. Mallinckrodt does not anticipate that mixed waste will result from decommissioning efforts. If mixed waste were discovered, Mallinckrodt has a permit to manage hazardous waste on-site in accordance with a RCRA Part B permit with the State of Missouri. In the event mixed waste is identified during remediation activities, Mallinckrodt will characterize the wastes, identify a disposal method, assess the effect on the schedule, assess related disposal costs, modify handling procedures, as needed, and will notify the NRC and the MDNR.

3.6.7 Records

Mallinckrodt will maintain records of waste material released from the C-T decommissioning area or controlled areas. The Administrative Controls Plan presents the record retention requirements in Attachment 2.