

From: "Joe harverson" <harversonj@alaron-nuclear.com>
To: <EXU@nrc.gov>
Date: Tue, Aug 13, 2002 8:46 AM
Subject: application re: 700 g

Thanks for getting back to me, please hold that particular application in abeyance, we will revise the amendment application to address your comments and request an unlimited gram amount based on concentrations remaining below a certain limit (the same as envirocare has). The concentration of the waste we are dewatering is drarically reduced from the incoming due to the addition of drying agents and absorbents.

Thanks

Joe Harverson

>>> "Elizabeth Ullrich" <EXU@nrc.gov> 08/13/02 07:53AM >>>
Joe,

My apologies for not getting back to you yesterday. It is looking as though this issue will likely require referral. The application confused me, though, in referring to several different concentrations. Is it 2 nCi/g or 10 pCi/g or 250 pCi/g? Does the concentration change after your treatment of the waste?...I rather guess so, as you are dewatering the material...how does this affect the concentration? The concentration of the material may be important, and there is no explanation in your application as to why you believe there is no credible criticality problem.

Also, if you have more than one type of SNM material (70.24) on your license, the criticality limits apply at 450 grams, not 700 g (... "450 grams of any combination thereof). Your license currently has 10 g any Pu.

Your application table appears to combine the SNM into the current item A of you license (currently it is any BPM and any source). We would continue to maintain the SNM as a separate line item on your license, and not combine it into item A.

Betsy

From: Elizabeth Ullrich
To: Harverson@alaron-nuclear.com
Date: Tue, Aug 13, 2002 7:53 AM
Subject: application re: 700 g

Joe,

My apologies for not getting back to you yesterday. It is looking as though this issue will likely require referral. The application confused me, though, in referring to several different concentrations. Is it 2 nCi/g or 10 pCi/g or 250 pCi/g? Does the concentration change after your treatment of the waste?...I rather guess so, as you are dewatering the material...how does this affect the concentration? The concentration of the material may be important, and there is no explanation in your application as to why you believe there is no credible criticality problem.

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Betsy

CC: John Kinneman

From: Elizabeth Ullrich
To: Joe harverson
Date: Tue, Aug 13, 2002 8:59 AM
Subject: application re: 700 g

Okay, not a problem. If you want these questions more formally in a letter, I will get one out today. Otherwise, I will sit tight and wait for your answer.

Also, re: "unlimited amount" - you might have to adjust your DFP and FA if you ask for unlimited. Look at the constraints of your current DFP and discuss either a) why you don't need to change your DFP or b) that you do and will provide an amended DFP and FA instrument...

Betsy

>>> "Joe harverson" <harversonj@alaron-nuclear.com> 08/13/02 08:46AM >>>

Thanks for getting back to me, please hold that particular application in abeyance, we will revise the amendment application to address your comments and request an unlimited gram amount based on concentrations remaining below a certain limit (the same as envirocare has). The concentration of the waste we are dewatering is drastically reduced from the incoming due to the addition of drying agents and absorbents.

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Joe Harverson

>>> "Elizabeth Ullrich" <EXU@nrc.gov> 08/13/02 07:53AM >>>

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Your application table appears to combine the SNM into the current item A of your license (currently it is any BPM and any source). We would continue to maintain the SNM as a separate line item on your license, and not combine it into item A.

Betsy

CC: John Kinneman