CABOT

Performance Materials

September 27, 2002

U. S. Nuclear Regulatory Commission
Fuel Cycle Facilities Branch
Division of Fuel Cycle Safety and Safeguards
Office of Nuclear Material Safety and Safeguards

Docket No. 40-6940
License No. SMB-920

RE: RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

Dear Ms. Brummett:

Cabot Performance Materials (CPM) received by letter dated June 25, 2002 a request for additional information for the renewal of CPM's Source Material License SMB-920. In section 3 "Environmental Monitoring Program" of this letter the NRC requested updated information on Forage Crop Sampling. This sampling requirement was removed as a license requirement by the Commission in 1996. Specifically by letter dated August 29, 1996 the NRC notified the Regional Manager of PADEP Air Quality Program of its intent to remove this requirement based on the fact that:

> "neither the federal nor state government has determined that fluoride in forage crops is a sufficiently important health issue to establish health-based regulations or other standards limiting its concentration in cattle feed."

Although Forage Crop Sampling is not performed at the facility CPM is required to perform perimeter monitoring for ambient air fluorides per Pennsylvania Code Title 25 Section 131.3. The limit set forth in this requirement is five micrograms per cubic meter. The attached chart is a summary of this data for the time period January, 1999 through June, 2002. During this period CPM has been operating within the regulatory limits and intends to continually improve processes and technologies to maintain this trend.

Given this information it is CPM's intent not to include Forage Crop Sampling in the response to the RAI. I am available to discuss this further at your convenience.

Best Regards,
Cabot Performance Materials

Timothy M. Knapp
Radiation Safety Officer

encl.

cc: Brad Okoniewski, Cabot
R. Schoenfelder, Weston

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

August 29, 1996

Ms. Francine Carlini, Manager
Air Quality Program
Pennsylvania Department of Environmental Protection
Southeast Regional Office
Lee Park Suite 6010
55 North Lane
Conshohocken, PA 19428

SUBJECT: FLUORIDE IN VEGETATION NEAR CABOT PERFORMANCE MATERIALS, BOYERTOWN, PENNSYLVANIA (TAC NO. L10014)

Dear Ms. Carlini:

This letter is to inform the Department of Envionmental Protection of the U. S. Nuclear Regulatory Commission's evaluation and conclusions concerning the renewal of an NRC source material license for Cabot Performance Materials (CPM) in Boyertown, Pennsylvania. As discussed by telephone with Mr. Jim Rebarchak of your staff, NRC has prepared an Environmental Assessment (EA) of the license renewal, in accordance with NRC's regulations in 10 CFR Part 51 implementing Section 102(2) of the National Environmental Policy Act, and plans to publish a finding of no significant impact (FONSI) for the license renewal.

During the environmental review in preparation for the EA and FONSI, it was noted that CPM monitors fluoride content in forage crops adjacent to the Boyertown facility, and that the fluoride content in the grass and corn crops has exceeded a reporting action level of 40 parts per million established in their current license. This action level was selected based upon research performed in the 1960s that reported observable effects in the bones and teeth of dairy cattle from forage having 40 ppm or higher seasonal average of fluoride. Data from CPM's forage monitoring program indicates that fluoride concentrations have exceeded this reporting action level in grass in 1988, 1991, 1992, and 1993, and in corn in all years 1988 through 1993. Because exceedences of the reporting action level are, by license condition, required to be reported by CPM to PADEP and to the NRC, we understand that these data have been reported to PADEP periodically.

As stated above, NRC plans to renew CPM's license to possess and use source material and to issue a FONSI for this action. The basis for this finding with respect to fluoride is that neither the federal nor state government has determined that fluoride in forage crops is a sufficiently important health

issue to establish health-based regulations or other standards limiting its concentration in cattle feed. Accordingly, our intent is to delete the requirement in CPM's license to monitor for fluoride in forage crops.

If you need further information concerning this matter, please call Mary Adams of my staff at 301-415-8111.

Sincerely,

Robert C. Pierson, Chief
Licensing Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS

Docket 40-6940
License SMB-920

cc: Mr. Kevin L. Holsopple
Radiation Safety Officer
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