

From: "Brian Clayman" <bclayman@envirocareutah.com>
To: <teh@nrc.gov>
Date: 11/12/02 3:52PM
Subject: SNM Exemption

Hello Tim,

Per our discussion, we request specific language for sample frequency:

The sample collection frequency for radiological analysis is:
One sample for each of the first ten shipments (rail or highway); or one sample for each of the first 100 yds³ up to 1,000 yds³, thereafter, one sample for each additional 500 yds³ following the first ten shipments; or following the first 1,000 yds³

This language has remain unchanged from 1998 to present.

In addition, condition 5 states that Envirocare must wait until post-processed waste radiological samples are analyzed before returning the waste to temporary storage.

Our operation is such that once post-processed samples are taken, waste is returned to our storage pad while the analysis results are pending from off-site laboratories. The way condition 5 is worded can be interpreted that we must leave the waste at the treatment facility until results are returned and this would prohibit further use of the treatment facility. Could the condition be re-worded to state that waste will not be disposed until post-processing verification results are returned? This would allow Envirocare to store the processed waste while awaiting sample results and still continue to process waste. The risk would still be averted in that waste will be prevented from further management until verification results can be reviewed.

Thank you,

Brian Clayman
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CC: "Tye Rogers" <trogers@envirocareutah.com>