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REGION 1

July 9, 2003
GEW03-002

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SMB-1541
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Mr. Craig Gordon
Nuclear Regulatory Commission
U.S. NRC Region I
475 Allendale Road
King of Prussia, PA 19406-1415

Dear Mr. Gordon;

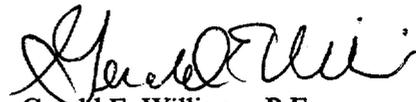
As we discussed, Heritage Minerals is requesting approval of a modified sampling and analysis procedure for rubber coated materials that are being encountered during the decommissioning and demolition of the Wet and Dry Mill buildings. Certain equipment components such as mixer blades, launder troughs, and mixer motor shafts were covered with a thick rubber product that is adhered to the underlying steel. To date, we have been unable to remove the rubber from the steel. This product has minor bits of minerals embedded in the surface causing these components to fail the surface scanning release criteria. If it cannot be removed, the entire component including the underlying steel must also be discarded as impacted waste. This will be very costly, and will effectively force the disposal of a significant quantity of clean steel as impacted waste.

We are proposing that these materials be evaluated as follows for release:

- Contact and 1-meter micro-R values will be collected and compared to general area micro-R values. Components with micro-R values less than 5 micro-R above general area values will be acceptable for release.
- Supplemental sampling and analysis of the product will be completed to verify that the average material concentration is less than 10 pCi/g total thorium and total uranium.

We propose that components meeting these two criteria be acceptable for unrestricted release and material recycling, and that they be exempted from the surface release criteria associated with NRC license SMB-1541. Since we anticipate that the remaining wet and dry mill components will be cleaned and processed shortly, your prompt attention to our request would be greatly appreciated. I will be meeting with Heritage Minerals on Tuesday, July 15. I would like to discuss this with you prior to that meeting so that we can continue planning for the project activities.

Sincerely,


Gerald E. Williams, P.E.
Senior Project Manager

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NMSS/RGNI MATERIALS-002