

Kaiser Aluminum
Corporate Environmental Affairs

September 15, 2003

Mr. John Buckley
Nuclear Regulatory Commission
TWFN, 7F27
Washington, DC 20555-0001

Re: Kaiser Tulsa Decommissioning

Dear Mr. Buckley:

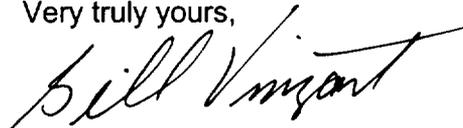
Kaiser's approved Decommission Plan (DP) specifies that material with net thorium-232 activity concentrations greater than 31.1 pCi/g will be segregated and disposed off site. On average, the material above the 31.1 pCi/g criterion meets the definition of exempt material in 10 CFR 40.13 because it is less than 0.05% by weight source material.

Several RCRA-permitted landfills are allowed to accept exempt material under their permits. In order to meet the waste acceptance criteria (WAC) for these facilities Kaiser will be required to control the concentration of thorium in each container shipped. During segregation we anticipate a portion of the excavated material may exceed WAC requirements. Kaiser will need to blend material that exceeds WAC requirements with additional excavated material on site to meet WAC. We understand that such blending is acceptable if necessary to meet WAC, but not for the purpose of avoiding offsite disposal.

Please confirm that Kaiser will be allowed to blend excavated material to meet WAC of disposal facilities. Kaiser does not intend to blend material in order to avoid offsite disposal.

If you have any questions concerning this matter, please call me at 225/231-5116.

Very truly yours,



J. W. (Bill) Vinzant, P.E.
Manager, Corporate Environmental Affairs

JWV/shh

cc: File – Tulsa 3.12.22