

December 23, 2003

Ms. Juanita Bursely
Manager, Environmental Protection
UCAR Carbon Company, Inc.
12900 Snow Road
Parma, OH 44130

SUBJECT: OCTOBER 6-10, 2004 IN-PROCESS INSPECTION OF UCAR CARBON
COMPANY, INC

Dear Ms. Bursely,

I am writing you in regard to the inspection we conducted at the UCAR Carbon Company facility in Lawrenceburg, TN, during the week of October 6, 2003. This inspection was conducted at your request to expedite release of the UCAR site. Personnel from the Oak Ridge Institute for Science and Education (ORISE), accompanied by a U.S. Nuclear Regulatory Commission (NRC) Regional Inspector, performed an in-process inspection, anticipating that the results of this inspection could be used as the staff's confirmatory survey. Section 2.1.1 (Task 11) of your Decommissioning Plan (DP) stated that a final radiological status survey would be performed following guidance from NUREG-5849. This same guidance was used in the conduct of NRC's survey. The inspectors performed surveys of the site for fixed contamination, obtained smears for removable contamination, obtained soil samples, and observed contractor personnel performing surveys. In addition, cognizant contractor personnel were interviewed concerning the remediation and survey methods.

The results of this inspection are contained in the enclosure to this letter. These results demonstrate that there is residual contamination above release limits. This survey did not address groundwater, sewer system, or holding ponds, and only a small area of the outside grounds was addressed. As this was not an exhaustive survey, additional areas of the site may also exceed release limits.

Your DP and our review of that plan was based on your radiological characterization report dated August 15, 1998, which was used to define the areas that would be remediated. However, this inspection demonstrated that there is residual contamination in areas other than those identified during the characterization survey. In addition, we found residual contamination in areas that were reported to be clean as well as in areas that were characterized as unaffected.

Section 2.1 of your DP states that the two primary objectives of the remediation of the UCAR facility are to reduce residual contamination of building surfaces to below the criteria identified in NRC's "Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use or Termination of Licenses for Byproduct, Source, or Special Nuclear Material", and to reduce residual soil contamination concentrations to current unrestricted

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release criteria identified in NRC's final rule (10 CFR 20 Subpart E) "Radiological Criteria for License Termination. The NRC does not intend to accept the decommissioning of this facility until you have provided a final status survey, demonstrating achievement of these goals, and we have conducted a confirmatory survey. We will schedule a confirmatory survey once you have provided a final status survey demonstrating achievement of these goals.

To ensure that there are no misunderstandings, we will schedule, in the near term, a meeting with you to discuss the inspection results and NRC expectations for the completion of decommissioning of this site. If you have any questions on this matter, please contact me at 301-415-6664 or klk@nrc.gov. "

Thank you,

/RA/
Ken Kalman

Enclosure:

(Results of Survey) ORISE Report dated, November 17, 2003

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/RA/
Ken Kalman

Enclosure:
(Results of Survey) ORISE Report dated, November 17, 2003

Distribution: DCB r/f D. Schmidt O. Masnyk Bailey CBurkhalter

ADAMS ACCESSION NUMBER: **ML033580058**

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Concurrence

*See Previous

OFFICE	DCB*	DCB*	RII*	OGC*	DCB*
NAME	K.Kalman	G. Smith	T.Decker	J.Lieberman	D.Gillen
DATE	12/17/2003	12/23/2003	12/19/2003	12/17/2003	12/23/2003

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