



Weston Solutions, Inc.
6565 Americas Parkway NE
Suite 200
Albuquerque, New Mexico 87110
505-837-6520 Fax 505-837-6550
www.westonsolutions.com

March 23, 2004

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

Re: Submittal of Final Revised Application for Renewal of License SMB-920 dated 23
March 2004. Docket No. 40-6940

Dear Elaine:

This letter and the attached documents provide the final application for renewal of license SMB-920 for Cabot Supermetals, Inc. (CSM). This application and the associated documents, appendices, and attachments are updated and revised versions of documents that have been previously submitted over the past two years. This submittal is meant to supersede and replace all prior submittals, and consists of the following documents:

1. A copy of NRC Form 313 completed for License SMB-920, sign on February 6, 2004 by Tom Odle, Vice President as the Certifying Officer.
2. Supplemental Information For Renewal Application for License Number SMB-920, prepared by Weston Solutions, Inc and dated March 23, 2004
3. Appendix A: Review of the Occupational Air Sampling Program at the Cabot Supermetals, Incorporated Boyertown, Pennsylvania Plant, June 9, 2003
4. Appendix B: Review of the Bioassay Program at the Cabot Supermetals, Incorporated Boyertown, Pennsylvania Plant, June 9, 2003
5. Appendix C: Species Impact Review Letters
6. Appendix D: Letters Justifying Termination of Forage Crop Sampling
7. Appendix E: Technical Basis for the Location and Screen Interval of Groundwater Monitor Wells at Cabot Performance Materials Corporation Boyertown, Pennsylvania Plant, August 9, 2002
8. Appendix F: Hydrology Figures
9. Appendix G: Dose Assessment for Disposal of Wastewater Treatment Sludge from the Cabot Supermetals Facility in Boyertown, Pennsylvania, April 22 2003
10. Appendix H: Cabot Supermetals, Inc. 2004 Decommissioning Cost Estimate for the Boyertown, Pennsylvania Site, March 11, 2004
11. Attachment 4 to Appendix H; Tables for the DFP Cost Estimate.
12. Attachment 5 to Appendix H: The ALARA Analysis for the DFP Cost Estimate.
13. Proposed License Conditions for the Renewal of License SMB-920, dated March 23, 2004.

These revised documents have incorporated material and information provided in response to the NRC's Request for Additional Information (RAI) dated 14 January 2003. A brief summary of the principal modifications is provided below:

- The Decommissioning Funding Plan Cost Estimate (Appendix H) was modified to include tables of information in Attachment 4 that break out the bases for cost calculations as recommended in Draft Regulatory Guide DG-3014, June 1999 and to provide additional information in response to specific questions in the RAI.
- The document provided with NRC form 313 has been expanded to include the environmental assessment data, including meteorology, climate, site hydrology, environmental impacts, vegetation, threatened and endangered species, land use, cultural resources, and water resources.
- The section on Waste Management directly addresses CSM's preferred disposal method for each waste stream and describes other acceptable disposal options.
- Two documents that evaluate the Occupational Air Monitoring Program and Bioassay Program were revised to address questions asked by the NRC reviewers in the RAI.
- A dose assessment was developed (Appendix G) that supports the release limit that applies to the wastewater filtercake as described in the license condition 20.
- Appendix E that is an evaluation conducted by Environmental Standards, Inc. of the groundwater conditions with suggestions for minor revisions to the selection and placement of the monitoring wells.

Cabot Supermetals is prepared to quickly establish the financial assurance mechanism for the amount justified in Appendix H upon notification that the NRC accepts that cost estimate. That should be the last detail required to complete this license renewal application. Please contact me at (505) 837-6556 if you have any questions regarding this information, and thank you for your assistance in the preliminary review and development stages of this process.

Sincerely,
Weston Solutions, Inc.



Robert P. Schoenfelder, CHP
Project Manager

RPS/cmb

cc: Timothy Knapp, Cabot Supermetals