

Letter of Transmittal



359 North Gate Drive • Warrendale, Pennsylvania 15086 • Phone: (724) 934-3530 • Fax (724) 934-3533

Date: April 22, 2004 **Project No.:** 4000-PA4072-02 40-2377
To: Mr. John T. Buckley
U.S. Nuclear Regulatory Commission
TWEN, 7F27
Washington, DC 20555
Re: Kaiser Tulsa Site
Thorium Remediation Project

We are sending you the following item(s):

Quantity	Date	No.	Description
1	April, 2004		US Ecology Transportation Work Plan
1	April, 2004		Revision 01, RECON Radiation Health and Safety Plan
1	April 2004		Revision 01, RECON Procedures REC-WP-4-02, REC-WP-2-09

These are transmitted as checked below:

- For your use Enclosed
 As Requested Under Separate Cover via: _____
 Return of requested material
 Other: For your information.

Remarks: On behalf of Kaiser Aluminum & Chemical Corporation, this approved Transportation Work Plan and Revision 01, RECON Radiation Health and Safety Plan (RHASP) are forwarded per the requirements of the approved Decommissioning Plan and Addendum for the Thorium Remediation Project. Please destroy all previous versions of the RECON RHASP and Revision 01, RECON Procedures REC-WP-4-02, REC-WP-2-09. In the coming days, the Conveyor Mounted Radiation System Work Plan will follow.

Copy to: Distribution (see attached) **Signed:** Chuck Beatty

If enclosures are not as noted, please notify our office immediately.

NMSSD1

Kaiser Plan and Procedure Distribution

<p>Mr. John T. Buckley US Nuclear Regulatory Commission TWFN, 7F27 Washington, DC 20555</p>	<p>Mr. S Paul Handa Kaiser Aluminum & Chemical Corporation 7311 East 41st Street Tulsa, OK 74145</p>
<p>US Nuclear Regulatory Commission Document Control Desk Washington, DC 20555-0001</p>	<p>Diana Brown RECON 7311 East 41st Street Tulsa, OK 74145</p>
<p>Mr. Dwight D. Chamberland Director US Nuclear Regulatory Commission Region IV 611 Ryan Plaza Drive Arlington, TX 76011-8064</p>	<p>J.W. (Bill) Vinzant, P.E. Regional Environmental Manager Kaiser Aluminum & Chemical Corporation Corporate Environmental Affairs 9141 Interline Avenue, Suite 1A Baton Rouge, LA 70809-1957</p>
<p>Ms Pamela L. Bishop Sr. Environmental Specialist State of Oklahoma Department of Environmental Quality 707 N. Robinson PO Box 1677 Oklahoma City, OK 73102 (Fed-ex Zip) 73107 (PO Box Zip)</p>	<p>Dr. L Max Scott Louisiana State University Nuclear Science Center East Fraternity Circle Baton Rouge, LA 70803</p>
<p>Ms. Kelly Hunter Burch State of Oklahoma Office of Attorney General 4545 N. Lincoln Boulevard Suite 260 Oklahoma City, OK 73105</p>	<p>Alvin G. Gutterman Attorney at Law Morgan, Lewis & Bockius LLP 1111 Pennsylvania Avenue, NW Washington, DC 20004</p>
<p>Mr. Scott Van Loo City of Tulsa 4818 South Ellwood Avenue Tulsa, OK 74107</p>	<p>Tre Fischer Kaiser Aluminum & Chemical Corporation 5847 San Felipe, #2600 Houston, TX 77057</p>
<p>Ms. Roberta Fowlkes CCF Associates, LLC 20 Pinnacle Drive Charleston, WV 25311</p>	<p>Danny Brown RECON 9720 Derrington Houston, Texas 77064</p>



Remedial Construction Services, L.P.
Thorium Remediation Project
7311 E. 41st Street
Tulsa, Oklahoma 74145
tel 918-828-2419
fax 918-828-2421
sales@recon-net.com
www.recon-net.com

April 06th, 2004

J. W. (Bill) Vinzant, P.E.
Kaiser Aluminum & Chemical Corp.
9141 Interline Ave, Suite 1A
Baton Rouge, LA 70809-1957

Re: Procedures Revisions

Mr. Vinzant,

Remedial Construction Services, L.P. (RECON) is submitting Revision 01 for Procedure REC-WP-4-02 and Revision 01 for Procedure REC-WP-2-09. Please remove previously submitted procedures from RECON's Work Plan and Procedures Manual and insert the attached revised procedures as follows in Section 16 replace (REC-WP-2-09) and in Section 23 replace (REC-WP-4-02). I have also included the revised Procedure Numbers and Descriptions page to be removed from and inserted in Section 4 of RECON's Work Plan and Procedures Manual. If you have any questions and or concerns please feel free to call.

Sincerely,

A handwritten signature in black ink, appearing to read "Diana L. Brown". The signature is fluid and cursive, with the first name "Diana" being more prominent.

Diana L. Brown
RECON
Project Administrator

Cc: Chuck Beatty – Penn E & R

Attachments:

Procedure Numbers and Descriptions Table of Contents
Revised Procedure REC-WP-2-09
Revised Procedure REC-WP-4-02



Procedure Numbers and Descriptions

Thorium Remediation Project

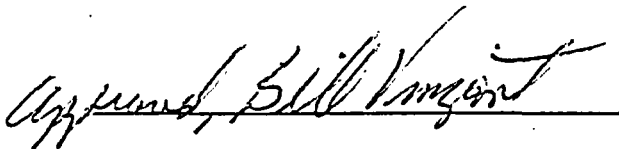
Section	Procedure No.	Title	Effective Date	Revision No.
5	REC-WP-1-01	PROCEDURES	March 2004	00
6	REC-WP-1-02	CHANGES TO PROCEDURES	March 2004	00
7	REC-WP-1-03	COMPLETION OF FORMS	March 2004	00
8	REC-WP-2-01	BASIC INSTRUMENT OPERATION	March 2004	00
9	REC-WP-2-02	INSTRUMENT MDC CALCULATION	March 2004	00
10	REC-WP-2-03	LUDLUM MODEL 2224 w/ 43-93	March 2004	00
11	REC-WP-2-04	LUDLUM MODEL 3 w/ 44-9	March 2004	00
12	REC-WP-2-05	LUDLUM MODEL 19	March 2004	00
13	REC-WP-2-06	LUDLUM MODEL 177 w/ 44-9	March 2004	00
14	REC-WP-2-07	LUDLUM MODEL 2929 w/ 43-10-1	March 2004	00
15	REC-WP-2-08	LUDLUM MODEL 2221 w/43-5	March 2004	00
16	REC-WP-2-09	DOSIMETER ISSUANCE/TRACKING	April 2004	01
17	REC-WP-3-01	GROSS GAMMA SURVEY	March 2004	00
18	REC-WP-3-02	PERSONNEL RADIATION SURVEY	March 2004	00
19	REC-WP-3-03	ENTRY/UNRESTRICTED RELEASE	March 2004	00
20	REC-WP-3-04	EXPOSURE RATE SURVEY	March 2004	00
21	REC-WP-3-05	REMOVEABLE ALPHA BETA/GAMMA SURVEY	March 2004	00
22	REC-WP-4-01	SURFACE SOIL SAMPLING	March 2004	00
23	REC-WP-4-02	AIR SAMPLING PROCEDURE	April 2004	01
24	REC-WP-4-03	STORAGE TANK WATER SAMPLING	March 2004	00
25	REC-WP-5-01	CHECK SOURCE ACCOUNTABILITY	March 2004	00
26	REC-WP-6-01	CHAIN OF CUSTODY	March 2004	00
27	REC-WP-7-01	DISCHARGE WATER FROM HOLDING TANK	March 2004	00
28	REC-WP-7-02	EXCAVATION	March 2004	00
29	REC-WP-7-03	BACKFILL	March 2004	00
30	REC-WP-7-04	LOADING VIBRATING SCREEN	March 2004	00
31	REC-WP-7-05	LOADING RAIL CARS	March 2004	00

PROCEDURE: REC-WP-2-09

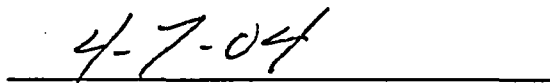
Dosimeter Issuance and Tracking
Thorium Remediation Project
Tulsa, Oklahoma

REVISION: 01

EFFECTIVE DATE: APRIL 2004



J. W. (Bill) Vinzant:
Kaiser Aluminum & Chemical Corporation



Date:

Work Plan Procedures Manual

Remedial Construction Services, L.P. (Recon)
9720 Derrington
Houston, TX 77064
(281) 955-2442

Procedure: REC-WP-2-09

Title: RADIATION BADGE ISSUANCE

Purpose

The purpose of this procedure is to provide instruction for the issuance and tracking of radiation badges.

1.0 DEFINITIONS

NA

2.0 PREREQUISITES/PRECAUTIONS/LIMITATIONS

- 2.1 Personnel will have successfully completed Radiation Health and Safety Plan (RHASP) training requirements.
- 2.2 Personnel shall have completed Cumulative Occupational Dose History, U.S. Nuclear Regulatory Commission (NRC) Form 4.
- 2.3 Personnel shall not knowingly take dosimeter off site.
- 2.4 Personnel shall notify the Recon Radiation Safety Officer when they have undergone medical procedures involving radioactive materials or procedures involving the use of radiation.

3.0 EQUIPMENT

- 3.1 Appropriate check source(s) or calibration source(s), as necessary.

4.0 PROCEDURE

4.1 Radiation Badge Issuance (Dosimeter)

- 4.1.1 Dosimeter will be issued to all individuals as per the Radiation Health and Safety Plan, section 6.0.
- 4.1.2 Individuals shall wear dosimetry when entering the Restricted Area at all times.
- 4.1.3 After exiting the Restricted Area dosimeters will be returned to Access Control.
- 4.1.4 At least one control dosimeter shall be posted in Access Control to assess normal background radiation.
- 4.1.5 Lost or damaged dosimeters shall be reported to the Recon RSO immediately.
- 4.1.6 Lost or damaged dosimeters shall be documented on form REC-WP-2-09-1.

4.2 Review/Notification/Reports

- 4.2.1 Individual exposure results will be maintained on NRC Form 5 in the RHASP Attachment 8.

Work Plan Procedures Manual

Remedial Construction Services, L.P. (Recon)
9720 Derrington
Houston, TX 77064
(281) 955-2442

Procedure: REC-WP-2-09

Title: RADIATION BADGE ISSUANCE

- 4.2.2 Dosimetry will be reviewed quarterly and annually by the Recon RSO.
- 4.2.3 Abnormal results will be investigated and reported by the Recon RSO to the Kaiser Aluminum and Chemical Corporation RSO.
- 4.2.4 Copies of individual exposure results will be provided to each individual at the end of each year.

5.0 REFERENCES

5.1 Radiation Health and Safety Plan, Attachment 8 (NRC Form 4)

6.0 ATTACHMENTS

Form REC-WP-2-09-1

Lost or Damaged Dosimeter Report

Form REC-WP-2-09-1

Remedial Construction Services, L.P. (Recon)
9720 Derrington
Houston, TX 77064
(281) 955-2442

Form REC-WP-2-09-1
Lost or Damaged Dosimeter Report

Name: _____ Date: _____

SSN: _____ Date Lost or Damaged: _____

Dosimeter Number: _____

Location Lost: _____

Remarks: _____

Signature

Radiation Safety Officer

Actions Taken: _____

Reviewed By

PROCEDURE: REC-WP-4-02

Air Sampling
Thorium Remediation Project
Tulsa, Oklahoma

REVISION: 01

EFFECTIVE DATE: APRIL 2004

Approved, Bill Vinzant

J. W. (Bill) Vinzant
Kaiser Aluminum & Chemical Corporation

4-7-04

Date:

Work Plan Procedures Manual

Remedial Construction Services, L.P. (Recon)
9720 Derrington
Houston, TX 77064
(281) 955-2442

Procedure: REC-WP-4-02

Title: Air Sampling

Purpose

The purpose of this procedure is to provide instruction for the collection of air samples.

1.0 DEFINITIONS

NA

2.0 PREREQUISITES PRECAUTIONS/LIMITATIONS

- 2.1 Air samples are performed in specific work areas to determine the extent of the airborne radiological hazards, establish radiological protective measures/controls and control personnel exposure.
- 2.2 Check the applicable health and safety guidance for the site. Ensure the proper protocol and other precautions delineated in the appropriate documents (e.g., Environmental Health and Safety Plan, Radiation Health and Safety Plan, Safety Work Permit, etc.) are followed.
- 2.3 Additional guidance on performing air sampling is provided in NUREG-1575.

3.0 EQUIPMENT

- 3.1 Air Sample Data Log (REC-WP-4-02-1), Air Sampler Filter Envelope(s) (REC-WP-4-02-2) and Air Sampling Analysis Log (REC-WP-4-02-3).
- 3.2 Black ink pen (indelible)
- 3.3 Cellulose-ester filters or other appropriate filters
- 3.4 High Volume Sampler

4.0 PROCEDURE

4.1 Preparation

- 4.1.1 Obtain air sample envelope(s) and fill out with the appropriate information: Date, Serial Number, and Placement Location.
- 4.1.2 Load filter head with appropriate filter and start pump.
- 4.1.3 Record time meter flow rate on sample envelope form REC-WP-4-02-2.

4.2 Collection

- 4.2.1 Record final pump stop time and ending flow rate on sample envelope.
- 4.2.2 Remove filter from sampling head and place in sample envelope.
- 4.2.3 Determine total elapsed time and enter on envelope and data log.

Work Plan Procedures Manual

Remedial Construction Services, L.P. (Recon)
9720 Derrington
Houston, TX 77064
(281) 955-2442

Procedure: REC-WP-4-02

Title: Air Sampling

- 4.2.4 Multiply total elapsed time by the average flow rate to determine volume sampled in liters of cubic feet as appropriate and enter on envelope.
- 4.2.5 Place sample media on a planchet and insert in Ludlum Model 2929 and record results on REC-WP-4-02-3.

5.0 REFERENCES

NA

6.0 ATTACHMENT

Form REC-WP-4-02-1
Form REC-WP-4-02-2
Form REC-WP-4-02-3

Air Sampling Data Log
Air Sampling Envelope
Air Sampling Analysis Log

Form REC-WP-4-02-1

Remedial Construction Services, L.P. (Recon)
9720 Derrington
Houston, TX 77064
(281) 955-2442

Form REC-WP-4-02-1
Air Sample Data Log

Date of Survey:			Ambient Conditions:			
Instrument Serial #:						
Calibration Due Date:						
BKG Counts:						
Placement Location	Flow Rate (lpm)	Pump Start Time	Pump Stop Time	Elapsed Time	Volume Collected	Comments
Prepared By:					Date:	
Reviewed By:					Date:	

Form REC-WP-4-02-2

Remedial Construction Services, L.P. (Recon)
9720 Derrington
Houston, TX 77064
(281) 955-2442

Form REC-WP-4-02-2
Air Sample Envelope

Date:	_____	Sample #	_____
Time On:	_____	Sampler ID #	_____
Time Off:	_____	Total Min:	_____
Flow:	_____	Volume:	_____
Technician:	_____		
Location:	_____		
Reason:	_____		

Form REC-WP-4-02-3

Remedial Construction Services, L.P. (Recon)
 9720 Derrington
 Houston, TX 77064
 (281) 955-2442

Form REC-WP-4-02-3
Air Sampling Analysis Log

Instrument Model:	2929
Instrument S/N:	
Detector Model:	43-10-1
Detector S/N:	
Calibration Due:	

Source S/N:	N/A	N/A
Source Amount	N/A	N/A
Radiation Detected:	Alpha	
Acceptable Range:		
(Refer to REC-WP-2-01-1)		

Date	Background Count Rate Alpha (cpm)	Gross a Sample Count Rate (cpm)	Net a Sample Count Rate (cpm)	(dpm/100 cm ²)	Technician	Comments

Prepared By:	Date:
Reviewed By:	Date: