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May 24, 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: Page changes to license renewal application dated 23 March 2004

Dear Elaine:

Per our discussions on 23 April 2004, this letter corrects minor errors and provides clarification of previous sections on the included page changes. Also, additional information previously reviewed by the NRC is included to complete the various documents submitted to the NRC on March 23, 2004 that make up the license renewal application for license SMB-920. These changes and clarifications are verified and approved by the licensee, Cabot Supermetals, Inc. (CSM), in the same manner as all prior submittals made by Weston Solutions, Inc for this license renewal process.

In addition to the corrections and changes described above, the following minor mistakes are documented for your records. The 29 March 2004 letter from Tim Knapp was erroneously placed on old letterhead that showed the company's former name of Cabot Performance Materials. The letterhead should have shown the company's name that was officially changed to Cabot Supermetals, Inc. in 2003. The cover letter should have indicated that information required for the NRC's Environmental Report was included in the supplemental information to the application. The reference to Draft Regulatory Guide DG 3014 in the first bullet on page 2 of the cover letter for the license renewal application dated 23 March 2004 should have been "NUREG-1757, Volume 3, September 2003". The soil density for scabbling dust of 1.22 MT/cubic yard was used in Appendix H, Attachment 4, Table 11 to convert from volume to mass. This value was taken from an average of actual volume and mass measurements of the material on the site.

In addition to the minor corrections described above, page changes are described below, and the corresponding corrected pages are attached to this letter.

Change 1: Information has been added following the first sentence in the last paragraph of Section 4.5 at the top of page 21 in Appendix H, in order to quantify the cost associated with disposing of the quantity of filtercake that might accumulate if site operations halted due to bankruptcy.

Change 2: The next to last sentence of Section 4.4, on page 19 has been corrected to say that the soil excavation depth is 12 inches, rather than 2 inches. This correction makes the statement concur with the rest of the document.

Change 3: The last bullet of Section 5.1.1, page 27, and the second sentence in Section 5.2.2, page 28 in Appendix H have been changed to indicate that the reference for labor and equipment rates is for the calendar year 2003.



Change 4: Site control and maintenance costs are discussed in text added as a final paragraph to Section 5.2.7, page 30 of Appendix H.

Change 5: The reference to NUREG 1757 listed in Section 6 of Appendix H was updated to indicate that the final version, released in September 2003, was consulted.

Change 6: Table 4-5, page 21 of Appendix H was revised to indicate that the units of measure were pCi/g.

Change 7: Information was added in Section 5, page 26 of Appendix H that quantifies the conservative overestimation of costs for containers, transportation, and disposal aspects of the D&D activities. Additionally, the cost estimate total was corrected in the first sentence of Section 5.

Change 8: A footnote was added in Table 11 of Attachment 4 to Appendix H that explains that container costs for presscake disposal include one-half the total number of containers indicated (268.7) because two trips to the disposal site are assumed, so each container is used twice. This information is consistent with statements added to Section 5 of Appendix H, in accordance with Change 7, above.

Change 9: Minor typos were corrected, and additional information was added to pages 2, 3, 7, 9, 10, 11, 13, 14, and 15 of the "Supplemental Information For Renewal Application For License Number SMB-920". In addition, a corrected page (page ii) is included for the Table of Contents.

These page changes indicate new information and corrections by lines in the margins and a revision date shown in the footer. These clarifications should resolve the last of your comments and questions. We look forward to receiving the new license at your earliest convenience. Please contact me if you have any questions.

Sincerely,
Weston Solutions, Inc.

A handwritten signature in blue ink that reads "Robert P. Schoenfelder".

Robert P. Schoenfelder, CHP
Client Services Manager

Cc: Tim Knapp, CSM