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December 21, 2004

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RECEIVED
REGION 1

Mr. Mark Roberts
Decommissioning and Laboratory Branch
Division of Nuclear Materials Safety
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406-1415

Re: Docket No. 0070-1143
License No. SNM-1120
Control No. ~~132761~~ 134148

Dear Mr. Roberts:

By letter dated July 13, 2004, our counsel informed you of our intention to commission a current radiation survey of the area known as the "ball field" located at Curtiss-Wright Electro-Mechanical Corporation's ("Curtiss-Wright") facility at 1000 Cheswick Avenue, Cheswick, Pennsylvania. On December 15, 2004, Curtiss-Wright, the current licensee, and Westinghouse Government Services Company LLC ("WGS"), the prior licensee, received the attached report (the "Enercon Report") setting forth the results of the current radiation survey conducted on November 8-9, 2004. The current radiation survey was conducted by ENERCON Services, Inc., a well-known engineering, decontamination and decommissioning contractor. As you will note, the Enercon Report concludes that "[t]he gamma walkover survey data shows all recorded measurements to be within the normal expected variability of background measurements (i.e., less than 2 times background)." In addition, you will note from Figure 2 of the Enercon Report that virtually all of the survey data indicated readings within +/-50% of background (1,532 CPM to 4,595 CPM). Thus, almost uniformly, the readings were substantially below 2 times background.

Moreover, the results of the current radiation survey are fully consistent with the substantial prior analyses and reviews that have already been performed in respect of the ball field, including, but not limited to, the following:

1. By letter dated November 13, 1984, the licensee submitted to the NRC a report prepared by IT Corporation dated October 25, 1984 regarding the ball field. The IT report generally concluded that "[b]ecause the exploratory trenches effectively located and quantified

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the allegedly contaminated debris and because monitoring of the debris by [the licensee] indicated no radiation hazard, additional excavation or drilling at the site does not appear to be necessary."

2. An NRC Region I Inspection Report accompanying a May 7, 1985 letter from Thomas T. Martin of the NRC to the licensee reported on the results of a follow-up inspection of the ball field area trenches and observed no violations. In particular, the Inspection Report stated:

> The inspector verified through review of soil sample analyses results presented in the licensee's letter to NRC Region I dated November 13, 1984 that the maximum soil contamination observed [in the ball field area] was 12 pCi U-235/gram of soil. NRC criteria limit soil contamination to a maximum of 30 pCi U-235/gram of soil. Confirmatory samples taken and analyzed by an NRC contractor, Oak Ridge Associated Universities, indicated that the soil sampled was below the NRC criteria.

3. The ORNL Sites Summary of March 16, 1994 (reviewed and approved by John Kinneman of the NRC) concluded that "[f]urther action at [the Cheswick facility] is not necessary by the ORNL Identified Sites Program." This review indicated that, in 1994, the "ORNL Score" for the Cheswick facility was 20, which is well below the NRC threshold for follow-up review (at the 300 level).

As you will recall, the NRC's Statements of Considerations accompanying the issued amendments to NRC's Decommissioning Rule, 10 C.F.R. Part 20, provide in pertinent part:

> "Not all licensees are required to submit decommissioning plans, and instead, may submit appropriate documentation including a report of the results of the radiation survey of the premises (see for example, 10 CFR 30.36). Because the rationale discussed above applies in general to all facilities, these grandfathering provisions apply to all licensees, independent of the type of documentation for license termination that has received NRC approval."

62 Fed. Reg. 39058, p. 33 (July 21, 1997).

In light of the results of the current radiation survey, which are fully consistent with the 20-year history of prior NRC and NRC contractor findings relative to the ball field, both Curtiss-Wright and WGS would like the opportunity to discuss our recommendation that no further remediation of the ball field should be required. In support thereof, the licensee, in cooperation with WGS, is planning to submit for NRC review and approval an exemption request pursuant to, e.g., 10 C.F.R. 30.11(a), relative to further remediation of the ball field area. Even as to the minimal historical readings of any residual radioactivity that had been detected relative to the ball field area over the past 20 years, it appears that all such readings were well within

permissible NRC background limits. We believe that the public interest would continue to be served by not disturbing the ball field area or altering the decay processes already effectively at work.

We have recently received the NRC's letter to Curtiss-Wright dated December 10, 2004 (Issuance of License Renewal, Control No. 134148). Among other things, the letter asks that we provide a plan to evaluate, and if necessary, decommission the ball field in accordance with 10 C.F.R. 70.38(d) and (g) by March 31, 2005. We consider the current radiation survey set forth in the Enercon Report to be responsive to that request. For the reasons set forth above, we believe that the exemption described above is justified.

We look forward to substantively discussing the current radiation survey and our anticipated exemption request with your office in early 2005. Please contact me so that we can arrange for such a pre-filing discussion.

Very truly yours,

George P. McDonald

cc: Karl L. Farrar, Esq.
Regional Counsel
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406-1415

C. Lim/L. Lamantia, representatives of Curtiss-Wright

Steven Washington, Esq., representative of WGS

Jay E. Silberg, Esq., counsel to Curtiss-Wright

Roy P. Lessy, Jr., Esq., counsel to WGS

CURTISS WRIGHT

ENERCON SERVICES, INC.
An Employee Owned Company

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(412) 733-8711
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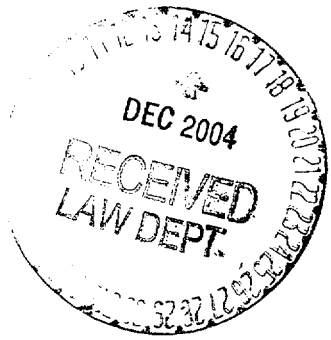
December 7, 2004



Westinghouse Government Services Company, LLC
Care of Mr. Sean D. Vincent, P.G.
Staff Hydrogeologist
720 Park Boulevard
Boise, ID 83712

Curtiss-Wright Electro-Mechanical Corporation
1000 Cheswick Avenue
Cheswick, PA 15004
Attention: Mr. Charles Lim

Dear Messrs. Vincent and Lim:

ENERCON Services, Inc (ENERCON) is submitting this report of the gamma walkover survey of the area described as the ball field located at the Curtiss-Wright Electro-Mechanical (Curtiss-Wright) facility located at 1000 Cheswick Avenue, Cheswick, Pennsylvania. This work was completed under the authorization of both Westinghouse Government Services Company, LLC (WGS), and Curtiss-Wright.

Survey Methodology

The GPS Walkover Survey was conducted using the Trimble Pro XR GPS Data Logger attached to a Ludlum 2221 Digital Scale/Rate meter with a 2"x2" NaI detector and a lead columinator. The baseline settings for the GPS unit were set to ensure data reproducibility and reliability. As the setup and verification field checks were made, it was noted that contact with a minimum of 6 satellites was maintained throughout the field data collection. At least four satellite contacts are required to accurately identify the location of the readings, and additional satellite contacts add to the accuracy and reliability of the data. Data reliability is considered to be within an approximate accuracy of 0.5 meters. The attached table provides additional details on the survey instrumentation.

Prior to starting the walkover survey, three (3) specific benchmark reference points were located and measured for accuracy and reproducibility in data plotting. The selected locations were as follows:

- At the intersection of the fence south of the office building and the fence surrounding the ball field.
- At the gate entrance to the ball field on the east side of the parking lot.
- At the corner of the air monitoring station on the east of the ball field approximately ½ way across the field.

Each location was monitored for approximately 60 seconds to ensure a consistent and reproducible data stream. Pin flags were inserted in the ground at each benchmark point. After each reference location was checked, field gamma walkover data was collected by walking a linear pattern back and forth across the field in passes approximately 1 meter in width. During each pass the sodium iodide detector was passed approximately 6 inches from the surface of the ground in a swinging action. With each 5-second interval logged on the Data Logger, a CPM (count per minute) and the GPS coordinates for that particular point were recorded.

After all of the intended data was collected in the Data Logger using the TerraSync software, it was then downloaded into a computer and processed to be mapped on the base AutoCAD map of the site. Data was mapped by Cummings-Riter Consultants, Inc. (Cummings-Riter) on a site base map prepared for the site by Cummings-Riter for WGS.

Site Background

Site background was measured with the Ludlum 2221 and a 44-10 probe outside the ball field prior to the start of the survey. A total of five measurements were taken in the asphalt parking lot and along the main access road to the plant. The average of the five background readings was 3,063 CPM with a range of 2,874 CPM to 3,251 CPM.

Data Plotting

At the conclusion of the data collection activities, it was noted that all gamma measurements were below two times background. Data plotting ranges were selected to be as follows:

- Readings less than 50% of the site background (less than 1,532 CPM)
- Readings within +/- 50% of background (1,532 CPM to 4,595 CPM)
- Readings within 1.5 to 2 times background (4,595 to 6,126 CPM)
- Readings greater 2 times background (more than 6,126 CPM)

Figure 1 provides a plot of the data showing the site using a scale of 1:300, and Figure 2 provides a plot of the data showing just the ball field using a scale of 1:60. The area surveyed at the site was measured using the AutoCAD system to be 3.52 acres. A total of 7,921 gamma measurements and corresponding GPS coordinates were collected.

Conclusions

The gamma walkover survey data shows all recorded measurements to be within the normal expected variability of background measurements (i.e., less than 2 times background).

Sincerely,

Gerald E. Williams, P.E.
Senior Project Manager

GEW:ljz

Enclosures

Table

Table of Gamma Walkover Survey Instrumentation

Ludlum Model 2221	Serial Number 138347
Ludlum Model 44-10	Serial Number 220119
Instrument efficiency	5%, measured using Cs-137 source
Trimble PRO XR GPS Data Logger	Serial Number 000043061

Figures

Note: Figures 1 & 2 provided separately due to size of drawings.

	:	(FOR LFMS USE)
	:	INFORMATION FROM LTS
BETWEEN:	:	----------
	:	
License Fee Management Branch, ARM	:	Program Code: 22200
and	:	Status Code: 0
Regional Licensing Sections	:	Fee Category: 14
	:	Exp. Date: 20141231
	:	Fee Comments: V
	:	Decom Fin Assur Reqd: Y

LICENSE FEE TRANSMITTAL

A. REGION I

1. APPLICATION ATTACHED
   Applicant/Licensee: CURTISS-WRIGHT ELECTRO-MECH. CORP.
   Received Date: 20050104
   Docket No: 7001143
   Control No.: 136231
   License No.: SNM-1120
   Action Type: Notifications

2. FEE ATTACHED
   Amount: /
   Check No.: /

3. COMMENTS

Signed M. A. Barkin
Date 1/4/2005

B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered /__/)

1. Fee Category and Amount: _____

2. Correct Fee Paid. Application may be processed for:
   Amendment _____
   Renewal _____
   License _____

3. OTHER _____
   _____

Signed _____
Date _____