

From: "Schoenfelder, Robert P." <R.Schoenfelder@WestonSolutions.com>
To: "NRC HQ-Mike Raddatz" <MGR@nrc.gov>
Date: 5/19/05 3:11PM
Subject: Assurance of 100:1 Dilution - Cabot Corp. - Docket 40-6940

Mike;

The draft language we discussed for assuring that kiln recycling of CSM filtercake maintains a 100:1 dilution ratio is provided below. The same language is provided in the attached Word document in case a separate text file is useful to you. If you concur with this approach and need an official submittal of this information, please let me know. Regards,
-Bob

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Method to Assure Filtercake Dilution Ratio
Cabot Supermetals, Inc. License SMB-920
Amendment Application for Cement Kiln Recycling of WWTP Filtercake
19 May 2005

The dose assessment that supports the kiln recycle license amendment application from Cabot Supermetals, Inc (CSM) fixes a minimum dilution ratio of 100:1 for mixing standard kiln feed materials with CSM filtercake. Routine cement kiln operations require strict controls on the kiln furnace temperature and the moisture content of the product. Thus, the cement kiln operation desires feed materials with low moisture content, and sets its parameters for feed rate and furnace temperature based on a moisture content that is much lower than the 50% value associated with the CSM filtercake. As a result, the cement kiln will necessarily ensure that CSM filtercake is mixed with drier routine feed materials to ensure that the mixed feed has average moisture content within the standard operating range for the plant. Also, CSM continually generates the moist filtercake and must ship the material off-site at least several times a week. The filtercake will therefore be part of the routine supply process for the kiln rather than provided in large quantities at infrequent intervals.

To provide additional assurance that the dilution ratio of the filtercake will be maintained at a minimum of 100:1, CSM will incorporate appropriate language into its contract with the cement kiln requiring their agreement to maintain this ratio. In addition, the contract will include a clause that authorizes staff or managers from CSM to inspect the kiln operation at least once in any year that significant quantities of filtercake are shipped there, with the intent of verifying that the dilution ratio is maintained. Records of these inspections will be maintained in CSM's NRC license files maintained by the SH&E Department.

CC: "Schoenfelder, Robert P." <R.Schoenfelder@WestonSolutions.com>, "Tim Knapp" <Timothy_Knapp@cabot-corp.com>

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Created By: R.Schoenfelder@WestonSolutions.com

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