UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-4005

July 26, 2005

Mr. E. Jonathan Jackson, President/CEO
FMRI (a subsidiary of reorganized Fansteel, Inc.
Number Ten Tantalum Place
Muskogee, Oklahoma 74403

SUBJECT: INSPECTION REPORT 040-7580/05-001 AND NOTICE OF VIOLATION

Dear Mr. Jackson:

This refers to the inspection conducted on May 4, 2005, at FMRI's rare earth recovery facility in Muskogee, Oklahoma. The purpose of the inspection was to examine activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations, conditions of your license, and the approved decommissioning plan. Within these areas, the inspection consisted of selected examination of procedures and representative records, facility site tours, and interviews with personnel related to the pilot study for the Phase I Remediation Project. An exit briefing was conducted onsite at the conclusion of the inspection and a final telephonic exit was conducted on June 29, 2005, to discuss the inspection findings. The enclosed report presents the results of this inspection.

Based on the results of the inspection, the NRC has determined that a Severity Level IV violation of NRC requirements occurred. This violation was evaluated in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy). The current Enforcement Policy is included on the NRC's website at www.nrc.gov; select **What We Do, Enforcement**, then **Enforcement Policy**. The violation cited in the enclosed Notice of Violation (Notice) (Enclosure 3) involved a failure to provide an updated Table 15-12, as required by License Condition 45, which contains financial projections for Fansteel, the parent company of FMRI and a source of funding for FMRI decommissioning. The circumstances surrounding this violation, the significance of the issues, and the need for lasting and effective corrective action were discussed with you and members of your staff on June 29, 2005.

FRMI is required to respond to this letter and should follow the instructions specified in the enclosed Notice of Violation in preparing your response. For your consideration and convenience, an excerpt from NRC Information Notice 96-28, "SUGGESTED GUIDANCE RELATING TO DEVELOPMENT AND IMPLEMENTATION OF CORRECTIVE ACTION," is enclosed." The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, Enclosure 1, and your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at http://www.nrc.gov/reading-rm/Adams.html. To the extent possible, your

response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public without redaction.

Should you have any questions concerning this inspection, please contact Mr. Rick Muñoz at (817) 860-8220 or the undersigned at (817) 860-8191.

Sincerely,

/RA/

D. Blair Spitzberg, Ph.D. Chief
Fuel Cycle and Decommissioning Branch

Docket No.: 040-07580
License No.: SMB-911

Enclosures:
1. Notice of Violation
2. NRC Information Notice 96-28

cc w/o Enclosure 2:

Mr. Walter Beckham, City Manager
City of Muskogee
229 West Okmulgee
Muskogee, Oklahoma 74401

Mr. George Brozowski, Regional Health Physicist
U.S. Environmental Protection Agency, Region VI
1445 Ross Avenue
Mail Stop-6PDT
Dallas, Texas 75202

Timothy Hartsfield
District Environmental Manager
Tulsa District
U.S. Army Corps of Engineers
1645 South 101st East Avenue
Tulsa, Oklahoma 74128

Ms. Kelly Hunter Burch
Assistant Attorney General
Office of Attorney General
4545 North Lincoln Blvd., Suite 260
Oklahoma City, OK 73105

Ms. Afsaneh Jabbar, Manager
Oklahoma Department of Environmental Quality
Industrial Permit Section
Water Quality Division
P.O. Box 1677
Oklahoma City, Oklahoma 73101-1677

Mr. Mike Broderick, Administrator
Oklahoma Department of Environmental Quality
Waste Management Division
Radiation Management Section
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Mr. Kevin Sampson
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Ms. Pamela Bishop
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Mr. Phillip Fielder
Oklahoma Department of Environmental Quality
Air Quality Division
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Oklahoma City, Oklahoma 73101-1677

Mr. Richard Gladstein, Esq.
Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

Mr. John Flyn, Environmental Engineer
Oklahoma Department of Environmental Quality
Waste Management Division
Radiation Management Section
P.O. Box 1677
Oklahoma City, Oklahoma 73101-1677

bcc w/o Enclosure 2 (via ADAMS distrib):
LDWert
GFSanborn
JCShepherd, NMSS/DWMEP/DCB
CMCraig, NMSS/DWMEP/DCB
MCNolan, OE
MSchwartz, OE
OEMAIL
DBSpitzberg
RRMuñoz
BASchlapper
RJEvans
KFuller-Smith
FCDB File
RIV Nuclear Materials File - 5th Floor

SISP Review Completed: RRM
ADAMS: X Yes No Initials: RRM
_X_Publicly Available ____Non-Publicly Available ____Sensitive _X_Non-Sensitive

DOCUMENT NAME: S:\DNMS\!Nmib\!Munoz\50758001.wpd final r:_dnms

RIV:DNMS:FCDB	RIV:DNMS:NMIB	C:FCDB
BASchlapper	RRMuñoz	DBSpitzberg
/RA/	***/RA/***	***/RA/***
07/26 /05	07/26/05	07/26/05

OFFICIAL RECORD T=Telephone E=E-mail F=Fax

ENCLOSURE 1

NOTICE OF VIOLATION

FMRI (a subsidiary of reorganized Fansteel, Inc.) Docket No. 040-07580
Muskogee, Oklahoma License No. SMB-911

During an NRC inspection conducted on May 4, 2005, a violation of NRC requirements was identified. In accordance with Enforcement Policy and Procedure for NRC Enforcement Actions, the violation is listed below:

> 10 CFR 40.41 requires, in part, that each person licensed by the commission pursuant to the regulations in this part shall confine his possession and use of source or byproduct material to the locations and purposes authorized in the license.
>
> License No. SMB-911, Condition 45, states in part, that FMRI shall submit updated versions of Tables 15-11 and 15-12, showing actual figures for previous periods and updated projections using current information.
>
> Contrary to the above, although FRMI submitted a letter dated March 30, 2005 that included Table 15-11 showing expenditures and figures for previous periods, the licensee failed to include Table 15-12 which should have provided updated projected income using current information.
>
> This is a Severity Level IV violation (Supplement VI).

Pursuant to the provisions of 10 CFR 2.201, FMRI is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region IV, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation; NOV-05-01" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html, to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public without redaction. If personal privacy or proprietary information is

necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated this 26th day of July 2005

ENCLOSURE 2

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket No.:	040-07580
License No.:	SMB-911 (expired September 30, 2002)
Report No.:	040-07580/05-001
Licensee:	FMRI (a subsidiary of Reorganized Fansteel)
Facility:	Muskogee Plant
Location:	Muskogee, Oklahoma
Inspection Date:	May 4, 2005
Inspector:	R. Rick Muñoz, Health Physicist Fuel Cycle & Decommissioning Branch
Accompanied By:	John Flyn, Environmental Engineer Oklahoma Department of Environmental Quality Waste Management Division Radiation Management Section
	J. Paul Davis, Environmental Programs Specialist Oklahoma Department of Environmental Quality Land Protection
	Paul Johnson, Water Permit Writer Oklahoma Department of Environmental Quality
	Dennis Cummings, Oklahoma Department of Labor
Approved By:	D. Blair Spitzberg, Ph.D., Chief Fuel Cycle & Decommissioning Branch
Attachment:	Notice of Violation
	Supplemental Inspection Information

EXECUTIVE SUMMARY

Fansteel, Inc., Muskogee Plant
NRC Inspection Report 040-07580/05-001

This inspection included a review of management organization and controls, and radiation protection activities related to the waste in process (WIP) Dewatering Pilot Study.

Management Organization and Controls

- Although the licensee submitted financial documents related to decommissioning activities, FMRI had not provided complete documentation information related to financial conditions as required. This was identified as a Severity Level IV violation (Section 1).

- The staffing levels were adequate to maintain the plant during the plant shutdown condition and the WIP dewatering and drying pilot study (Section 1).

- The contractor work package for the WIP drying study pilot was complete with detailed work plans. The package included a description of the work to be performed and the required qualifications for contractors needed during the pilot study. An inspection follow-up item regarding contractor qualifications opened during a previous inspection was closed (Section 1).

Radiation Protection

- The licensee implemented a radiation protection program that met the requirements of the license. Occupational exposures during the pilot study were being monitored. Contamination control efforts were effective, and radiation survey instruments in use were operable and in calibration (Section 2).

Report Details

Summary of Site Status

At the time of the inspection, the facility was conducting a waste in-process (WIP) de-watering and drying pilot study with plans to initiate Phase I of the decommissioning activities. The primary material drying operation was performed in the Pond 3 area by placing the residue WIP material from Pond 3 in piles and allowing them to dry by gravity dewatering and air-drying. A parcel of land near Pond 3, named the transportation preparation and packaging area (TPPA), was bermed and lined (temporary fabricated containment area) for use as a processing area.

Plant systems were in suspended operations mode, but the groundwater treatment system, waste water treatment plant, environmental monitoring systems, plant boilers, air compressors, and building utilities (electricity, heat, water) remained in-service. All process systems had been drained of potentially radioactive material, and previously bagged WIP material remained in storage in the former sodium reduction building. All CaF_2 material in the plant was returned to onsite Ponds 8 and 9 via the waste water treatment system.

Solvent extraction material from the process circuit was stored in covered 55-gallon polyvinyl chloride drums on pallets within a concrete berm area adjacent to the Chem C building.

1 Management Organization and Controls (88005)

1.1 Inspection Scope

The organizational structure and license condition requirements were reviewed to determine whether management controls were in place to ensure compliance with the license and regulatory requirements.

1.2 Observations and Findings

The inspector interviewed licensee staff regarding the organizational structure and reviewed related documentation and license condition requirements. The licensee replaced its project manager in January 2005. In addition, the quality control manager/administrative assistant had resigned and the position remained vacant. Current staffing levels were adequate to maintain compliance with regulatory and license requirements during the pilot study and current status of the site.

Although decommissioning related to a dewatering and drying pilot study of the WIP material had been undertaken, as of June 4, 2005, no off-site removal of WIP material had been initiated. The failure to commence decommissioning activities by September 1, 2004 was previously identified as a violation of License Condition 26 (VIO 040-07580/0401-01 & EA-04-188). At the time of the inspection, FMRI was in the beginning stages of the WIP drying pilot study, but had not commenced Phase 1 remediation. Therefore, no WIP material from Ponds 2 and 3 had been excavated or prepared for shipment offsite. This violation remains open.

During a previous inspection, an Inspection Follow-up Item (IFI 040-07580/0401-02) was opened regarding contractor work plans and qualifications. FMRI has authorized A & M

Engineering and Environmental Services, Inc. (Tulsa, OK) to conduct the pilot scale study on air-drying WIP to support planning and preparation for the pending Phase I activities. The licensee had received contractor qualifications to perform the Phase I remediation. Essential contractor personnel performing critical activities related to the pilot study met the requirements established in the approved DP. Procedures associated with the study met the commitments of the approved DP. This inspection follow-up item is closed.

License Conditions 43 - 45 and 47 required the submittal of annual financial reporting. License Condition 45, states in part, that FMRI shall submit updated versions of Tables 15-11 and 15-12, showing actual figures for previous periods and updated projections using current information by March 31st of each year. Although FRMI submitted a letter dated March 30, 2005 which included Table 15-11 showing expenditures and figures for previous periods, the licensee failed to include Table 15-12 which should have provided updated projected income for the licensee's parent company, Fansteel, using current information. The failure to provide the required financial information was identified as a violation of License Condition 45 (NOV 040-07580/0501-01).

1.3 Conclusions

Although the licensee submitted financial documents related to decommissioning activities, FMRI had not provided complete documentation of information related to financial conditions as required. This was identified as a Severity Level IV violation (NOV 040-07580/0501-01).

The staffing levels were adequate to maintain the plant during the plant shutdown condition and the WIP dewatering and drying pilot study.

The contractor work package for the WIP drying study pilot was complete with detailed work plans. The package included a description of the work to be performed and the required qualifications for contractors needed during the pilot study. An inspection follow-up item regarding contractor qualifications identified during a previous inspection was closed.

2 Radiation Protection (83822)

2.1 Inspection Scope

The licensee's radiation protection program related to activities associated with the WIP dewatering and drying pilot study was reviewed. The review included: site tours, observations, personnel exposure controls, special work permits, contamination surveys, instrument calibrations, and area monitoring.

2.2 Observations and Findings

a. WIP Drying and Dewatering Pilot Study

The primary focus of the pilot study was to determine the feasability of air drying the residue material to a proposed goal of 20% moisture content in preparation for

transportation off-site. Included in this pilot study was the excavation and preparation for transportation of approximately 300 cubic yards of radiologically-affected residue material located in Ponds 2 and 3. The residue material was monitored visually and segregated based on the excavated material consistency and type. Along with the base concept of air drying, the contractor was allowed to attempt additional mechanical methodologies at the request of FMRI to either assist in or substitute for the final accepted methodology. The primary material drying operation was performed in the pond areas by placing the WIP material in piles and allowing them to dry by gravity dewatering and air drying. A parcel of land near Pond 3, named the transportation preparation and packaging area (TPPA), was bermed and lined (temporary fabricated containment area) for use as a processing area.

A tour was conducted to observe facility conditions and activities in progress related to the pilot study. The WIP material was excavated and stockpiled in 150-200 cubic yard piles along the inside fringe of the ponds for primary drying. Following the gravity dewatering and primary drying, the piles were to be transported to the TPPA with a front-end loader and spread with a dozer, or other mechanical means, for further air-drying. The spread residue material was turned by mechanical means in order to further enhance the effectiveness of the air drying process. The material continued to be mechanically turned and air dried to targeted moisture content. At the time of the inspection, the pilot study was in its initial stages, and the air-dried residue material had not been placed in super sacks. FMRI planned to load the air-dried residue with the assistance of a front-end loader and hopper/conveyor bagging system into super sacks that will be weighed on a certified scale and transported to the staging/storage area with a forklift awaiting transportation off-site.

FMRI had prepared and implemented the pilot study work plan, residue dewatering and drying plan, health and safety plan, storm water pollution prevention plan, environmental monitoring and control plan, excavation plan, material handling plan, and other procedures needed for the pilot study. There was a process in place to update procedures as required following the initial investigation and data collection process. FMRI had completed training workers, assigning dosimeters, implementing radiological delineation procedures and establishing work zones (i.e. radiologically controlled areas, decontamination areas, control zones, contamination reduction zones, and support zones). The work areas and TPPA had been established. Pond 3 was prepared for material removal which included pumping out standing water, temporary dikes, berms, and equipment access platforms using Pond material to support material handling for the pilot study. Some WIP residue had been excavated and stockpiled to allow gravity dewatering.

Although there is no specific packaging requirement, FMRI anticipates challenges with the staging/storage area. FMRI will use Section 3.6 of the decommissioning plan describing storage, and function of the TPPA during Phase I activities. All of Section 3.6 shall be used, with the exception of pallets, as required by License Condition 25. This is because of the potential for containment integrity damage to the super sacks that may be caused by storage on raised pallets. In the event that the transportation portion can not be completed for Phase I activities, the licensee plans to fabricate a storage area to store the bagged residue until the material can be shipped off-site to an approved licensed or permitted facility.

FMRI planned to initiate moisture content and density observations as required for the pilot study. Once the WIP is determined to be at the acceptable 20% moisture content, the Pond 3 material will be placed in the TPPA for additional dewatering, monitoring, and packaging for off-site disposal. Material in Pond 2 will undergo the same process once the existing cap material has been removed to establish dikes, berms, and equipment access platforms as needed for the pilot study.

b. Occupational Exposures

Area radiological controls and personnel radiological controls were implemented to monitor and reduce any potential airborne contamination in the work zone during the pilot study activities. Continuous facility perimeter air sampling was performed on a routine weekly basis. Thermoluminescent dosimeters were worn whenever workers were engaged in activities where radioactive material was present. FMRI monitored workers for internal exposures in accordance with Section 3.5.1 of the license application. Monitoring consisted of work area air samplers and lapel air samplers identified in the approved special work permits.

c. Special Work Permits

In accordance with Section 3.2 of the license application, the licensee had a special work permit program in place. Special work permits (SWP) were used for the pilot study and all maintenance tasks involving licensed material. A review of the pilot study SWPs was conducted. Half-face respirators were required for jobs in potential airborne radiation areas lasting greater than four hours. The SWPs listed both radiological and non-radiological safety hazards, personnel protective equipment requirements, and monitoring requirements. Workers were required to sign the SWPs indicating that they read and understood the permit requirements. The ALARA standard for the site maintains employee DAC-hrs well below 12 per week. If DAC-hrs exceed 40, the licensee initiates an investigation and notifies the NRC. The inspector concluded that the licensee was using the special work permit program to minimize potential radiological hazards to plant workers and contractors during the pilot study.

d. Contamination Control

The licensee had a contamination control program in place at the site that included routine bi-weekly swipe samples and surface surveys of plant areas for removable contamination. FMRI was maintaining the surface contamination control program for compliance with Section 3.5.2 of the license application. FMRI instituted an action level of 200 dpm/100 cm^2 removable and 1000 dpm/100 cm^2 total for fixed alpha contamination and an action level of 1000 dpm/100 cm^2 removable and 5000 dpm/100 cm^2 total for fixed beta contamination.

Section 3.5.2 of the license application states that surface contamination surveys will be conducted prior to release of equipment from radiologically controlled areas. The licensee had a contamination control program in place at the site that included equipment release control. No items had been free released from the pilot study at the time of the inspection. Additionally, FMRI had established background levels for PM10 (particulate

monitoring for particles less than 10 microns in size) dust monitoring, as well as, background levels for personnel contamination monitoring. This licensee was effectively monitoring personnel for contamination.

e. Instrument Calibration

At the time of the inspection, the licensee had seven radiological survey instruments calibrated, fully functional, and available for use. The removable contamination swipe counter was efficiency checked each day prior to use using calibrated check sources and was last serviced by the manufacturer on January 13, 2004. Lapel air samplers were calibrated just prior to use using a flow calibrator. The flow calibrator was calibrated on an annual basis. Equipment removed from service had been clearly tagged out-of-service.

2.3 Conclusions

The licensee implemented a radiation protection program that met the requirements of the license. Occupational exposures during the pilot study were being monitored. Contamination control efforts were effective, and radiation survey instruments in use were operable and in calibration .

3 Followup (92701)

(Opened) NOV 040-07580/0501-01: Failure to provide an updated version of Table 15-12.

License Condition 45, states in part, that FMRI shall submit updated versions of Tables 15-11 and 15-12, showing actual figures for previous periods and updated projections using current information. Although FRMI submitted a letter dated March 30, 2005 that included Table 15-11 showing expenditures and figures for previous periods, the licensee failed to include Table 15-12 which should provide a projected income using current information from Fansteel. The failure to provide the required financial information was identified as a violation of License Condition 45 (NOV 040-07580/0501-01).

(Closed) IFI 040-07580/0401-01: Submit the experience and education requirements for the Health Physics Supervisor, the Construction Supervisor, and the Quality Control Officer.

Work plans and qualifications for the Dewatering and Drying Pilot Study for Phase I decommissioning was submitted under the requirements of License Condition 37(a). License Condition 50 requires additional education requirement verification. Since the last inspection, the licensee selected a contractor. The contractor package and associated information reviewed was complete. This follow-up item (IFI 040-07580/0401-01) was closed.

(Discussed) VIO 040-07580/0401-01 & EA-04-188: The failure to commence decommissioning activities by the required date of September 1, 2004, was identified as a violation of License Condition 26.

A violation was issued April 12, 2005 involving the failure of FMRI to initiate site remediation and decommissioning activities by the start date required by the license. Specifically, License Condition 26 requires, in part, that FRMI perform remediation and decommissioning activities in accordance with the decommissioning plan and correspondence referenced in the license condition. Both the May 8 and July 24, 2003, referenced correspondence stated that FMRI was prepared to take steps to accelerate the schedule for Phase 1 decommissioning with actual remediation to begin by September 1, 2004, and to be completed by March 31, 2006, taking into account considerations for preparation, scheduling, cost and weather. At the time of the inspection, remediation activities had not begun at the site, and therefore NRC issued a Severity Level IV violation. As of May 4, 2005, Phase 1 remediation had not commenced. Although FMRI had begun a pilot study for WIP drying and dewatering, no WIP material had been removed, and shipped off-site for disposal or disposition. FRMI responded to the Notice of Violation by letter dated May 9, 2005. FMRI's response is still under NRC review.

4 Exit Meeting Summary

The inspector reviewed the scope and findings of the inspection during a preliminary exit meeting conducted at the conclusion of the onsite inspection on May 4, 2005. A final telephonic exit was conducted on June 29, 2005, with the president and radiation safety officer of the facility. The licensee did not identify any documents as proprietary or any other information provided to, or reviewed by, the inspector.

ATTACHMENT

SUPPLEMENTAL INFORMATION

PARTIAL LIST OF PERSONS CONTACTED

Licensee

Keyton Payne, Manager, Regulatory Compliance
Clay Adams, Radiation Technician
James Burgess, Plant Operations Manager

Contractor

Dan Baker, Health Physics Supervisor
Robert Kowey, Operator
Gary Oplotnick, Mechanic

INSPECTION PROCEDURES USED

IP 83822	Radiation Protection
IP 88035	Radioactive Waste Management
IP 92701	Followup

ITEMS OPENED, CLOSED AND DISCUSSED

Closed

IFI 040-07580/0501-01 Submit the experience and education requirements for the Health Physics Supervisor, the Construction Supervisor, and the Quality Control Officer.

Work plans and qualifications for the Dewatering and Drying Pilot Study for Phase I decommissioning was submitted pursuant to the requirements of License Condition 37(a). License Condition 50 requires additional education requirement verification. Since the last inspection, the licensee selected a contractor. The contractor package and associated information reviewed was complete. This follow-up item (IFI 040-07580/0501-01) will be closed.

Discussed

VIO 040-07580/0401-01 Failure to commence decommissioning activities by the required date of September 1, 2004 as required by License Condition 26.

As of May 4, 2005, Phase 1 remediation had not commenced. Although FMRI had begun a pilot study for WIP drying and dewatering, no WIP material had been removed, and shipped off-site for disposal or disposition. FRMI responded to the Notice of Violation by letter dated May 9, 2005. FMRI's response is still under NRC review.

LIST OF ACRONYMS USED

CaF_2	calcium fluoride
CFR	Code of Federal Regulation
CR	Condition Report
IFI	Inspection Followup Item
IP	Inspection Procedure
NRC	Nuclear Regulatory Commission
pCi/L	picocuries per liter
RSO	radiation safety officer