

September 21, 2005

David R. Smith  
Environmental Manager  
Shieldalloy Metallurgical Corporation  
Aluminum Products & Powders Division  
14 West Boulevard, P.O. Box 768  
Newfield, NJ 08344-0768

SUBJECT: NRC STAFF REVIEW OF DRAFT DOCUMENTS PERTAINING TO  
DECOMMISSIONING OF THE SHIELDALLOY SITE IN NEWFIELD, NEW  
JERSEY

Dear Mr. Smith:

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed your May 26, 2005, Draft Environmental Report and your July 29, 2005, Draft Chapter 7 of your Decommissioning Plan (DP) regarding As Low As Reasonably Achievable Analysis. As you noted in previous discussions, the documents that you submitted are incomplete and contain a number of placeholders and descriptive elements that are awaiting other information. The purpose of NRC's review of those documents was to identify significant deficiencies that prevent the NRC staff from accepting your DP when it is submitted in the near future. The enclosed comments provided in this letter should not be construed as a technical review or an acceptance review relative to your final DP submittal.

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If you have any questions regarding this letter, please call me at 301-415-6664 or email me at [klk@nrc.gov](mailto:klk@nrc.gov).

Sincerely,

***/RA/***

Kenneth L. Kalman, Project Manager  
Materials Decommissioning Section  
Decommissioning Directorate  
Division of Waste Management  
and Environmental Protection  
Office of Nuclear Material Safety  
and Safeguards

Docket No.: 04007102  
License No.: SMB-743  
Control No.: 132074

Enclosure: NRC Staff Comments on ShieldAlloy Submittals

cc:

Eric Jackson, President  
Jill Lipoti, Ph.D., NJ DEP  
Donna Gaffigan, NJ DEP  
Trevor Anderson, US EPA  
L. Williams, Newfield Resident  
T. Ragone, Newfield Resident

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OFFICE	DWMEP:PM	DWMEP:SC
NAME	KKalman	KGruss
DATE	9/12/05	9/19/05

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# **NRC STAFF COMMENTS ON SHIELDALLOY SUBMITTALS**

## Draft Environmental Report

1. The regulatory framework for SheildAlloy Metallurgical Corporation (SMC)'s use of the Long Term Control (LTC) license is unclear. SMC should discuss the Licence Termination Rule and the LTC license by citing 10 CFR 20 Subpart E, applicable guidance such as SRM-SECY-03-0069, as well as the interim guidance SMC already cites in the Environmental Report (ER). Readers of the ER should have the LTC license regulatory framework referenced to the regulations and Commission approved policy.
2. What is the radiological impact to workers from alternative 1 and alternative 2? This section is in the ER but is incomplete.
3. Cost benefit analysis is needed to compare alternative 1 and alternative 2. This is in the ER but incomplete.
4. Include a reference to Sole Source Aquifer designation. Appendix E has a support document dated May 1998, that recommends the N.J. Coastal Plain Aquifer be given Sole Source designation. Has this recommendation been finalized? If so, does Sole Source designation have any impact on the Environmental Impact Statement analysis?
5. Will there be a long-term monitoring program for the remaining landfilled material? Will there be monitoring for radiological constituents to confirm there is no groundwater/ surface water contamination from leakage/runoff from the landfill? Will there be monitoring for radiological constituents to confirm there is no increased air discharges or discharges from fugitive dust? If monitoring is included, who would be responsible for monitoring?
6. What is the basis for considering a LTC possession only license? Your analysis should explain why preferred alternative 1 is superior to alternative 2. There does not appear to be a clear environmental or safety reason that alternative 2, the removal of radiological material to Utah, should not be pursued.

## Draft ALARA Analysis

1. Please note that your transmittal refers to this section of your Decommissioning Plan (DP) as Section 6, yet the draft that you provided is labeled as Section 7. Please make the appropriate correction before submitting your DP for our review.