Westinghouse Electric Company
Hematite Facility
3300 State Road P
Festus MO 63028
U.S.A.

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001

September 12, 2005

Attention: Ms. Amy Snyder

Subject: Submittal of Hematite Decommissioning Plan and Supporting Documents, Licensee No. SNM-33 (Docket 070-00036)

Reference: 1. Schedule For Hematite Decommissioning Plan (TAC No. L52624), June 20 2005, letter from Amy M. Snyder to A. Joseph Nardi

Dear Ms. Snyder:

Westinghouse Electric Company LLC ("Westinghouse") is herewith submitting the Decommissioning Plan, Revision 2, for the Hematite Former Fuel Fabrication Facility in Festus, Missouri ("Hematite site") in accordance with Reference 1. Revision 2 supersedes all previous revisions. Westinghouse requests that upon approval, the Decommissioning Plan, as amended and revised, be incorporated into SNM-33. Enclosed with this letter are six CD-ROMs containing five reports in PDF file format for review.

In conjunction with this submittal and in accordance with 10 C.F.R. § 70.38(i), Westinghouse requests that the Nuclear Regulatory Commission ("NRC" or "Commission") approve an alternate schedule for decommissioning of the Hematite site in conformance with the schedule set forth in Figure 8-1, Projected Decommissioning Schedule, of the Decommissioning Plan, Revision 2. A 24-month period for completion of decommissioning is insufficient based on a number of factors. These factors include:

- The complexity of the actions necessary to decommission the Hematite site, e.g., the remediation of the burial pits require unique actions and deliberate steps to accomplish.
- A number of required steps are interrelated and require sequential steps, e.g., building demolition is required to permit access to complete characterization of the soils under the buildings.

Other site-specific factors also affect the schedule of Hematite decommissioning:

- There are non-radiological constituents present at the Hematite site which may be commingled with and interact with the radiological materials. Therefore, the overall site remediation must take into account both radiological and non-radiological constituents and can proceed only when all necessary regulatory reviews and approvals are obtained. This process is ongoing.

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- A number of elements of the site remediation can only be finalized after other elements of the program are begun (e. g. groundwater remediation and whether buildings will be left onsite).

Based on these factors, the requested alternate schedule is warranted.

Revision 2 of the Decommissioning Plan is responsive to the Commission's initiative to allow more realism and flexibility in the decommissioning process while still preserving the health and safety of the public. The approach discussed therein uses a reasonable and cost effective approach that complies with NRC requirements. While Westinghouse believes that it has justified the use of its approach, it recognizes that the NRC initiative is ongoing and in its early stages, and will be guided by NRC's review.

After examining a number of potential exposure scenarios for the Hematite site, Westinghouse has identified two different applicable scenarios. For the approximately 10-acre central tract area where the licensed activities historically occurred, Westinghouse is proposing an industrial use scenario. On the remainder of the site, representing most of the area of the Hematite site, a residential gardener use scenario leading to unrestricted release is presented. This proposal is based on:

- the heterogeneous nature of the material in the pits;
- the location of the pits in relation to groundwater;
- the lack of complete documentation of the material in the Burial Pits;
- the presence of non-radiological hazardous material;
- the inability to characterize without essentially removing most of the material; and,
- regulatory considerations.

Also being submitted with the Decommissioning Plan are the following:

- Environmental Report for Hematite Site Decommissioning, Revision 0 (DO-05-001)
- Decommissioning Plan Checklist (NUREG-1757, Appendix D), Revision 2 (DO-04-003)
- Derivation of Site Specific Soil DCGLs (Resident Gardener), Revision 2 (DO-04-012)
- Soil Survey Plan, Revision 2 (DO-04-006)

The following documents supporting Revision 2 of the Decommissioning Plan are still being finalized and will be submitted by September 30, 2005:

- Derivation of Site Specific Soil DCGLs (Industrial Release), Revision 0 (DO-05-002)
- Derivation of Site Specific DCGLs for Building Release, Revision 0 (DO-05-003)
- Derivation of Site Specific DCGLs for Groundwater, Revision 0 (DO-05-004)

As the NRC has discussed with Westinghouse, the relative short delay in submittal of these documents and their limited subject matter should not result in any significant delay in the NRC acceptance review process.

If you have any additional questions concerning this submittal, please contact me at (314) 810-3361.

Regards,

H. A. Sepp
Director, Decommissioning

Enclosures:

Six (6) CD-ROMs containing five (5) reports in PDF file format

cc: G. M. Vytlacil, Westinghouse, Licensing Manager (no enclosure)
A. Joseph Nardi, Westinghouse, Supervisory Engineer (no enclosure)
James Cameron, NRC RIII (no enclosure)
Gene Bonano, NRC RIII
Ben Moore, MDNR

Westinghouse Electric Company
Hematite Facility
3300 State Road P
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August 31, 2005

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Regards,

Gordon M. Vytlacil
Licensing Manager
Electronically Approved in EDMS 2000

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