



ENERCON SERVICES, INC.
An Employee Owned Company

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United States Nuclear Regulatory Commission
Attn: Marjorie McLaughlin
Decommissioning Branch
Division of Nuclear Materials Safety
475 Allendale Road
King of Prussia, PA 19408

SM B-1541
04008980

Dear Ms. McLaughlin:

ENERCON Services Inc. (ENERCON) is providing this opinion of the locations of sampling and remediation activities at the Heritage Minerals Inc (HMI) at your request. The specific question under consideration is whether the location of ORISE samples 11 through 13 shown on Figure 24 of the ORISE report dated March 2002 are inside or outside the footprint of the former monazite pile. The monazite pile was remediated by Radiation Safety Inc in 2001, and the ORISE inspection and report was subsequent to that work. Neither Enercon nor HMI have detailed location measurements for these samples. RSI is no longer in business, and we are therefore unable to obtain additional records from them.

It is our understanding that remediation of the monazite occurred sequentially in the following steps:

- removing the monazite pile down to grade within the fenced-in area
- removing an additional quantity of material below grade within the fenced-in area,
- evaluating/removing some material near grade outside the fenced-in area in conjunction with removal of the fence

Neither ENERCON nor HMI has sample data from the verification samples that were taken during this remediation process, but excavation continued within the fenced-in area because surface samples were not below 10 pCi/g. It is HMI's opinion that these samples, while exceeding 10 pCi/g, were significantly below the concentrations of ORISE Samples 11 through 13 (total Thorium from 660 to 1,540 pCi/g and total Uranium from 97 to 120 pCi/g). It is the opinion of both ENERCON and HMI that the locations of ORISE Samples 11 to 13 were outside the fenced-in area that was the footprint of the monazite pile.

If you have any questions, please don't hesitate to call me.

Sincerely,

Gerald E. Williams
Project Manager

GEW:dmm

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