



Westinghouse

Westinghouse Electric Company  
Hematite Facility  
3300 State Road P  
Festus, MO 63028

December 7, 2004

Mr. Amir Kouhestani  
U.S. Nuclear Regulatory Commission  
One White Flint North  
11555 Rockville Pike  
Mail Stop T7 F27  
Rockville, MD 20852-2738

Subject: Priority Request for Amendment to Chapter 3 Section 3.2.2 of SNM-33

Reference: (1) SNM-33, Chapter 3

Dear Mr. Kouhestani:

The purpose of this letter is to request a license amendment to Chapter 3 of SNM-33 (Reference 1) to change the ventilation requirements for work in the building complexes at the Hematite Facility. The revision to Chapter 3, Section 3.2.2, pages 3-3 and 3-4 is enclosed. This is a priority for the site and we ask timely review of the amendment. To assist in continuing with site work activities we ask that the amendment request be approved by January 30, 2005. We have found that meeting the existing requirements, which were established around an operating plant with consistent processes, is unnecessary and it is difficult to demonstrate compliance. Under decommissioning operations it is necessary to maintain flexibility that addresses the specific activities to be conducted which can change on a frequent basis.

This amendment application is necessary because the current ventilation requirements of the license, which were established for and are applicable to uranium processing operations, are not applicable to decommissioning operations. The ventilation requirements of the license have been modified to represent current equipment removal activities. Specifically, the requirement to maintain airflow from low contamination areas to high has been removed. During decommissioning, the active work areas change on an almost daily basis. The needs for contamination control and ventilation are addressed in the radiation work permit process which establishes the controls necessary, including ventilation, as appropriate. The revised amendment being submitted also allows for localized ventilation and removes the requirement to only use dioctylphthalate (DOP) for leak tests. Lastly, this amendment sets the requirement to maintain at least one building exhaust operational until the ventilation system is removed.

Please note, the only change to page 3-4 was to relocate the ventilation requirements to page 3-3 and Section 3.2.3 has not been modified with the exception of the update to reference the RSO per Amendment 43.

This application is in accordance with the regulatory requirements of 10 CFR 20.1101(b). The purpose of the application is to provide procedures and engineering controls based on sound

radiation protection principles commensurate with the scope and extent of licensed activities and sufficient to ensure that occupational doses and doses to the members of the public are as low as reasonably achievable. The activities being conducted during this phase of decommissioning are consistent with those that occurred during operations. The issuance of this amendment will not result in a change in operations or equipment that would:

1. Result in a significant change in the types or significant increase in the amounts of effluents that are released offsite,
2. Result in a significant individual or cumulative occupational radiation exposure,
3. Result in a significant construction impact, or
4. Result in a significant increase in the potential for or consequences from radiological accidents.

Therefore, in accordance with the provisions of 10 CFR 51.22(c)(1) the requested action is eligible for a categorical exclusion and should not require an environmental review.

If you have any additional questions concerning this request, please feel free to contact me at (314)810-3306.

Regards,

Karen Ann Craig  
Manager, Regulatory and Licensing

cc: Hank Sepp  
Joe Nardi

Enclosures: 1 copy of Page 3-3, Revision 1 and 1 copy of Page 3-4, Revision 3 of SNM-33

*Electronically Approved in EDMS 2000*

### 3.2.2 Ventilation

Building ventilation, hoods, glove boxes or local exhaust shall be used as appropriate to control contamination and airborne concentrations. Bulk quantities of uranium powders will be handled in ventilated enclosures having sufficient air flow to assure minimum face velocities of 100 fpm or be under localized ventilation. Contaminated materials and equipment will be dismantled in place using appropriate controls and local ventilation, if needed. Face velocities of ventilated enclosures will be checked weekly, except during periods when the ventilated enclosure is not in use. High Efficiency Particulate Air (HEPA) filters and pre-filter banks are provided with differential pressure gauges for diagnostic purposes. For building ventilation system filter banks, filters/ prefilters will be changed if the differential pressure across the filter exceeds six (6) inches of water, or as recommended by the manufacturer if less than 6 inches. HEPA ventilation systems shall be leak tested in place after any disturbance of the HEPA filters.

Air which is recycled in the contamination control areas shall be passed through HEPA filters and monitored. Monitoring will be accomplished by use of continuous air monitors, or alternately by continuous sampling and analysis at the end of each sampling period.

At least one building exhaust will be maintained operational until the ventilation system is disassembled. Exhaust stacks shall be continuously sampled when in operation.

### 3.2.3 Work - Area Air Sampling

#### 3.2.3.1 Air Sampling Criteria

Air sampling shall be performed using fixed location samplers, personal (lapel) samplers, and air monitors:

The type of air sample collected at a specific operation or location shall depend on the type, frequency, and duration of operations being performed. One or more of these sample methods shall be employed at intervals prescribed by the RSO. General criteria for sampling are: