

March 9, 2006

Mr. Mike McCann
U.S. Nuclear Regulatory Commission
Region III
2443 Warrenville Road
Suite 210
Lisle, IL 60532-4352

Battelle
The Business of Innovation

505 King Avenue
Columbus, Ohio 43201-2693
(614) 424-6424 Fax (614) 424-5263

Subject: Submittal of the Battelle Memorial Institute Position on Radiological Conditions of Groundwater at the West Jefferson North Site under the NRC SNM-7 License

Dear Mr. McCann:

This letter is being written to document Battelle Memorial Institute's (Battelle's) position on the radiological conditions of groundwater at the West Jefferson North Site. Battelle has met the groundwater criteria for drinking water and for non-drinking water at the Site. These criteria include first as per the Decommissioning Plan – Battelle Memorial Institute Columbus Operations, Revision 5 – Attachment 3 "*Volumetric Release Criteria Technical Basis Document*"):

- 10CFR20 Appendix B Table 2 Column 2 for non-drinking water ground water layers

And secondly the West Jefferson Site Environmental Monitoring Plan for Battelle Columbus Laboratories Decommissioning Project, Revision 1 for:

- 40CFR 141(US EPA)for the West Jefferson Site's three drinking water wells.

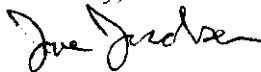
The foundation of this position is Battelle's comprehensive groundwater radiological monitoring program for the West Jefferson North Site, which has been in place since 1990. The results of the ground water monitoring program have been tabulated and presented in the annual Battelle Columbus Laboratories Decommissioning Program (BCLDP) Site Environmental Report for a number of years; this Report has had wide distribution to various DOE, NRC, and EPA offices.

Other monitoring and evaluation activities have been conducted as part of the Site surveillance and maintenance program. Two caisson wells located inside the JN-1B Facility have had documented routine radiological sampling performed for a number of years, with the data that was generated reviewed by the Site health physics staff. In calendar years 2002 and 2003, Battelle conducted a study to verify groundwater flow conditions in preparation for active decommissioning of site structures. During that on-site well drilling campaign, and prior to subsequent abandonment, radiological sampling of the constructed wells was conducted and the radiological data generated reviewed by the Site health physics staff for compliance with 10CFR20 Appendix B Table 2 Column 2 criteria.

Battelle plans on continuing with the radiological monitoring of the existing groundwater monitoring wells on the Site identified in the groundwater monitoring program through the license termination process, which is eminent. Battelle has no plans to expand its ground water monitoring program or study Site groundwater conditions any further prior to submitting the NRC Form 314 request for license termination as an unrestricted release site, as currently planned in April of 2006.

If you have any questions or comments concerning this position, please do not hesitate to call me at 614-424-4098.

Sincerely,



Joe Jacobsen

BCLDP Radiation Safety Officer

RECEIVED MAR 13 2006

March 9, 2006

Mr. Mike McCann
U.S. Nuclear Regulatory Commission
Region III
2443 Warrenville Road
Suite 210
Lisle, IL 60532-4352

Battelle
The Business of Innovation

505 King Avenue
Columbus, Ohio 43201-2693
(614) 424-6424 Fax (614) 424-5263

Subject: Submittal of the Battelle Memorial Institute Position on Radiological Conditions of Groundwater at the West Jefferson North Site under the NRC SNM-7 License

Dear Mr. McCann:

This letter is being written to document Battelle Memorial Institute's (Battelle's) position on the radiological conditions of groundwater at the West Jefferson North Site. Battelle has met the groundwater criteria for drinking water and for non-drinking water at the Site. These criteria include first as per the Decommissioning Plan - Battelle Memorial Institute Columbus Operations, Revision 5 - Attachment 3 "*Volumetric Release Criteria Technical Basis Document*");

- 10CFR20 Appendix B Table 2 Column 2 for non-drinking water ground water layers

And secondly the West Jefferson Site Environmental Monitoring Plan for Battelle Columbus Laboratories Decommissioning Project, Revision 1 for:

- 40CFR 141(US EPA)for the West Jefferson Site's three drinking water wells.

The foundation of this position is Battelle's comprehensive groundwater radiological monitoring program for the West Jefferson North Site, which has been in place since 1990. The results of the ground water monitoring program have been tabulated and presented in the annual Battelle Columbus Laboratories Decommissioning Program (BCLDP) Site Environmental Report for a number of years; this Report has had wide distribution to various DOE, NRC, and EPA offices.

Other monitoring and evaluation activities have been conducted as part of the Site surveillance and maintenance program. Two caisson wells located inside the JN-1B Facility have had documented routine radiological sampling performed for a number of years, with the data that was generated reviewed by the Site health physics staff. In calendar years 2002 and 2003, Battelle conducted a study to verify groundwater flow conditions in preparation for active decommissioning of site structures. During that on-site well drilling campaign, and prior to subsequent abandonment, radiological sampling of the constructed wells was conducted and the radiological data generated reviewed by the Site health physics staff for compliance with 10CFR20 Appendix B Table 2 Column 2 criteria.

Battelle plans on continuing with the radiological monitoring of the existing groundwater monitoring wells on the Site identified in the groundwater monitoring program through the license termination process, which is eminent. Battelle has no plans to expand its ground water monitoring program or study Site groundwater conditions any further prior to submitting the NRC Form 314 request for license termination as an unrestricted release site, as currently planned in April of 2006.

If you have any questions or comments concerning this position, please do not hesitate to call me at 614-424-4098.

Sincerely,



Joe Jacobsen

BCLDP Radiation Safety Officer

emp: 539201 10MAR06

TRK# 8546 0209 5836 FORM 0215

Deliver By: 13MAR06 A2

DEX Letter
press

60532 -IL-US

ORD
NC ENLA

nit: 8 Ounce



on Contents
57

Decl

Information

00 **FedEx** US Airbill Express
FedEx Tracking Number 8546 0209 5836

RECIPIENT: PEEL HERE

1 From This portion can be removed for Recipient's records.
 Date 3/8/06 FedEx Tracking Number 854602095836
 Sender's Name Joe Jackson Phone 614 424-4098
 Company BATTELLE COLUMBUS LABS
 Address 1425 STATE ROUTE 142 NE
 City WEST JEFFERSON State OH ZIP 43162

2 Your Internal Billing Reference

3 To Recipient's Name Mike McLenn Phone 630 875-9856
 Company U.S. NRC - Region III
 Recipient's Address 2443 Warrenville Rd. Suite 210
 Address Lisle State IL ZIP 60532-4352

Recipient's Copy

4a Express Package Service
 FedEx Priority Overnight
 FedEx Standard Overnight
 FedEx First Overnight
 FedEx 2Day
 FedEx Express Saver

4b Express Freight Service
 FedEx 1Day Freight
 FedEx 2Day Freight
 FedEx 3Day Freight

5 Packaging

6 Special Handling
 SATURDAY Delivery
 HOLD Weekday at FedEx Location
 HOLD Saturday at FedEx Location

Does this shipment contain dangerous goods?
 No Yes
 Dry Ice Cargo Aircraft Only

7 Payment Bill to:
 Sender Recipient Third Party Credit Card Cash/Check

Total Packages Total Weight Total Charges



8546 0209 5836

0323391470

8 NEW Residential Delivery Signature Options

No Signature Required
 Direct Signature
 Indirect Signature

519