



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SEP 14 1990

Docket No. 40-7102

Ms. Donna Gaffigan
Bureau of Federal Case Management
State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
401 East State Street
CN-028
Trenton, New Jersey 08625-0028

Dear Ms. Gaffigan:

SUBJECT: COMMENTS ON LETTER TO SHIELDALLOY REGARDING CHARACTERIZATION PLAN

We appreciate your allowing us to comment on the letter to Shieldalloy containing the coordinated comments from NRC, EPA, and NJDEP regarding Shieldalloy Metallurgical Corporation's (SMC) radiological characterization plan for their Newfield, New Jersey site. Our suggested changes and corrections are listed below by the item number they relate to in the proposed letter.

Item 7 (last paragraph).

It is in SMC's best interest to have the grid system accurately surveyed and established by a certified land surveyor. This is not a requirement; however, the grid system must be established so that it can be readily re-established at future dates.

Item 9.

The word "tantalum" should be changed to "thallium" (the correct element for the abbreviation TL). This should also be changed in SMC's plan.

Item 15.

In the last sentence, the expression "results in the" would be better replaced with "requires an."

Item 22.

Federal Register documents are usually referenced by page number. Therefore, NRC's Branch Technical Position should be 46 FR 52061. The number for the second reference should also be changed as appropriate.

SEP 14 1990

Ms. Donna Gaffigan

- 2 -

Item 24.

For analysis of samples containing licensed radioactive material (e.g., contamination resulting from SMC's NRC-licensed operations), the laboratory must have either an NRC license or an NRC-Agreement State license; otherwise, the laboratory must restrict itself to dealing with exempt concentrations and quantities as specified in 10 CFR Part 30.

We hope you find these comments useful. If you have any questions, feel free to call me at (301) 492-0667.

Sincerely,

Original Signed By

Gary C. Comfort, Jr.
Advanced Fuel and Special
Facilities Section
Fuel Cycle Safety Branch
Division of Industrial and
Medical Nuclear Safety, NMSS

Distribution:

Docket No. 40-7102
NRC File Center
NMSS R/F
IMSB R/F
IMAF R/F
GComfort
JSwift
FBrown
Region I
LBettenhausen, RI

(COMMENTS ON NJ LETTER TO SMC)

OFC	:IMAF	:IMB	:IMAF
NAME	:GComfort:jc	FBrown	:JSwift
DATE	:9/14/90	:9/14/90	:9/14/90

OFFICIAL RECORD COPY