



THE HOMER LAUGHLIN CHINA CO.

ESTABLISHED 1871

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SUB-0081
04001957

March 13, 2007

Mr. John Nicholson
Division of Nuclear Materials Safety
US Nuclear Regulatory Commission – Region 1
475 Allendale Road
King of Prussia, Pennsylvania, 19406

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REGION 1
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Subject: Disposal of Unimportant Quantities of Source Material

Dear, Mr. Nicholson,

The Homer Laughlin China Company would like to take advantage of 10 CFR 40.13(a) to treat residual wastes at it's Newell, WV facility as "unimportant quantities" of source material. These wastes resulted from the use of uranium glaze in the historical production of ceramic tableware. These residual wastes contain, on average, levels of uranium (natural or depleted) below 0.05% by weight. Characterization data has been included in Attachment 1. Additionally, under 10 CFR 40.13 (c)(2)(i), glazed ceramic tableware is considered an "unimportant quantity" provided the tableware does not contain greater than 0.20% by weight uranium.

Homer Laughlin intends to use this classification to transfer these residual wastes to the Waste Control Specialists (WCS) facility in Andrews, Texas for disposal. As appropriate, these materials will be blended to assure that each shipment meets the definition of "unimportant quantities" of source material. Transfer of these materials will be conducted consistent with WCS license conditions. Disposal of materials will utilize micro-encapsulation to meet appropriate lead disposal requirements.

Approval of this request is consistent with the NRC proposed changes to Part 40 (Federal Register of August 28, 2002, pgs 55175-55179) and the Commission's memorandum dated January 17, 2007, "Staff Requirements – Briefing on the Status of Decommissioning Activities, 1:30 P.M., December 11, 2006"(Reference MO61211). Homer Laughlin requests timely review and approval of this request so that disposition of this waste material can be completed.

Please contact Mr. Glenn Bouscher @ (304)- 387-1300 ext 447 or gbouscher@hlchina.com if you require any additional information.

Sincerely,

A handwritten signature in cursive script that reads "Glenn Bouscher".

Glenn Bouscher
Director of Purchasing

ATTACHMENT 1
2006 Homer Laughlin China Company Characterization Data

Container ID	Container Type	Date	Uranium Content (µCi)	Uranium (pCi/g U-238)	TCLP Lead (µg/L)	PCB (µg/kg)	Top Contact Doserate (µR/hr)	Front Contact Doserate (µR/hr)	Front 1-ft Doserate (µR/hr)	% Full	Contents
HL-01	B-25	11/1/2006	90.30	94	170000	61	11	10	10	95%	Filter dust, metal components, beams, sheeting, chains
HL-02	B-25	11/1/2006	90.30		194000	24	12	10	10	95%	Metal sheeting, beams, PPE, plastic, rubber hose, insulation, cardboard
HL-03	B-25	11/1/2006	90.30		180000	120	10	8	8	95%	Metal beams, sheeting, gears, fan component, filter dust
HL-04	B-25	11/1/2006	90.30		690	61	7	7	7	100%	Metal beams, filter dust, plastic, metal wood
HL-05	B-25	10/31/2006	90.30		5980	55	8	10	10	95%	Various metal, PPE, concrete dust
HL-06	B-25	11/1/2006	90.30		213000	55	8	7	7	95%	Metal sheeting, dust, chains, misc components, grating
HL-07	B-25	11/1/2006	90.30		114000	45	9	7	7	95%	Metal sheeting, pipng, PPE
HL-08	B-25	11/1/2006	90.30		63200	120	14	10	10	95%	Metal sheeting, beams, components, filter dust
HL-09	B-25	11/1/2006	90.30	94	7210	80	8	8	8	95%	Metal pipes/sheeting/beams, plastic, demolition dust, filter dust
HL-10	B-25	11/1/2006	90.30		195000	53	10	10	8	95%	Metal sheeting, beams, components, dust
HL-11	B-25	11/1/2006	90.30		706	84	10	10	10	95%	Metal sheeting, beams, components, dust
HL-12	B-25	10/31/2006	90.30		27500	37	10	10	10	95%	Various metal, PPE, dust
HL-13	B-25	10/31/2006	90.30		22200	89	10	10	10	95%	Various metal, PPE, concrete dust
HL-14	B-25	10/31/2006	90.30	94	60400	56	10	10	10	95%	Wood scrap, wood dust, PPE, metal
HL-B-58	Wood Box	11/1/2006		104	22700	240	9	9	9	95%	Metal components, misc
HL-B-59	Wood Box	11/1/2006		104	22700	240	12	9	9	95%	Molds, brick, HEPA filter, plastic, rope, particle board
HL-MX-15	B-25	11/1/2006	90.30		108000	0	12	10	10	95%	Wood brick, paper, plastic
HL-MX-16	B-12	11/1/2006	45.00		10800	170	14	10	8	95%	HEPA filter, plastic, ACM bag, HEPA hose, misc remediation debris
HL-MX-17	Wood Box	11/1/2006		52	25300	98	10	9	9	95%	Wood bricks
HL-D-30	Drum	10/31/2006	3.14		408	7	14	19	16	95%	Concrete bricks
HL-D-31	Drum	10/31/2006	3.14		1480	190	17	20	17	90%	Concrete bricks
HL-D-32	Drum	10/31/2006	3.14		56	6	20	25	22	100%	Concrete blocks
HL-D-33	Drum	10/31/2006	3.14			7	18	25	20	85%	Concrete blocks, plastic, metal beams
HL-D-34	Drum	10/31/2006	3.14			154	22	30	20	100%	Concrete blocks
HL-D-35	Drum	10/31/2006			14600	6	14	20	16	90%	Concrete rubble
HL-D-36	Drum	10/31/2006	3.14			6	14	16	14	100%	Concrete brick, small amount concrete dust
HL-D-37	Drum										
HL-D-38	Drum	10/31/2006	3.14			6	25	25	25	95%	Concrete blocks
HL-D-39	Drum	10/31/2006	4.34		1480	190	25	25	20	90%	Wood 2x8, metal beams, PPE
HL-D-40	Drum	10/31/2006	7.10		1490	7	18	20	16	95%	Scabble debris
HL-D-41	Drum	10/31/2006	3.14		1100	7	20	20	18	95%	Concrete & brick
HL-D-42	Drum	10/31/2006	3.14		1010	6	18	20	18	95%	Concrete block
HL-D-43	Drum	10/31/2006	3.14			7	25	25	20	100%	Concrete block
HL-D-44	Drum					8					
HL-D-45	Drum	10/31/2006	3.14		1120	1620	24	25	22	100%	Scabble concrete chips, concrete debris
HL-D-46	Drum	10/31/2006	2.77		97	7	16	24	18	100%	80% Wooden blocks, scabbled concrete debris
HL-D-47	Drum	10/31/2006	8.37		139	7	18	20	15	95%	Concrete block
HL-D-48	Drum	10/31/2006			9940	150	16	20	18	90%	Concrete scabble, dust, debris
HL-D-49	Drum	10/31/2006	3.14		14300	100	80	80	40	100%	Wood blocks, plastic, dust, saw dust
HL-D-49A	Drum	10/31/2006	4.75		132000	390	12	12	12	90%	Wood, wood chips, wood dust, metal sheeting
HL-D-50	Drum	10/31/2006	7.10		1480	190	17	22	18	70%	Vacuum bags, debris
HL-D-51	Drum	10/31/2006	2.50		26200	6	16	20	20	90%	Wood
HL-D-52	Drum	10/31/2006	7.10			990	16	22	20	80%	Vacuum bags, debris
HL-D-53	Drum	10/31/2006	4.50			500	18	15	15	90%	Concrete scabble debris, wood
HL-D-54	Drum	10/31/2006	3.50		1480	190	18	20	18	90%	Concrete scabble
HL-D-55	Drum	10/31/2006	4.50		56	393	20	20	18	99%	Vacuum bags

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HL-D-56	Drum	10/31/2006	3.50		16700	120	10	10	10	95%	Plastic, vacuum bags
HL-D-57	Drum	10/31/2006	3.50		46200	100	12	12	12	95%	Concrete dust, metal, plastic, china
HL-D-57A	Drum	10/31/2006	3.14			7	14	16	14	95%	Scabbled concrete chips
HL-D-60	Drum	10/31/2006	3.00		19000	71	12	10	10	95%	PPE, misc debris, HEPA hose, insulation
HL-D-61	Drum	10/31/2006	3.00		307000	42	12	10	10	80%	HEPA filter, plastic
HL-D-62	Drum	10/31/2006			350	7	20	25	20	100%	Bricks, dust, scabbled concrete
HL-D-67	Drum	10/31/2006		104000*	0	5	800	2400	800	100%	Concrete rubble (greenish hue), PPE, plastic
HL-MX-18	Drum	10/31/2006	8.14		72	5	22	40	20	90%	Concrete
HL-MX-19	Drum	10/31/2006	8.00		11400	7	20	20	20	95%	Concrete rubble
HL-MX-20	Drum	10/31/2006	8.14				20	30	22	95%	Concrete
HL-MX-21	Drum	10/31/2006	3.14				120	100	40	95%	Concrete
HL-MX-22	Drum	10/31/2006	3.14		57	7	16	30	20	85%	Concrete rubble
HL-MX-23	Drum	10/31/2006	8.00		6650		18	30	20	90%	Concrete
HL-MX-24	Drum	10/31/2006	3.14		223		23	30	20	95%	Concrete
HL-MX-25	Drum	10/31/2006	3.14			6	20	20	15	90%	Concrete rubble
HL-MX-26	Drum	10/31/2006	3.14			48	20	30	20	95%	Concrete
HL-MX-27	Drum	10/31/2006	3.14		290	5	22	22	20	95%	Concrete rubble
HL-MX-28	Drum	10/31/2006	3.14			5	22	30	20	98%	Concrete
HL-MX-29	Drum	10/31/2006	4.70		237	7	20	28	20	85%	Concrete rubble
HL-MX-63	Drum	10/31/2006			31100		18	15	15	90%	Wood block
HL-MX-64	Drum	10/31/2006			46000	50	15	25	20	90%	Wood blocks
HL-MX-65	Drum	10/31/2006		7	14600	12	15	12	12	80%	Wood blocks, granular material (absorbent?)
HL-MX-66	Drum	10/31/2006		**	0	8	230	1200	600	75%	Concrete chips, dust, metal canister, PPE, metal
RS-1	Drum	10/31/2006		63	11300	86	11	11	11	60%	Wood block
RS-2	Drum	10/31/2006		207000*	153	480	30	140	60	50%	Carboy, debris
RS-3	Drum	10/31/2006			24600	204	14	12	12	75%	Concrete, brick rubble, china, cardboard
RS-4	Drum	10/31/2006		71	195000	180	15	18	15	90%	Wood block
RS-5	Drum	10/31/2006			8580	120	14	15	15	75%	Wood block
RS-6	Drum	10/31/2006			163000	350	11	11	11	90%	Wood block

* - Sample collected from glaze material of concrete block / metal carboy. Source term volume very small compared to total container volume.

** - Source term is glaze material on metal canister. Source term volume small compared to total container volume.