

**APPENDIX C**  
**ENERGY SOLUTIONS REMEDIAL WORK PLAN**



November 9, 2006  
Ref. No. 137052-001

Mr. John Chapman, CPG  
Senior Project Manager  
Partners Environmental Consulting, Inc.  
31100 Solon Road  
Suite G  
Solon, OH 44139

Dear Mr. Chapman:

EnergySolutions, LLC is pleased to provide you with four (4) controlled copies of the Remedial Work Plan for the AAR Manufacturing, Inc. project in Livonia, MI.

EnergySolutions, will forward you the document transmittal form to indicate receipt of your controlled copies under separate cover.

If you have any questions, please contact me at (864) 235-3694.

Sincerely,

A handwritten signature in black ink, appearing to read "Ken M. Kasper".

Kenneth M. Kasper, RRPT, CHP, CIH  
Technical Director

KMK:pm  
Enclosure

Cc: B. Koh w/attachments  
G. Toumey w/attachments  
G. Parkhurst w/attachments  
D. Vann w/attachments

**REMEDIAL WORK PLAN  
WASTE EXCAVATION AND SITE RESTORATION  
AAR MANUFACTURING, INC. (FORMER BROOKS AND PERKINS) SITE**

**12633 Inkster Rd.  
Livonia, Michigan**

**Revision 0**

Authored By: \*electronic approval on file 11/9/06  
Glenn Parkhurst, Site Supervisor Date

Reviewed By: \*electronic approval on file 11/9/06  
Gerard Toumey, Project Manager Date

Reviewed By: \*electronic approval on file 11/9/06  
Ken Kasper, Date  
General Manager, Engineering & Health Physics

Approved By: \*electronic approval on file 11/9/06  
Lee G. Penney, Operations Manger Date

- New Procedure
- Title Change
- Procedure Revision
- Procedure Rewrite

CONTROLLED COPY No. 780

Effective  
Date 11/9/06

## Revision Log

Revision Number	Affected Pages	CRA Number	Approval
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TABLE OF CONTENTS

Section	Page
1.0 INTRODUCTION .....	5
2.0 OBJECTIVES .....	8
3.0 PROJECT ORGANIZATION .....	10
4.0 RELEASE CRITERIA.....	12
4.1 Survey of Storage Pad.....	12
5.0 SITE EXCAVATIONS.....	13
5.1 Areas, Depths, and Volumes.....	13
5.2 Equipment and Personnel .....	13
5.3 Material Excavation.....	14
5.4 Packaged Material.....	15
5.5 Remediation Support Surveys and Field Screening.....	15
5.6 Equipment Release Surveys.....	15
6.0 WASTE MANAGEMENT .....	16
6.1 Waste Characterization .....	16
6.2 Waste Classification.....	16
6.3 Waste Packaging.....	17
6.4 Waste Staging Areas .....	17
6.5 Waste Containers, Transporters and Disposal Sites .....	17
6.6 Waste Manifesting and Records .....	17
7.0 SUPPORTING DOCUMENTS .....	19
7.1 Site-Specific Health and Safety Plan .....	19
7.2 Implementing Procedures .....	19
8.0 REFERENCES .....	20

**FIGURES**

Figure 1-1 Property Site Location Map .....6  
Figure 1-2 Property Site Layout Map .....7  
Figure 2-1 Proposed Work Schedule .....9  
Figure 3-1 Project Organization Chart .....11

**TABLES**

Table 5-1 Locations to be Excavated .....13  
Table 5-2 Acceptable Surface Contamination Levels .....14

ATTACHMENT 1 Site Map of Locations to be Excavated .....21

## 1.0 INTRODUCTION

The Former Brooks and Perkins manufacturing site located in Livonia, Michigan (the Site) contains radioactive thorium left over from the use of thorium and thorium ores in a manufacturing process. Brooks and Perkins terminated their license on May 17, 1971. A review of the license termination by the Oak Ridge National Laboratory (ORNL) in 1994 discovered remaining amounts of thorium in excess of the U.S. Nuclear Regulatory Commission (NRC) release criteria. The site had been purchased in 1981 by AAR Corporation for use in assembly of aircraft parts. Since 1996, AAR has been in negotiations with the NRC to remediate the site. Partners Environmental has represented AAR in this process and has come to a resolution with the NRC to complete the site remediation.

AAR and Partners proposed removal of six (6) ten (10) meter by ten (10) meter squares to a depth of one (1) meter on the open land west of the buildings. This removal will reduce the average level of residual thorium to acceptable levels as determined and approved by the NRC. The remediation opens the eastern portion of the lot to unrestricted use and reduces the western section to a deed restricted parcel. Included in the scope of work is the removal of legacy waste packaged previously during sampling and decontamination of areas inside the structures.

FIGURE 1-1  
PROPERTY SITE LOCATION MAP

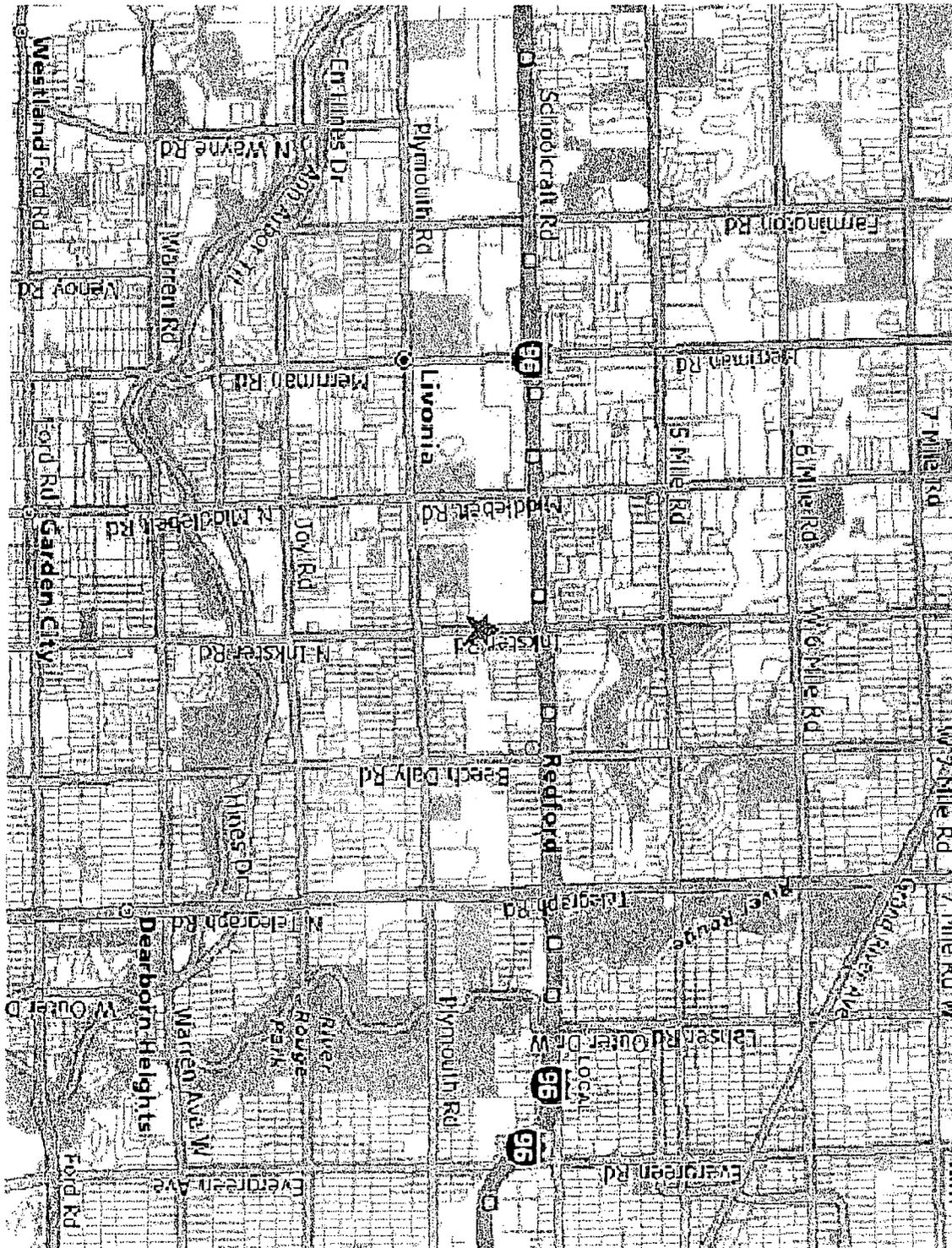
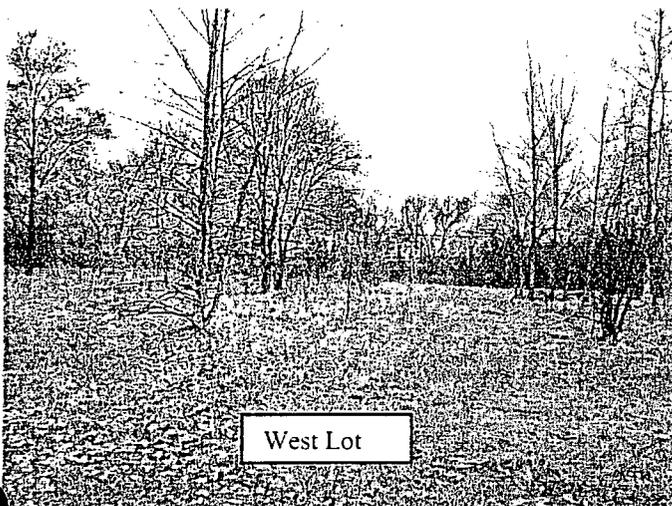
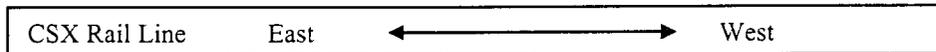
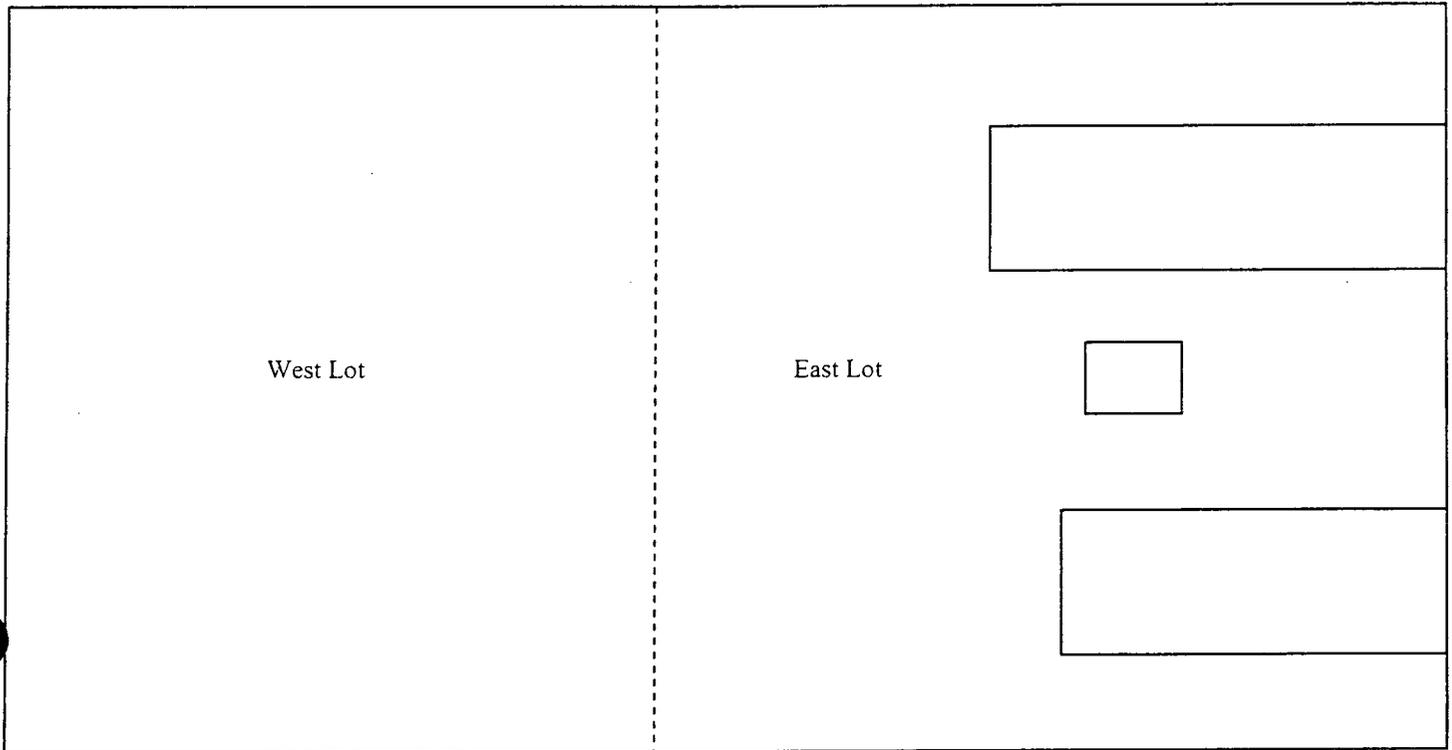


FIGURE 1-2  
PROPERTY SITE LAYOUT MAP



Source: Reference 1

## 2.0 OBJECTIVES

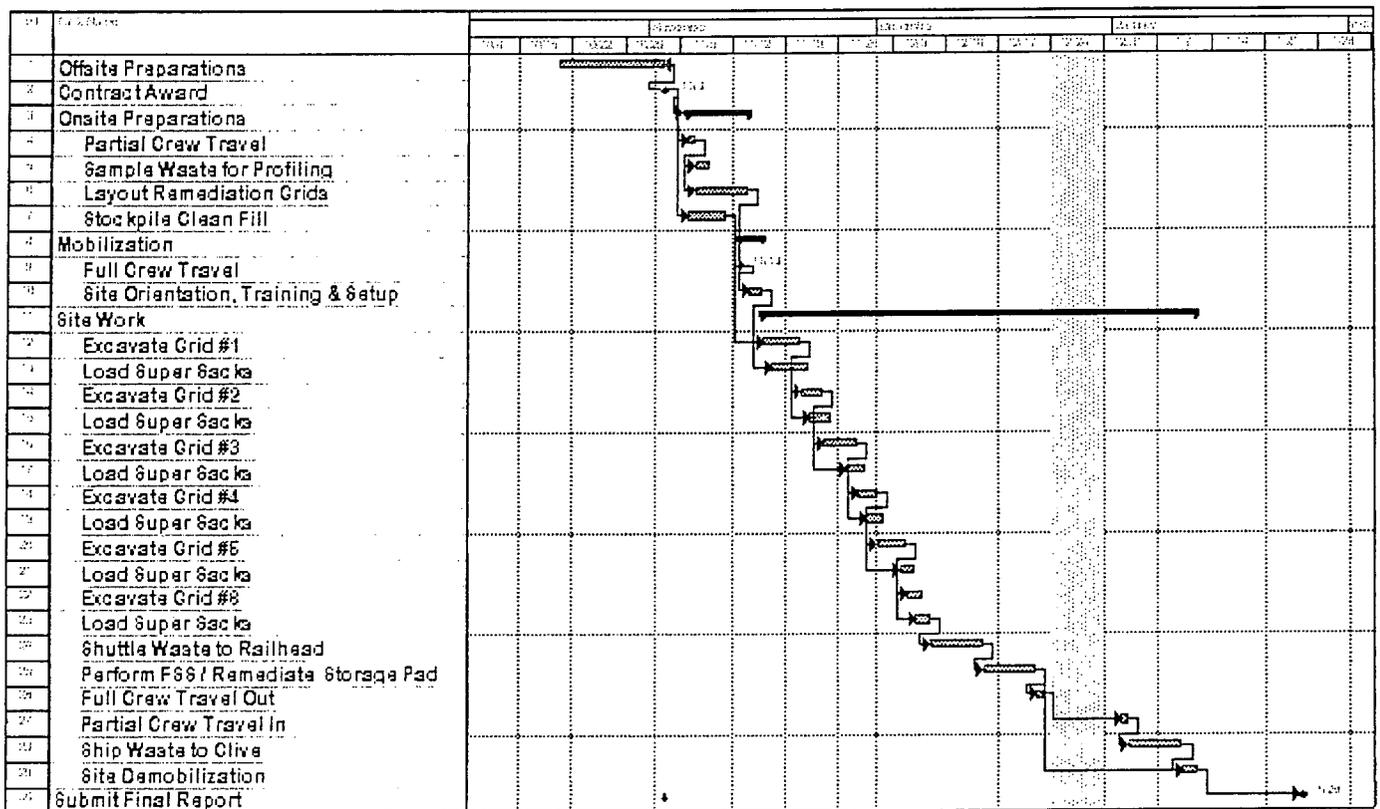
The primary objective of the site remediation project will be to remove six (6) ten by ten meter squares to a depth of one meter of thorium-contaminated soils from the site, and to package and ship the soil along with ninety-two (92) fifty-five gallon drums of soil and seven (7) B-25 boxes of soil and debris from a previous remediation. Included will be the survey and release of the storage pad where the drums and boxes have been staged. These objectives will be accomplished through performing defined excavations at the six designated locations, packaging the excavated soil, and shipping of the legacy drums and boxed waste to the EnergySolutions waste disposal site at Clive, UT.

The onsite work is expected to begin in November 2006. Figure 2-1 provides a projected weekly schedule of the major project tasks. These tasks include the following:

- Mobilization – A field team consisting of a site supervisor, project health physicist, technicians, and equipment operators will travel to the Site. All necessary instruments, equipment and supplies will be delivered. A field office will be set up using existing AAR building space. The project health physicist or designee will provide radiation awareness training to project team members.
- Site Preparations – Site preparation activities will include plotting the pre-designated grids and removing small trees and shrubs as necessary for access to the remedial action areas. The areas will be marked with non-toxic ground paint. Waste material samples will be taken and submitted to an accredited lab to provide analysis for the required disposal waste profile.
- Remediation – Remediation activities will include excavation of the grids and packaging of contaminated soil as required by the August 7<sup>th</sup>, 2006 transmittal to the NRC (Revised Probabilistic Dose Assessment) (Ref. 3).
- Waste Shipments – Excavated contaminated soils, as well as the legacy drums and boxes, will be shipped to the Clive, Utah disposal site. The waste will be transported by truck directly to the Clive site or trans-loaded at a local rail spur for rail transportation to the disposal site. All trucking will be done by certified Hazardous waste haulers.
- Final Status Survey – Excavated grid locations require no FSS as per the Revised Probabilistic Dose Assessment. The Storage Pad will be subjected to a FSS based on the guidance provided in the Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) (Ref. 4).
- Site Restoration – Site restoration activities will include backfilling excavated areas with clean fill and wheel rolling the areas with heavy equipment until grid compaction is roughly equivalent to existing site conditions. Clean fill will be obtained from offsite suppliers, who will document the material to have originated from a site with no known history of hazardous materials.

- Demobilization – The field team will package and ship all equipment and supplies. Site housekeeping will be performed such that no debris or foreign materials arising from the remedial action remains. The project team will travel back to their respective home offices.

FIGURE 2-1  
 WORK PERFORMANCE SCHEDULE



### 3.0 PROJECT ORGANIZATION

The remediation project is being managed by *EnergySolutions*, LLC, Field Services (ESFS), 143 West St., New Milford, CT 06776. The following key *EnergySolutions* personnel will be responsible for the project:

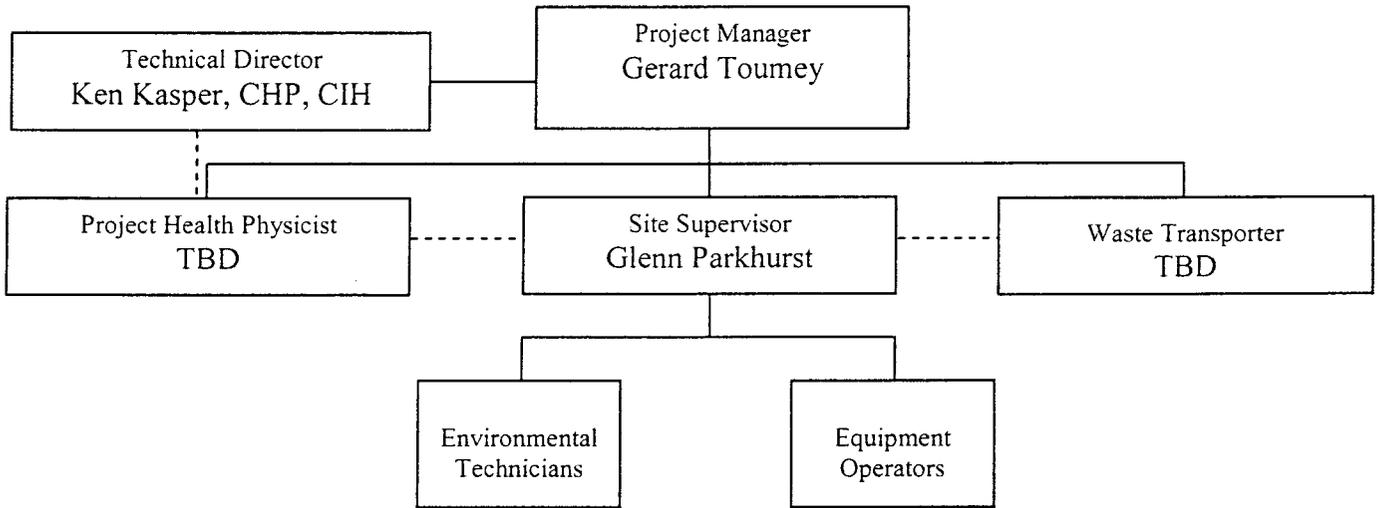
Project Manager – *EnergySolutions* – Gerard Toumey  
Project Health Physicist – *EnergySolutions* – TBD  
Site Supervisor – *EnergySolutions* – Glenn Parkhurst  
Environmental Technicians (2) – *EnergySolutions*  
Equipment Operators (2) – *EnergySolutions*

Figure 3-1 provides the project organization chart. The project manager has the overall responsibility of the project and will control the project budget, set the project schedule, and coordinate field activities with *EnergySolutions* personnel. The project health physicist will be responsible for providing training to the site personnel and ensuring that the appropriate data is being collected to support waste characterization and site release. The site supervisor will be responsible for setting up radiological instrumentation and directing excavations, sampling, and surveys. The site supervisor will also act as the site health and safety officer and, along with the project manager and the project health physicist, has full stop work authority. The environmental technicians and equipment operators will work under the direction of the site supervisor. The environmental technicians and equipment operators should express any concerns first to the site supervisor, but may contact the project health physicist or the project manager directly.

*EnergySolutions* is expected to provide full waste disposal services. The project manager will set up the contract and schedule the waste pickups. The site supervisor will provide on-site assistance to the project manager and waste broker. The site supervisor will maintain records of waste shipments on-site until the end of the project. Upon demobilization, records will be sent to the project manager.

The site supervisor will direct the final status survey (FSS) of the Storage Pad as directed by the FSS Plan. The site supervisor will routinely (daily, if possible) provide copies of instrument records and site survey data to the project health physicist for review.

FIGURE 3-1  
PROJECT ORGANIZATION CHART



#### 4.0 RELEASE CRITERIA

The project derived concentration guideline levels (DCGLs) are as specified in NRC letter dated April 2004 to AAR. The letter states that based on 1999 AAR data and the 2004 ORISE data, three 100 square meter areas exceed the DCGLs. In addition, if the Eastern DCGL is applied to one of the 100 square meter areas on the boundary of the Eastern and Western Parcels, that area would exceed the DCGL. All areas identified in the NRC letter dated April 2004 as exceeding the DCGL will be excavated. In accordance with the Probabilistic Dose Assessment, the goal of the project is to remove 600 cubic meters of soil from six 100 cubic meter grids, and to dispose of the removed and currently-stored material. Once the material is removed, the site is deemed to be acceptable for release as noted in the Revised Probabilistic Dose Assessment (Ref. 2).

##### 4.1 Survey of Storage Pad

This area will be surveyed for removable and fixed contamination using surface contamination monitors (such as alpha-beta dual phosphor detectors, gas-proportional detectors, GM tubes) and micro-REM instrumentation. The Storage Pad will be subjected to a 100% scan and fixed point measurements. Surveys will be performed to ensure that Storage Pad meets the release criteria identified in Table 5-2. No other areas will be subjected to a Final Status Survey

The Storage Pad will be released in accordance with Regulatory Guide 1.86 (Ref. 5). The final status survey of the storage pad will be based on the methods described in the "Multi-Agency Radiation Survey and Site Investigation Manual" (MARSSIM) (Ref. 4). The pad will be a single Class 1 survey unit and, as such, will be subjected to a 100% surface scan and fixed point measurements. Removable contamination will also be evaluated.

Upon removal of the waste material, a scoping survey will be performed on the Storage Pad. This survey will determine the survey unit variability ( $\sigma$ ), which will be used with the MARSSIM process to develop "N", the number of fixed point measurements. The project health physicist, after determining N, will generate a systematic, random-start fixed-point survey pattern. The coordinates and/or map will be provided to the site supervisor. All statistical protocols used in association with the final status survey will be reported in the final status survey report such as the  $\sigma$ , generation of N, the map, etc.

## 5.0 SITE EXCAVATIONS

Based on the Revised Probabilistic Dose Assessment (RPDA) (Ref. 2), six grids measuring 10 meters by 10 meters will be excavated to a depth of one meter. The soil will be packaged and shipped to the Clive, Utah waste disposal site. The removal of this soil will reduce the overall average concentration to a level that will allow AAR to release the eastern parcel without restriction and release the western parcel with deed restrictions. This Work Plan includes the removal of soil and debris associated with a previous remediation inside the AAR facility. This material is stored inside six (6) 55-gallon drums and seven (7) B-25 boxes. There are also eighty-six 55-gallon drums of soil from samples taken during the initial site characterizations.

### 5.1 Areas, Depths, and Volumes

Table 5-1 provides the size and designation of each area and expected volume from each of the confirmed areas defined in RPDA. Attachment 1 of this document shows the locations of these waste areas.

**TABLE 5-1  
LOCATIONS TO BE EXCAVATED**

Waste Area	Size (m <sup>2</sup> )	Estimated Volume (m <sup>3</sup> ) <sup>a</sup>
Grid 118	100	100
Grid 073	100	100
Grid 100	100	100
Grid 219	100	100
Grid 249	100	100
Grid 210	100	100

Note: <sup>a</sup> Excavated volume. Disposal volumes will be approximately 10% greater

On-site excavations are expected to remove the full 10-meter by 10-meter by 1-meter grid. Although most of the excavation is expected to be soil or soil-like material, there is a likelihood that some of the excavation will be concrete chunks or debris dumped in the area during operations by the site's original owner, Brooks and Perkins.

### 5.2 Equipment and Personnel

A local survey company will be contracted to locate the original grids. The project crew will use standard excavating equipment to excavate and backfill as work allows. There will also be heavy equipment for moving the filled bags, drums, and boxes around the site. The rentals will be from local firms and should be delivered to the site by the end of the mobilization period. EnergySolutions may hire local equipment operators as necessary to operate heavy equipment. All personnel will receive radiation protection training as directed by the project health physicist.

The environmental technicians will support the excavation work by performing necessary radiological control surveys. Surveys will be conducted, as necessary, using scaler/rate meters with 2-inch by 2-inch sodium iodide (2x2 NaI). The 2x2 NaI probes will be used to scan surface soils and survey large volumes of soils in containers. Geiger Mueller (GM) pancake probes or phoswich detectors will be used to "frisk" equipment, personnel, waste containers, etc. to ensure that contamination is not being tracked off site. All radiological instruments will be calibrated in accordance with the *EnergySolutions* procedure (Ref. 10).

Because of highly variable surface efficiency factors when counting alpha emissions, only beta emissions will be used to quantify surface contamination. Removable contamination samples (smears) will also be collected and analyzed to assess the level of removable contamination on equipment. Release limits for personnel and equipment are presented in Table 5-2. These values are traditional values originally presented in the NRC Regulatory Guide 1.86. The natural thorium limit will be used.

**TABLE 5-2  
ACCEPTABLE SURFACE CONTAMINATION LEVELS**

Nuclide	Average <sup>a</sup>	Maximum	Removable
Natural Thorium	1,000 dpm/100cm <sup>2</sup>	3,000 dpm/100cm <sup>2</sup>	200 dpm/100cm <sup>2</sup>

Note: <sup>a</sup> Should not be averaged over an area greater than 1 m<sup>2</sup>.

The environmental technician will also use dose rate or exposure rate meters to ensure that general area dose rates are maintained at acceptable levels. General area dose rates over 2 millirem per hour will be reported to the project health physicist. The use of dosimetry is not anticipated; however, requirements for dose monitoring will comply with *EnergySolutions* Field Services (ESFS) Radiation Protection Manual (Ref. 12) and applicable regulations.

Sections 5.5 and 5.6 provide information on the survey and sampling methods.

### 5.3 Material Excavation

Excavations will be performed in a precise manner as to minimize volumes of LLRW. The area will be excavated from the edge to edge to a depth of one meter. Excavated soil will be loaded into soft sided super sacks, installed in a hard frame. Once the bag is filled, it will be closed, labeled, removed from the frame, weighed, and placed in a designated storage area. Surveys will be performed during the excavation to determine the proper classification for waste shipments. Barriers, controlled areas, and decon will be used to prevent tracking excavated soil outside the excavation area for each grid.

Once the excavation is complete, AAR or designated representative will verify the excavated dimensions. No samples or surveys will be done at the base of the excavations. AAR will notify *EnergySolutions* when the excavation may be filled. Once notification is received, *EnergySolutions* will backfill the excavation with clean fill soil. The fill will be compacted by wheel rolling with heavy equipment until grid compaction approximates the existing conditions.

#### 5.4 Packaged Material

Drums will be palletized and banded and relocated to a covered temporary storage area for shipping. Each drum will be inspected, weighed, and labeled for shipping. Drums may be opened as necessary for sampling. Boxes will be inspected, weighed, and labeled. They will also be placed in a temporary storage area.

Once the storage pad is empty, it will be surveyed for contamination. The pad will be decontaminated to the extent practical by non-intrusive methods. The pad will be released in accordance with Table 5-2. Should the pad contamination exceed the limits and decontamination can only be performed by removal of the concrete surface, *EnergySolutions* will notify AAR.

Once all the drums, boxes, and excavations are completed, equipment will be surveyed and released. All waste materials will be shipped to a rail spur for loading into rail cars. The waste will be loaded onto flatbed trailers and transported to the spur using certified hazardous waste transporters. Waste will be manifested by a certified shipper. Original manifests will be maintained by *EnergySolutions*. The waste will be transferred to a waste broker at the trans-load facility (spur) and shipped to the *EnergySolutions* waste disposal site in Clive, UT.

#### 5.5 Remediation Support Surveys and Field Screening

The accepted Probabilistic Dose Assessment is based on removal of specific volumes of soil from specific grids located on the property of AAR. There is no release criteria specified in the dose assessment. No scanning or sampling of excavations will be performed. Surveys will be performed to ensure that Storage Pad meets the release criteria identified in Table 5-2. No other areas will be subjected to a Final Status Survey.

#### 5.6 Equipment Release Surveys

Following appropriate decontamination, equipment that is to be released from the site must be surveyed. This equipment may include, but is not limited to, heavy equipment, hand tools, sampling equipment, survey instruments, etc. The release criteria for equipment release surveys are provided in Table 5-2.

## 6.0 WASTE MANAGEMENT

Excavated materials will be loaded directly into large-volume waste containers such as soil sacks. Drums and boxes, after verification of package integrity, will be shipped as is. Waste material will be surveyed to provide the necessary information to classify the material for shipment. Waste shipments will comply with applicable U.S. Department of Transportation (DOT) regulations. It is anticipated that the bulk of the material will be required to be shipped LSA-I.

**The AAR site is unlicensed for radiological material. EnergySolutions is remediating this site without invoking its U.S. Nuclear Regulatory Commission License (06-20775-01).**

EnergySolutions will obtain the shipping/shielding containers and the appropriate materials handling equipment, and prepare manifests and other hazardous documentation to assure meeting the disposal facility waste acceptance criteria. EnergySolutions will be responsible for brokerage and transport of the radioactive waste and mixed waste, should it exist.

### 6.1 Waste Characterization

The characterization of waste will be directed by the on-site Waste Specialist, who is experienced in all phases of waste management. This specialist will be responsible for the coordination of all waste management activities. The Waste Specialist will be supported by EnergySolutions health physics personnel who will perform radiological surveys and sampling as directed.

Waste generated during the site decommissioning project will be characterized and segregated on site according to separate categories for removal and disposal. These categories will include:

- Class A low-level radioactive waste (LLRW)
- Mixed wastes

The volume of LLRW is estimated at 25,000 cubic feet. The volume of Mixed Waste is estimated at 0 cubic feet.

Waste characterization evaluation will be performed by laboratory analysis. To ensure that waste streams are properly characterized, EnergySolutions will use Severn Trent Laboratories or General Engineering Laboratories for off-site analyses.

### 6.2 Waste Classification

The classification of LLRW as Class A waste will be performed in accordance with 10 CFR 61.55. EnergySolutions will determine the isotopic concentrations of the waste stream through standard gamma spectroscopy protocols.

### 6.3 Waste Packaging

Radioactive and mixed waste material will be packaged for shipment per appropriate regulations, and will be placed into a radioactive materials storage area (staged) until shipped.

After the characterization surveys and sampling are complete, wastes will be wrapped, bagged, and/or containerized and staged in the appropriate designated area. Items and containers will be properly labeled as radioactive material and the label will indicate the external dose rate from the material. Radioactive wastes will be stored, in accordance with ESFS Procedure 82A8052 (Ref. 14), in properly secured radioactive materials storage areas. Waste inventory logs will be maintained for materials placed in disposal and shipping containers.

The entire quantity of waste packages will be staged for shipment and will be shipped in a single shipping campaign at the end of the site remediation. There are no exposure rate issues anticipated from the storage of radioactive materials.

### 6.4 Waste Staging Areas

Radioactive waste will be staged in designated controlled areas in accordance with USNRC 10 CFR 19 and 20 requirements and in accordance with ESFS Procedure 82A8052. Mixed wastes will be staged in designated controlled areas per EPA 40 CFR requirements, 10 CFR 19 and 20, and per local and state permits. Measures will be implemented through project plans and ESFS procedures to control the spread of contamination, limit radiation levels, prevent unauthorized access, prevent unauthorized material removal, prevent tampering, and prevent weather damage.

Radioactive material storage areas will be contained inside posted restricted areas according to existing ESFS procedures, and will be consistent with 10 CFR 20.

### 6.5 Waste Containers, Transporters and Disposal Sites

The waste containers, transporters and disposal site utilized on this project are in accordance with all applicable regulations. Alternate packaging configurations, disposal sites or transportation companies may be substituted as appropriate.

Appropriate documentation will be submitted to designated disposal sites including, as required, certification plans, qualification statements, assessments, waste stream analysis, evaluations and profiles, transportation plans, and waste stream volume forecasts.

### 6.6 Waste Manifesting and Records

Radioactive waste may be manifested using state-of-the-art LowTrack<sup>®</sup> waste management software which is accepted universally by all LLRW disposal sites in the

United States. EnergySolutions Field Services is a licensed user of LowTrack<sup>®</sup> software and maintains an update subscription to ensure the most current forms are used for waste management reporting and tracking activities.

## 7.0 SUPPORTING DOCUMENTS

This Work Plan is supported by the Site-Specific Health and Safety Plan (SHASP) and the *EnergySolutions* radiological implementing procedures briefly described in the following sections.

### 7.1 Site-Specific Health and Safety Plan

The SHASP will address all radiological and non-radiological hazards that may be encountered at the Site. Among other things, the SHASP will define levels of personnel protective equipment and provide emergency medical information. The SHASP must be read and acknowledged by everyone coming on-site during potentially hazardous operations.

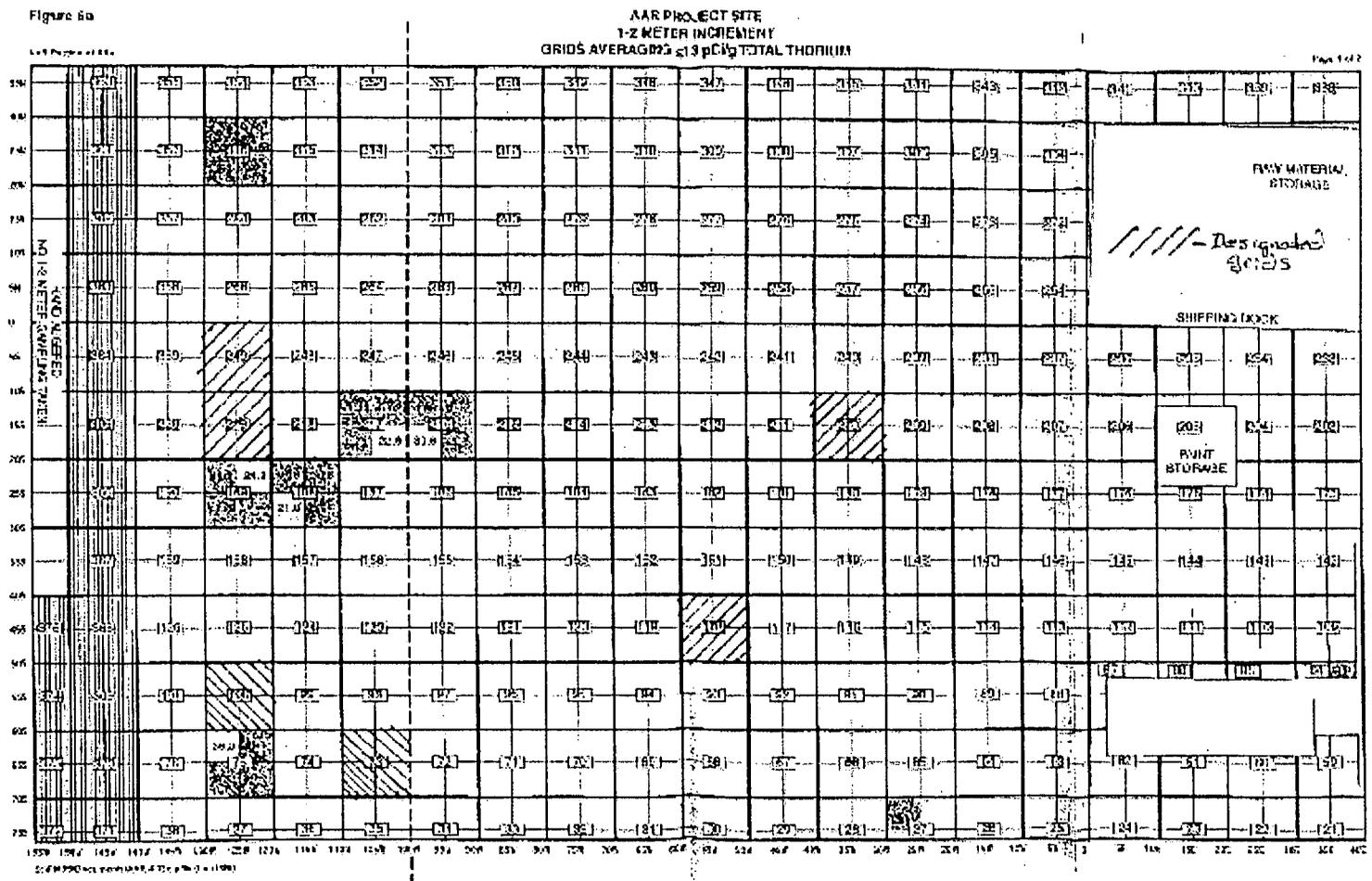
### 7.2 Implementing Procedures

*EnergySolutions* procedures are integral to our US-NRC license and provide the infrastructure for effective radiological controls and personnel protection as referenced in Section 8.0. Although *EnergySolutions*' NRC license is not being used, the procedures that support the license will be used as necessary and appropriate to this project.

## 8.0 REFERENCES

1. Site Characterization Report Phase II, Rev.0. August 1999, B. Koh and Associates.
2. Revised Probabilistic Dose Assessment, June 2005, Partners Environmental.
3. Letter from Partners Consulting, Inc. to Nuclear Regulatory Commission (Brown to Camper), August 7, 2006.
4. U.S. Nuclear Regulatory Commission (NRC) Guide, NUREG 1575, "Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM), Revision 1," August 2000.
5. NRC Regulatory Guide 1.86, "Termination of Operating Licenses for Nuclear Reactors," June 1974.
6. ESFS Document 82A8001 "Document Control Procedure."
7. ESFS Document 82A8008 "General Radiological Survey Procedure."
8. ESFS Document 82A8016 "Radiological Environmental Sample Collection Procedure."
9. ESFS Document 82A8030 "Radioactive Check Source Accountability Procedure."
10. ESFS Document 82A8034 "Calibration of Survey Instruments Procedure."
11. ESFS Document 82A8036 "Radiation Work Permit Procedure."
12. ESFS Document 82A8042 "Radiation Protection Manual."
13. ESFS Document 82A8051 "Radioactive Material Management Program Manual."
14. ESFS Document 82A8052 "Procedure for Handling, Storing, and Characterization of Radioactive Material and LLRW."
15. ESFS Document 82A8053 "Radioactive Material and LLRW Transportation Procedures."

Attachment 1  
Site Map of Locations to be Excavated





# PARTNERS ENVIRONMENTAL

November 14, 2006

Ms. Claudia M. Graig, Chief  
Reactor Decommissioning Branch  
Decommissioning & Uranium Recovery Licensing Directorate  
Division of Waste Management and Environmental Protection  
Office of Federal and State Materials and Environmental Management Programs  
United States Nuclear Regulatory Commission  
Washington, DC 20555-0001

**RE: Remedial Work Plan  
Waste Excavation and Site Restoration  
Former Books and Perkins Site, Livonia, Michigan**

Dear Ms. Craig:

Partners Environmental Consulting, Inc. (Partners) is pleased to submit for your information the Remedial Work Plan for remediation activities to be undertaken at the former Brooks and Perkins Site located in Livonia, Michigan. This plan has been prepared consistent with the Revised Probabilistic Dose Analysis submitted to the NRC on August 7, 2006, and approved by your letter dated October 27, 2006. In addition, the plan addresses the removal of the *legacy* waste stored on site and the final survey of the storage area. Partners considers that the Remedial Work Plan and the procedures referenced in the plan respond to your request that the NRC staff be kept informed of the remediation activities at the site.

The site contractor is presently mobilizing to the site, preliminary remediation activities are scheduled to begin on Monday, November 13, 2006.

If you have any questions regarding the Remedial Work Plan, please contact Dr. Barry Koh at 410-822-7338 or Mr. Dan Brown at Partners' Corporate Office at 440-248-6005.

Sincerely,  
Partners Environmental Consulting, Inc.

Kevin J. Sobnosky, PE, CHMM, CPEA  
Director of Operations

cc: Howard Pulsfier, AAR Corp., with attachments  
Kristina Banovac, USNRC, with attachments  
Mark Wetterhahn, Winston & Strawn, with attachment

File: 358.01

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Partners Environmental Consulting  
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