



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

JAN 26 1984

*Patterson:
Is this yours?
Where is this
JW
1/26/84*

FCUP:ALS
40-8088

MEMORANDUM FOR: John W. Hickey, Section Leader
Industrial Section
Material Licensing Branch

FROM: William T. Crow, Section Leader
Uranium Process Licensing Section
Uranium Fuel Licensing Branch

SUBJECT: REVIEW OF APPLICATION FOR DECOMMISSIONING PLAN,
CONSOLIDATED ALUMINUM, DOCKET NO. 40-8088

As requested, we have completed a review of the subject application and feel the following items should be addressed:

1) A commitment by a Consolidated Aluminum Corporation Officer (President, Vice President, or Treasurer) that funds will be made available to decontaminate the facilities at the end of plant life.

2) Section 4.1

The licensee should provide an estimation of the total quantities of solid wastes to be removed for burial at the time of decommissioning.

3) Sections 3.1 and 3.2.3

The plan should indicate that the "post-radiological" survey shall include all areas (buildings) involving the licensed material; not just waste storage areas.

4) Section 3.2.3

It is not appropriate to use the "Acceptable Surface Contamination Levels" listed in Table 1 of the plan as the criteria for decontaminating the soil in the waste storage area. In the absence of regulatory standards we have been using our Branch Technical Position paper for decontaminating the soil. The BTP is enclosed.

W.T. Crow

W. T. Crow, Section Leader
Uranium Process Licensing Section
Uranium Fuel Licensing Branch
Division of Fuel Cycle and
Material Safety

B-6

Enclosure: As stated

ENCLOSURE 3

SUGGESTED LETTER TO USR INDUSTRIES

CERTIFIED MAIL/RETURN RECEIPT

USR INDUSTRIES, INC.
2203 Timerloch Place
The Woodlands, Texas 77380

Gentlemen:

This letter concerns the five NRC licenses issued to United States Radium Corporation prior to 1982, particularly License Number 37-00030-02, issued on June 20, 1956. On January 21, 1981, we received notification that United States Radium Corporation had changed its name to Safety Light Corporation (SLC). During an inspection on March 8, 1983, we learned that SLC had been sold. A follow up letter from SLC dated November 11, 1983 states that USR Industries, Inc. completed sale of SLC on May 24, 1982.

Please note that NRC did not receive prior notice of sale of SLC, and that prior approval of this transaction and the resulting transfer of the license was not obtained as required by 10 CFR Section 30.34(b). We are now reviewing the renewal application for License Number 37-00030-02, submitted by SLC on January 27, 1984. This license covers substantial radioactive contamination on the SLC site. While SLC has acknowledged responsibility for its properties and assets, it is possible that in the future they may encounter problems with meeting their responsibilities, particularly with respect to decontamination and decommissioning. We are reviewing their capabilities as part of the license renewal effort. Please be advised that it may be necessary for NRC to review whether USR Industries may be held liable for any obligations not met by SLC.

USR Industries, Inc.

- 2 -

If the information provided by SLC is incorrect, or if you have any other comments on this matter, please contact us.

Sincerely,

(Region I)

cc: Safety Light Corporation
USR Metals Corporation

Suggested concurrences:

FCML

ELD

ELD

IE

JHickey

RFonner

JLieberman JAxelrad

AUG 9 1984

MEMORANDUM FOR: John D. Kinneman, Chief
Nuclear Material Section A
Region I

FROM: John W. N. Hickey, Section Leader
Industrial Section
Material Licensing Branch, FC, NMSS

SUBJECT: RENEWAL OF SAFETY LIGHT CORPORATION, LICENSE NUMBER
37-00030-02

As discussed in your memorandum dated September 22, 1983, we have reviewed the status of Safety Light Corporation (SLC), particularly with respect to License Number 37-00030-02, currently under timely renewal, which covers substantial radioactive contamination in equipment, buildings, and soil.

Based on your inspection and SLC's letter dated November 11, 1983, it is clear that USR Industries sold Safety Light Corporation, apparently through a sale of stock to the present owners, on May 24, 1982. There was no NRC review or approval pursuant to 10 CFR Section 30.34(b).

We recommend that you process the renewal application submitted by Safety Light Corporation on January 27, 1984, (Enclosure 1). Our correspondence with Consolidated Aluminum Corporation may be of help to you in addressing your questions concerning the decommissioning plan, cost estimates, and financial commitments. It would also seem appropriate to get the licensee to establish a decommissioning schedule. Please feel free to call me or Bill Crow if you have further questions regarding decommissioning requirements. Please note that the Office of Nuclear Regulatory Research is developing a rule which would require licensees to provide for availability of funds for decommissioning. However, it is difficult to predict when this rule will be finalized.

You also raised concerns that SLC may have fewer financial resources than USR Industries. We recommend that you send the attached letter to USR Industries (Enclosure 3).

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| OFFICE > | | | | | | | |
| SURNAME > | | | | | | | |
| DATE > | | | | | | | |

AUG 9 1984

John D. Kinneman

- 2 -

Please note that an NRC contractor, Oak Ridge Associated Universities, published a site evaluation of SLC in July 1982 with a Supplement in November 1982. Region I was provided with copies. If you need additional copies, please contact me.

John W. N. Hickey, Section Leader
Material Licensing Branch
Division of Fuel Cycle and
Material Safety

Enclosures:

- 1. SLC Renewal Application and License
- 2. Correspondence with Consolidated Aluminum
- 3. Suggested Letter to USR Industries

DISTRIBUTION:

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 RPage
 RFonner
 JLieberman
 JAxelrad

w/c.c. #3

Record Note: Comments from RFonner and JLieberman, ELD, have been incorporated into this memo.

XXXXXXXXXXXXXXXXXXXXXXXXXXXX

*See previous concurrence

| | | | | | | |
|--------|------------|--------|---------|--|--|--|
| OFFICE | FCML * | FCML * | ELD * | | | |
| NAME | JHickey:ht | RPage | RFonner | | | |
| DATE | 7/5/84 | 8/9/84 | 7/15/84 | | | |

John D. Kinneman

- 2 -

AUG 9 1984

Please note that an NRC contractor, Oak Ridge Associated Universities, published a site evaluation of SLC in July 1982 with a Supplement in November 1982. Region I was provided with copies. If you need additional copies, please contact me.

John W. N. Hickey, Section Leader
Material Licensing Branch
Division of Fuel Cycle and
Material Safety

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1. SLC Renewal Application and License
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 RGPPage
 RFonner
 JLieberman
 JAxelrad

Notes: Type this in comments page

Received Note: Comments from RFonner and J Lieberman, R.A.D., have been incorporated into this report.

| | | | | | | | |
|----------|------------|--------|---------|------------|----------|--|--|
| OFFICE ▶ | FCML | FCUF | ELD | ELD | FE | | |
| NAME ▶ | JHickey:ht | RGPage | RFonner | JLieberman | JAxelrad | | |
| DATE ▶ | 7/5/84 | 7/1/84 | 7/1/84 | 7/1/84 | 7/1/84 | | |



**CONSOLIDATED
ALUMINUM**

618-452-5190
TWX 910-756-2393

23656
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May 15, 1984

Mr. James W. Patterson
Material Licensing Branch
Division of Fuel Cycle and Material Safety
U. S. Nuclear Regulatory Commission
Mail Control No. 22368
Washington, D.C. 20555

Ref: Docket on Reference No. 040-08088
License No. STB-1097

Dear Mr. Patterson:

In response to your letter dated February 17, 1984, please find enclosed a revised Decommissioning Plan, in duplicate, for the Madison Plant of Consolidated Aluminum Corporation located at College and Weaver Streets, Madison, Illinois. The additional information requested in your letter of February 17, 1984, has been incorporated therein.

Please note that Consolidated's contact regarding the subject Material License should be changed from R. J. Moder to the undersigned.

Very truly yours,

B. W. Moore
Technical Manager

BWM:clj

Enclosure

MAY 17 10:30

Region III 05/17/84

Enclosure 2

3.3 Final Report and Application for Release of Area to Unrestricted Use

A final report will be submitted to the NRC for release of the area for unrestricted use at the time of license termination and prior to discontinuance of plant operation by Consolidated Aluminum.

3.3.1 Report will include:

- a. Identity of premises and license
- b. Description and location of area of survey.
- c. Description of scope of survey and procedures followed.
- d. Record of final radiological results with a comparison of local background radiation
- e. Request of the NRC for approval and release for unrestricted use.

4.0 FINAL COST ESTIMATE

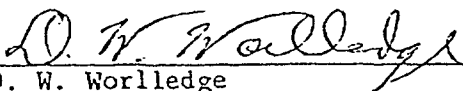
4.1 (Anticipated Costs at Present Rates - based on burial at existing sites in Barnwell, South Carolina and/or Hanford, Washington, and transportation via licensed carrier, such as Tri-State)

| | |
|---|---------------|
| Material Transportation Costs | \$ 600,000 |
| Material Burial Costs | 675,000 |
| Post Radiological Survey and Permitting | <u>25,000</u> |
| Total | \$ 1,300,000 |

The above cost estimate of waste to be removed for burial at the time of decommissioning is based on the removal of 3,300,000 pounds of magnesium-thorium sludge. (Approximately 130,000 pounds of thorium at a 4% concentration.) No volumes have been considered in the above costs for any contaminated soils, material, equipment, etc., which may be identified during the post-radiological survey.

5.0 ACKNOWLEDGMENT OF PLAN

The necessary funds to complete decommissioning of the facility, as described herein, will be appropriated by Consolidated Aluminum Corporation upon the end of plant life.


D. W. Worlledge

V. P. Manufacturing Operations
Title