



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

July 19, 2000

Mr. J. William Lessig
Plant Manager
Honeywell International, Inc.
P.O. Box 430
Metropolis, IL 62960

SUBJECT: REVISION TO JUNE 8, 2000, LETTER REGARDING RADIOACTIVE WASTE
BURIAL OF SCRAP METAL LESS THAN 0.05 PERCENT BY WEIGHT
(TAC NO. L31353)

Dear Mr. Lessig:

I am responding to your letter dated May 25, 2000, informing the US Nuclear Regulatory Commission (NRC) of your plan to transfer 90,000 cubic feet of scrap metal, under 10 CFR 40.13. "Unimportant Quantities of Source Material," for burial at Waste Control Specialists Inc. (WCS), in Texas. In addition, you submitted supplemental information to support your request on June 2 and June 21, 2000. In these letters, you propose to take the following actions to ensure that the material transferred to WCS is below the limit of 10 CFR 40.13 (a).

1. Perform a visual survey of each item prior to loading into the shipping container including opening pipes, valve bodies, and vessels that may contain source material on the inside and eliminate any visible contamination by decontamination.
2. Perform a direct radiation survey of each item prior to loading into the shipping container. Items that exceed a fixed/removable survey of 200,000 dpm/100 cm² or a direct contact reading of 200 micro-R/hour will be segregated, and decontaminated. Scrap that can not be decontaminated below the above levels will be shipped as low level waste.

10 CFR 40.13 (a) states that, "Any person is exempt from the regulations in this part and from requirements for a license set forth in section 62 of the Act to the extent that such person receives, possesses, uses, transfers or delivers source material in any chemical mixture, compound, or alloy in which the source material is by weight less than one-twentieth of one percent (0.05 percent) of the mixture, compound, solution, or alloy". The NRC staff has conducted a detailed review of the information you submitted and conclude that individual radiation dose will not exceed 2 mrem/yr.

Mr. J. William Lessig

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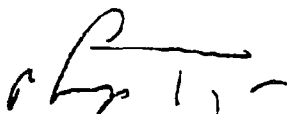
The NRC staff performed external dose calculations based on the requirements set forth in "Staff Requirements - SECY-99-259 - Exemption in 10 CFR Part 40 for Materials less than 0.05 percent Source Material - Options and Other Issues Concerning the Control of Source Material," dated March 9, 2000. The NRC staff also reviewed your proposed screening method and agree that it is sufficient to meet the limit of 10 CFR 40.13 (a). Therefore, since the scrap metal will contain source material under 0.05 percent by weight as specified in 10 CFR 40.13(a), no specific NRC approval is required for the transfer of this material for disposal at WCS and the material need not be manifested pursuant to 10 CFR 20.2006.

It is noted, however, that the other requirements, such as those imposed by the Texas Natural Resource Conservation Commission and the Texas Department of Health, may apply to the transfer and disposal of the material. Therefore, we suggest that you contact the Texas officials on this matter. Furthermore, it should be noted that NRC is currently having draft NUREG-1640, "Radiological Assessments for Clearance of Equipment and Materials from Nuclear Facilities" reviewed through the Center for Nuclear Waste Regulatory Analyses as a result of issues raised during public workshops on the control of solid materials. Until the result of this study is available, NRC has suspended use of the techniques and parameter values contained therein. Our decision to approve this request to transfer the subject materials under the provisions of 10 CFR 40.13 (a), is based on an independent analysis and has in no way used the recommendations in draft NUREG-1640. Until NRC has made a final decision and published a final version of NUREG-1640, license amendments or source material transfer requests based on NUREG-1640 may be rejected, unless there is additional and sufficient technical bases, independent of the scenario analysis and parameter values contained in NUREG-1640, which provide adequate technical basis to support the licensing decision.

This letter supercedes the letter submitted to you on June 8, 2000, regarding the same subject.

If you have any further questions, please contact Leslie Fields of my staff at 301-415-6267.

Sincerely,



Philip Ting, Chief
Fuel Cycle Licensing Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS

Docket 40-3392
License SUB-526

Enclosures:

1. Ltr requesting transfer of scrap metal,
dtd 5/25/00
2. Memorandum dtd 6/2/00