



Matt Blunt, Governor • Doyle Childers, Director

DEPARTMENT OF NATURAL RESOURCES

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February 13, 2008

Mr. John Buckley
U.S. Nuclear Regulatory Commission
Two White Flint North Building
11545 Rockville Pike
Rockville, MD 20852-2738

RE: Comments Regarding the Amendment Request for License STB-401
Unreacted Ore Removal from Plant 6W, Mallinckrodt, Inc.

Dear Mr. Buckley:

On behalf of the Missouri Department of Natural Resources, this letter pertains to the amendment request to the U.S. Nuclear Regulatory Commission, by Mallinckrodt, Inc. dated August 10, 2007. Comments are provided at this time as the request is now being reconsidered based on new information. They are enclosed in this letter.

If you have any questions regarding these comments, please contact me at (314) 877-3250, or by written correspondence to 917 N. Hwy 67, Suite 104, Florissant, MO 63031. Thank you again for offering this opportunity for us to provide input.

Sincerely,

HAZARDOUS WASTE PROGRAM

Eric Gilstrap, P.E.
Federal Facilities Section

EG:dd

c: Ms. Karen Burke, Mallinckrodt, Inc.
Ms. Sharon Cotner, USACE FUSRAP Program Manager
Mr. Aaron Schmidt, Chief, DOE Unit, Federal Facilities Section

Enclosure

COMMENTS ON
MALLINCKRODT REQUEST FOR NRC LICENSE AMENDMENT
TO REMOVE URO FROM PLANT 6W

1. Table 6-2 gives reference to a 3" x ½" NaI scintillation detector (including detection capabilities) as a typical instrument for performing radiological surveys. Is this in reference to a FIDLER or similar probe? We haven't seen these used at the site, but more commonly have seen the 2" NaI Ludlum 44-10 being used. We merely wish that Mallinckrodt, Inc. verifies which equipment will indeed be used.
2. Table 6-4 provides surface release criteria for equipment that was derived by Mallinckrodt C-T. Has Mallinckrodt given the NRC the opportunity to review the derivation and does the NRC concur with the conclusions? (Further explanation of this question can be provided if needed.)
3. Section 6.3.3, Liquid Effluent Monitoring describes testing of water for comparison to standards in 10 CFR Part 20, Appendix B, Table 3 prior to discharge to the sanitary sewer. We merely wish to remind Mallinckrodt, Inc. of requirements imposed by the recipient, MSD. The conditions between the two (MSD and 10 CFR Part 20) are significantly different. (Note: there is a brief mention of needing to give heed to MSD limits in Section 8.4 but no further description is provided.)
4. Section 8.2 states that the presence of mixed waste is not anticipated. Thus, little information is given regarding plans for treatment and disposal of mixed waste other than saying that contingency plans will be available should it be found. We wish Mallinckrodt, Inc. would provide further clarification regarding this matter as follows: (Note: this can be provided separately from the work plan rather than requiring further revisions of the document.)
 - Is other data available regarding potential contents (particularly heavy metals) of the URO than just U and Th as mentioned briefly in Table 2?
 - If such data is available, we wish that Mallinckrodt, Inc. would further review this data and provide statements confirming the assumption of mixed waste not being present or otherwise identify whether further planning will be needed.
 - If no such data is available, we desire further explanation by Mallinckrodt, Inc. supporting their assumption regarding the unlikely presence of mixed waste.