



**SIGMA-ALDRICH**

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December 15, 2008

George M. McCann  
U.S. NRC Region III  
2443 Warrenville Road  
Suite 210  
Lisle, IL 60532-4352

RE: NRC License 24-16273-01; DP Modification

Dear Mr. McCann:

Sigma-Aldrich submitted a Decommissioning Plan (DP) with a cover letter dated October 22, 2008 proposing to obtain release of the Fort Mims site with the building intact, and to subsequently demolish the building. As noted in that letter, we have contracted with Philotechnics, Ltd., to complete the scope of work defined in the DP under purchase order 4100240836.

A critical aspect of the DP is the characterization of an abandoned septic system. This septic system is currently buried somewhere beneath the concrete floor (approx. 5 in. thick) of Labs 2 and 4. With this in mind, we now believe that characterization of the septic area would be best accomplished after removal of the building. This would allow unrestricted access to the entire concrete pad covering the septic system, thereby optimizing our ability to locate and characterize the septic area, without equipment restrictions.

Consequently, Sigma-Aldrich proposes to complete the decommissioning in a phased approach, as indicated below:

Phase 1

Characterize, remediate, and perform final status survey of the building.  
Characterize surrounding soil.

Phase 2

Demolish the building and survey concrete pad for free release. Remove concrete pad.

Phase 3

Locate, characterize, remediate (if necessary) and perform final status survey of the septic area. Remediate (if necessary) surrounding soil. Perform final status survey of soil. Note: prior to any remediation of the soil or septic area, the DP will be revised and presented to the NRC for review and approval.

Upon completion of Phase 3, the site will be ready for final release and license termination by the NRC.

There is no change in scope of the DP, merely a change in the order of operations. Specifically, we are assessing the septic area after removal of the building, rather than before.

Please advise Sigma-Aldrich if this approach is an acceptable modification to the original DP.

Sincerely,



Thomas K Spencer  
Radiation Safety Officer  
Sigma-Aldrich  
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CC:

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Bob Ringering, Director of Manufacturing, Sigma-Aldrich  
Cheryl Stipsits, Director of Environmental, Health & Safety, Sigma-Aldrich