

May 1, 2009

MEMORANDUM TO: Margaret J. Bupp, Acting Chief  
Reactor Decommissioning Branch  
FSME, DWMEP

FROM: Christine Lipa, Chief */RA by George M. McCann Acting for/*  
Material Control, ISFSI, and Decommissioning  
Branch  
Division of Nuclear Materials Safety

SUBJECT: TRANSFER OF PROJECT MANAGEMENT OF THE CSX  
TRANSPORTATION, INC. PROPERTY FROM REGION III TO FSME

This refers to our April 9, 2009, telephone discussion regarding the transfer of project management for the CSX Transportation, Inc. (CSX) site from Region III to FSME/DWM. During the call we briefly discussed the history of NRC project management and inspections regarding the AAR Manufacturing Group, Inc. (AAR) site, located in Livonia, Michigan, in addition to the properties adjoining the AAR site, which includes the CSX property. We also discussed the likelihood that the contamination identified on the CSX property by the NRC during past inspections came from the former NRC licensee Brook & Perkins Corporation, who was subsequently bought out by the current owner AAR Manufacturing, Inc.

By way of background, the NRC on May 15, 1997, performed a radiological scoping survey on the CSX property, which is adjacent to AAR. During this activity, NRC inspectors identified contamination above the NRC unrestricted use criteria, (NRC Inspection Report (see ADAMS ML091000360)). On September 13, 2000, CSX submitted a survey and dose assessment to demonstrate that the CSX site met the unrestricted use criteria of 25 mrem/y (see ADAMS ML090680748). During an October 20, 2000, teleconference the NRC informed CSX management that the NRC determined that the CSX evaluation and survey weren't adequate to demonstrate that the CSX site met the NRC's unrestricted use criteria. In an October 27, 2000, NRC letter to CSX, the NRC documented the October 20 telephone conversation (see ADAMS ML003765576). The October 27 letter is the last Region III communication with CSX.

Based on staff review of the group characterization criteria outlined in the NRC's NUREG-1757, staff concludes that the type, quantity and disposition characteristics of the contamination existing at the CSX site appears to be consistent with the criteria for a Group 4 decommissioning activity. Review of the NUREG-1557 guidance infers that Group 3 and 4 decommissioning

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projects can be managed either by the Regional Office or the Program Office. Region III staff reviewed the factors outline in the NUREG guidance, which is designed to assist staff in making a determination regarding which Office is most appropriate for assuming project oversight responsibility. It is Region III's opinion that FSME would be the best authority for managing this site, with Region III supporting FSME through inspection.

If you have any questions, please do not hesitate to contact me or Peter Lee, (630) 829-9870.

DISTRIBUTION:

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FROM: Christine Lipa, Chief  
 Material Control, ISFSI, and Decommissioning  
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 Division of Nuclear Materials Safety

SUBJECT: TRANSFER OF PROJECT MANAGEMENT OF THE CSX RAILROAD  
 PROPERTY FROM REGION III TO FSME

This refers to our April 9, 2009, telephone discussion regarding the transfer of project management for the CSX Transportation, Inc. (CSX) site from Region III to FSME/DWM. During the call we briefly discussed the history of NRC project management and inspections regarding the AAR Manufacturing Group, Inc. (AAR) site, located in Livonia, Michigan, in addition to the properties adjoining the AAR site, which includes the CSX property. We also discussed the likelihood that the contamination identified on the CSX property by the NRC during past inspections came from the former NRC licensee Brook & Perkins Corporation, who was subsequently bought out by the current owner AAR Manufacturing, Inc.

By way of background, the NRC on May 15, 1997, performed a radiological scoping survey on the CSX property, which is adjacent to AAR. During this activity, NRC inspectors identified contamination above the NRC unrestricted use criteria, (NRC Inspection Report (see ADAMS ML091000360)). On September 13, 2000, CSX submitted a survey and dose assessment to demonstrate that the CSX site met the unrestricted use criteria of 25 mrem/y (see ADAMS ML090680748). During an October 20, 2000, teleconference the NRC informed CSX management that the NRC determined that the CSX evaluation and survey weren't adequate to demonstrate that the CSX site met the NRC's unrestricted use criteria. In an October 27, 2000, NRC letter to CSX, the NRC documented the October 20 telephone conversation (see ADAMS ML003765576). The October 27 letter is the last Region III communication with CSX.

Based on staff review of the group characterization criteria outlined in the NRC's NUREG-1757, staff concludes that the type, quantity and disposition characteristics of the contamination existing at the CSX site appears to be consistent with the criteria for a Group 4 decommissioning activity. Review of the NUREG-1557 guidance infers that Group 3 and 4 decommissioning.

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