CINTICHEM, INC.
P.O. BOX 816
TUXEDO, NEW YORK 10987 (914) 351-2131

December 8, 1994

Mr. Dominick A. Orlando
U. S. Nuclear Regulatory Commission
Office of Nuclear Material Safety and Safeguards
Division of Waste Management
Low-Level Waste and Decommissioning Projects Branch
Washington, D.C. 20555-0001

Dear Mr. Orlando:

Reference: Docket 70-687, License SNM 639, Amendment #6 Dated January 16, 1992

The referenced license amendment authorized the decommissioning of the radiochemical production facilities on the Cintichem site in accordance with the Cintichem Decommissioning Plan submitted October 19, 1990 and a specific request to amend the SNM 639 license dated April 17, 1991. License condition H that was a part of amendment #6 stipulated that the schedule for completion of the decommissioning project was 36 months from the date of the amendment, January 16, 1992. We are nearing the scheduled date for completion, January 16, 1995, and it is apparent now that the project will not be completed as scheduled.

This letter is to request an extension of the scheduled completion date based on the following considerations:

- Workscope greater than originally anticipated.

  Approximately 24 months into the project, two major developments occurred that expanded the workscope considerably. The planned method for decommissioning the hot cells was to decontaminate these facilities prior to demolition and then to dismantle them along with the building structure. This plan could not be followed after contaminated soil was found under three of the cells. Demolition of the hot cells had to be done much earlier in the project, essentially adding a major task to the project prior to the final building survey and dismantlement. Another unforeseen complication that expanded the workscope was the discovery of deep soil contamination under the hot cell exhaust ventilation duct header beneath the hot lab operating area. These additions to the project workscope have caused a delay of several months to the project completion date.

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- Developments beyond Cintichem's control.

  The project start date was delayed a few months due to late DOE approval for shipping reactor spent fuel to Savannah River for reprocessing.

  The decommissioning project was started without having clearly defined criteria or guidelines for developing criteria for residual soil contamination. Site-specific criteria were initially proposed by Cintichem in July of 1992. Until these criteria were approved soils that were removed from the project had to be segregated and stored provisionally either as contaminated for disposal or as acceptable for retention until the acceptance criteria were approved by NRC with the concurrence of the NYSDEC. Initial soil criteria were approved August 26, 1993. It is difficult to determine exactly how much delay was incurred by this lack of definite soil acceptance criteria, but the added burden imposed by having to store large volumes of soil and the multiple handling involved in implementing the storage and final disposition caused significant delays in all of the tasks involving soil removal.

  The chronic problems encountered with maintaining or gaining access to low level waste disposal facilities throughout the country especially for generators such as Cintichem located in a non-sited Compact or State have caused significant delays in the project. The Barnwell site closed to out-of-compact generators June 30, 1994. Cintichem, in anticipation of the closure of the Barnwell, South Carolina site, petitioned the N. W. Compact in 1993 to gain access to the Clive, Utah site. It took well over a year to gain the approval that was finally granted in August 1994. These efforts required a diversion of technical resources that could have been used on the decommissioning project and consequently the schedule was adversely affected. Additionally, the waste disposal surcharges that were imposed in 1992 prompted changes in decommissioning methodology. Economic considerations favored the choice of decontamination over disposal and consequently some tasks required more time for completion.

In consideration of these causes for delay and as provided for in SNM 639 license condition H, Cintichem hereby requests an extension of 12 months in the schedule for the completion of the decontamination work on the project.

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Thank you for your favorable consideration.

Very truly yours,

J. J. McGovern
President/Plant Manager

JJMcG/bjc

cc: Ms. Barbara Youngberg
Bureau of Radiation
NYS Dept of Env Conservation
50 Wolf Road
Albany, NY 12233-7255

Ms. Rita Aldrich
New York State Department of Labor
One Main Street, Room 813
Brooklyn, NY 11201

Director, Technical Development Programs
State of New York Energy Office
Agency Building 2
Empire State Plaza
Albany, NY 12223

Mr. J. Ribando
Supervisor
Town of Tuxedo
P. O. Box 725
Tuxedo, NY 10987

Ava Gartner
Berle, Koss and Case
145 Rockefeller Plaza
New York, NY 10111

Mr. Theodore S. Michaels
U. S. Nuclear Regulatory Commission
1 White Flint North
11555 Rockville Pike
Rockville, MD 20852

Mr. David N. Fauver
U. S. Nuclear Regulatory Commission, NMSS
1 White Flint North
11555 Rockville Pike
Rockville, MD 20852

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cc: (continued)

Mr. Thomas F. Dragoun
U. S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Ken Magar
Building Inspector
Town of Tuxedo
Tuxedo Park, NY 10987

J. Adler
F. Morse
M. Stadler
E. Truskowski
P. Yachmetz

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