



UNION CARBIDE CORPORATION
MEDICAL PRODUCTS DIVISION

P. O. BOX 324, TUXEDO, NEW YORK 10987
TELEPHONE NUMBER: (914) 351-2131

March 3, 1982

U. S. Nuclear Regulatory Commission
License Fee Management Branch
Office of Administration
Washington, D.C. 20555

Attn: Mr. William O. Miller
Branch Chief

Ref: (a) NRC Letter 2/19/82 Docket 70-687
(b) UCC Letter 6/19/81
(c) UCC Letter 11/2/81

Dear Sir:

The referenced letter (Ref. a.) requests remittance of an administrative fee of \$150 to extend the due date for submission of an Emergency Plan under our license SNM-639.

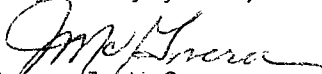
This request for extension we contend was neither entirely for our convenience nor was it within our control. As explained in our correspondence (Ref. c.) UCC has an Emergency Plan on file with the Commission which was submitted 5/23/80. It followed the requirements of 10 CFR 50 App. E., Sec. IV, Reg. Guide 2.6 and ANS Standard 15.16. It addresses radiological contingencies for the entire site.

Subsequent to our filing this plan we learned that the Office of Material Safety and Safeguards and the Office of Nuclear Reactor Regulation would require submission of new plans pursuant to new guidelines. It was our plan to once again file a common plan to cover all of our operations with the reactor and with SNM. We had received the guideline from the Office of Materials Safety and Safeguards and expected the guideline from the Office of Nuclear Reactor Regulation shortly. Consequently we requested the extension to allow a common plan to be developed that addressed the requirements of both organizations within the NRC.

Since the extension was requested as a result of not having both guidelines from the NRC simultaneously, we believe that we should not be held liable for the extra administrative fee.

Thank you for your consideration in this matter.

Very truly yours,


James J. McGovern
Business Manager
Radiochemicals

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PDR ADDCK 07000487
C. PNR

JJMcG:js



UNION CARBIDE CORPORATION
MEDICAL PRODUCTS DIVISION
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June 19, 1981

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JUN 22 1981

Mr. F. D. Fisher, Ph.D.
U. S. Nuclear Regulatory Commission
Division of Fuel Cycle and Materials Safety
Willste Building Mail Stop 396SS
7915 Eastern Avenue
Silver Spring, MD

Ref. USNRC Letter Dated 2/11/81.

Dear Dr. Fisher:

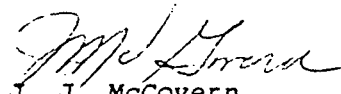
The referenced letter transmitted an NRC order to modify License SNM-639 (Docket 70-687) to include a radiological contingency plan in accordance with a definite guideline that was enclosed with the order. We note that the NRC office of Nuclear Reactor Regulation, Division of Licensing has a similar requirement for all licensees under Part 50 of the regulations, however, a guide for this plan is yet to be published.

Since the Union Carbide nuclear facility in Tuxedo, New York is licensed under Part 70 and Part 50, and the operations governed by these licenses are closely related, we believe that a consolidated radiological contingency plan that addresses pertinent concerns under both licenses would be more appropriate than two separate plans.

Since we anticipate receiving a guide for Part 50 radiological contingency plans soon, we respectfully request that the deadline of the referenced order be extended to coincide with the deadline for the Part 50 licensees.

Thank you for your consideration.

Very truly yours,


J. J. McGovern
Business Manager
Radiochemicals

JJMcG:js

bcc: C. J. Konnerth etal
 M. H. Voth etal

8-107280652
pdr



UNION CARBIDE CORPORATION
MEDICAL PRODUCTS DIVISION
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TELEPHONE: 914-351-2131

November 2, 1981

Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Ref: Emergency Preparedness Plan

Gentlemen:

Union Carbide operates a 5 MW research reactor under Operating License R-81. The N.R.C. has required that our emergency preparedness be updated via amendments to 10 CFR 50 and Appendix E.

On May 23, 1980, Union Carbide submitted to the NRC's Standardization and Special Projects Branch, Division of Licensing our request for renewal of Operating License R-81. Submitted for approval with this license renewal request was the UCNR Emergency Plan. This plan was written in accordance with 10 CFR 50 Appendix E Section IV, Regulatory Guide 2.6, and American Nuclear Society Standard 15.16. This plan addresses emergency preparedness for the entire site and is now in effect.

Union Carbide plans to expeditiously review and update this existing plan upon receiving further guidance from updated Regulatory Guide 2.6 and ANS Standard 15.16.

Sincerely,

William G. Ruzicka
Reactor Supervisor

WGR:ltm

cc: Mr. G. Bates
Division of Emergency Preparedness Development Branch
Office of Inspection & Enforcement
Nuclear Regulatory Commission
AR 5003
4450 Montgomery Avenue
Bethesda, Maryland

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November 2, 1981

Director of Nuclear
Material Safety and Safeguards
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Ref: USNRC Letter Dated July 24, 1981

Gentlemen:

The referenced letter modified the February 11, 1981 Radiological Contingency Plan Order to allow Union Carbide to integrate the radiological contingency plan for Special Nuclear Materials License No. SNM-639 (Docket 70-687) into our site-wide emergency plan.

On May 23, 1980, Union Carbide submitted to the NRC's Standardization and Special Projects Branch, Division of Licensing our request for renewal of Operating License R-81. Submitted for approval with this license renewal request was the UCNR Emergency Plan. This plan was written in accordance with 10 CFR 50 Appendix E Section IV, Regulatory Guide 2.6, and American Nuclear Society Standard 15.16. This plan addresses emergency preparedness for the entire site and is now in effect.

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Sincerely,

William G. Ruzicka
Reactor Supervisor

WGR:ltm

cc: F. D. Fisher PhD
U. S. Nuclear Regulatory Commission
Division of Fuel Cycle and Materials Safety
Willste Building Mail Stop 396SS
7915 Eastern Avenue
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