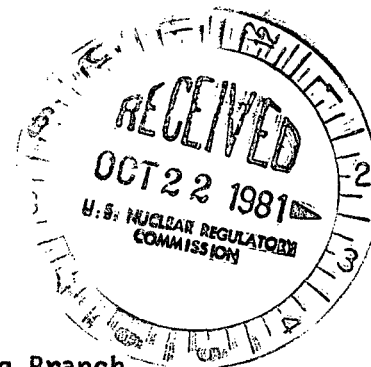


Docket No. 70-687
SNM-639

OCT 13 1981



MEMORANDUM FOR: Leland C. Rouse, Chief
Advanced Fuel and Spent Fuel Licensing Branch
Division of Fuel Cycle and Material Safety

FROM: A. T. Clark
Advanced Fuel and Spent Fuel Licensing Branch
Division of Fuel Cycle and Material Safety

SUBJECT: SITE VISIT TO UNION CARBIDE SITE, TUXEDO, N.Y.

On October 1 and 2, 1981 I made the subject site visit to meet with Union Carbide personnel and obtain environmental and safety information. Meeting attendees are shown on Attachment 1. The Scientific Applications, Inc. (SAI) personnel are our contractor consultants for the preparation of an environmental assessment associated with the renewal of Material License No. SNM-639.

Owner Change

We were informed by Mr. Voth that in April site ownership had passed to the Cinti-Chem subsidiary of the Medi-Physics subsidiary of Hoffman-TaRoche Company, a Swiss Corporation. Mr. McGovern is the chief officer of the site organization shown in Attachment 2. According to Mr. Voth all employees shown on the chart are Union Carbide employees and Union Carbide owns the buildings housing the reactors and the hot cells.

New Waste Storage Facility

In order to ease their waste management handling at the site and with shipments to South Carolina, the licensee has requested an amendment to the license to permit the interim on-site storage of radioactive waste packages (drums) at the north end of the hot cell building. Construction of this new facility is almost complete. Attachment 3 shows the arrangement of the new facility. Since Union Carbide is almost ready to use this facility, our immediate attention to this matter was requested. I promise to give it a high priority.

Relationship of Licensing Authorities

The licensee stressed the need for a clarified view of their relationship with Nuclear Reactor Regulation, the state of New York, and NMSS.

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After considerable discussion, I agreed to prepare a regulatory basis for our responsibilities to hopefully clarify the licensee - authority relationships.

In a related discussion it was agreed that any license conditions related to by-product material which apparently was under dual control with the state of New York should use only one limit to avoid a misleading and confusing situation. We will attempt to obtain agreement from the New York Department of Labor on this point.

Consolidation of License

The licensee agreed that it would be useful, as part of its renewal application, to consolidate information contained in all previous license - referenced correspondence into one single package for ease of reference and inspection. It was suggested that proposed Regulatory Guide FP 716-4 on standard format and content for uranium fabrication plant applications be used for guidance, disregarding those sections which would not apply. The licensee will consider using this format in their response to our request for additional information for the renewal.

It also was agreed that the section of FP 716-4 on ALARA would be useful for the licensee in its presentation to us on ALARA.

Accident Analysis

We explained to the licensee the relationship of the analysis of accidents for all licensed activities for 1) environmental impact analysis, 2) emergency planning, and 3) safety review. It was indicated that the interrelation of accidents must be analyzed. The licensee felt that it could be shown that accidents under each license were sufficiently isolated that there could not be a "domina" effect of greater releases at one time.

The licensee has developed some information with respect to the effects of natural phenomena at the site which should be valuable for providing a perspective on that type of accidental release.

Environmental Assessment

The licensee provided a site tour for the SAI personnel and environmental information. SAI indicated that assessment normally considered a 50 mile radius for dose effects. It was indicated that we expect to complete the environmental assessment by about April 1982, with

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about two months provided for the licensee's response to our request for additional information.

Original signed by

A. Thomas Clark

A. T. Clark
Advanced Fuel and Spent Fuel
Licensing Branch
Division of Fuel Cycle and
Material Safety.

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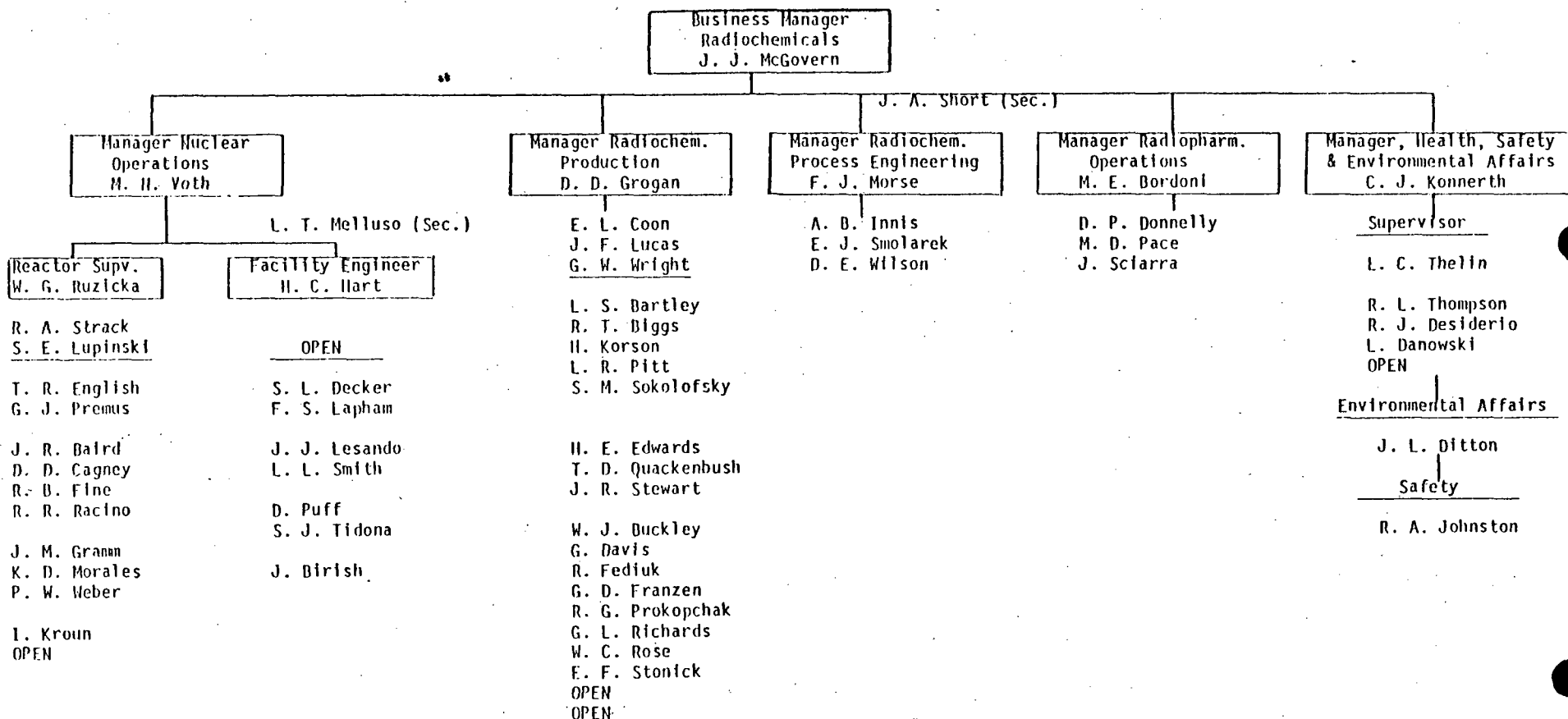
ATTACHMENT I

<u>NAME</u>	<u>ORGANIZATION</u>	
Tom Clark	USNRC - NMSS - FCAF	301-427-4205
Cliff Konnerth	UCC	
Jerome Roth	USNRC - Region I - I & E	
Hal Bernard	USNRC - Washington - DRR/DL	301-492-9799
Marc Voth	VCC	914-351-2131
Frank Wimpey	SAI	703-821-4429
Ray Roland	SAI	703-734-4020
Jim McGovern	UCC	
Bill Kuzhika	UCC	

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ATTACHMENT 2

UNION CARBIDE CORPORATION
MEDICAL PRODUCTS DIVISION
TUXEDO, NEW YORK

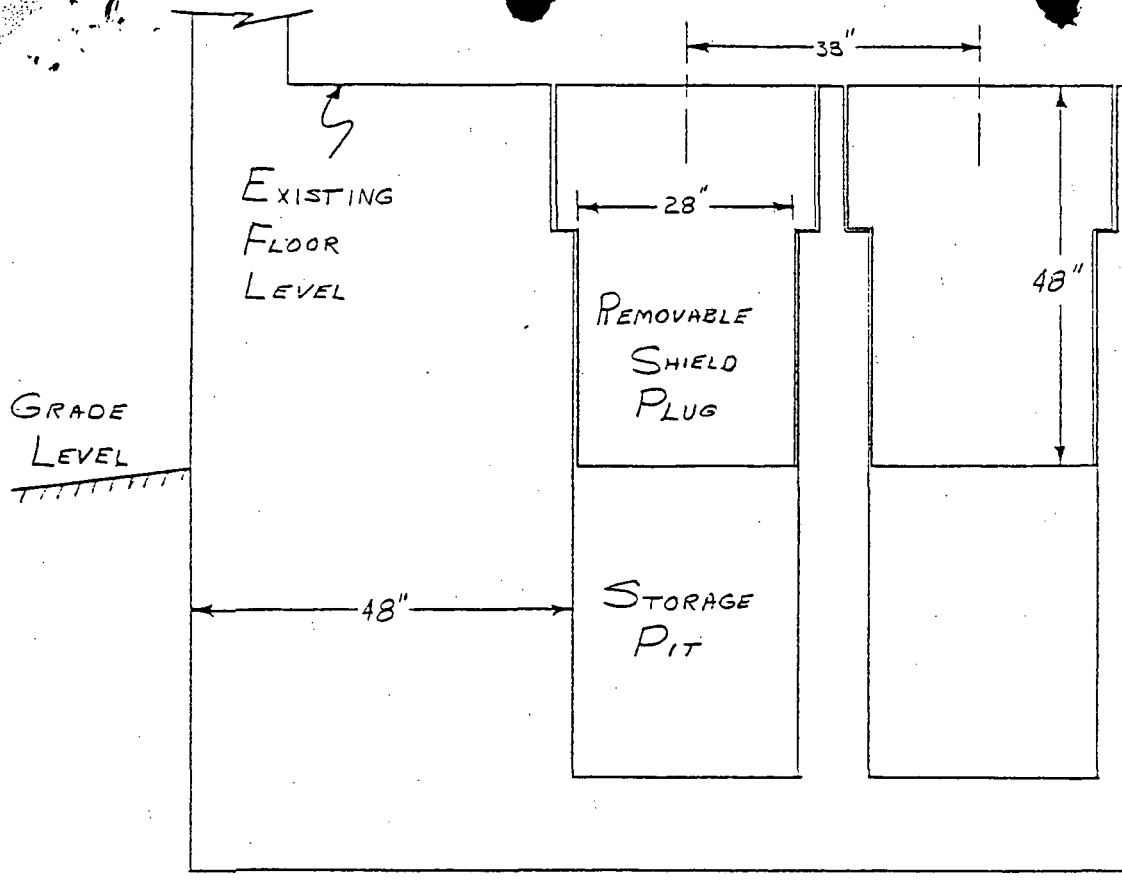


Exempt 10

Non-Exempt 53

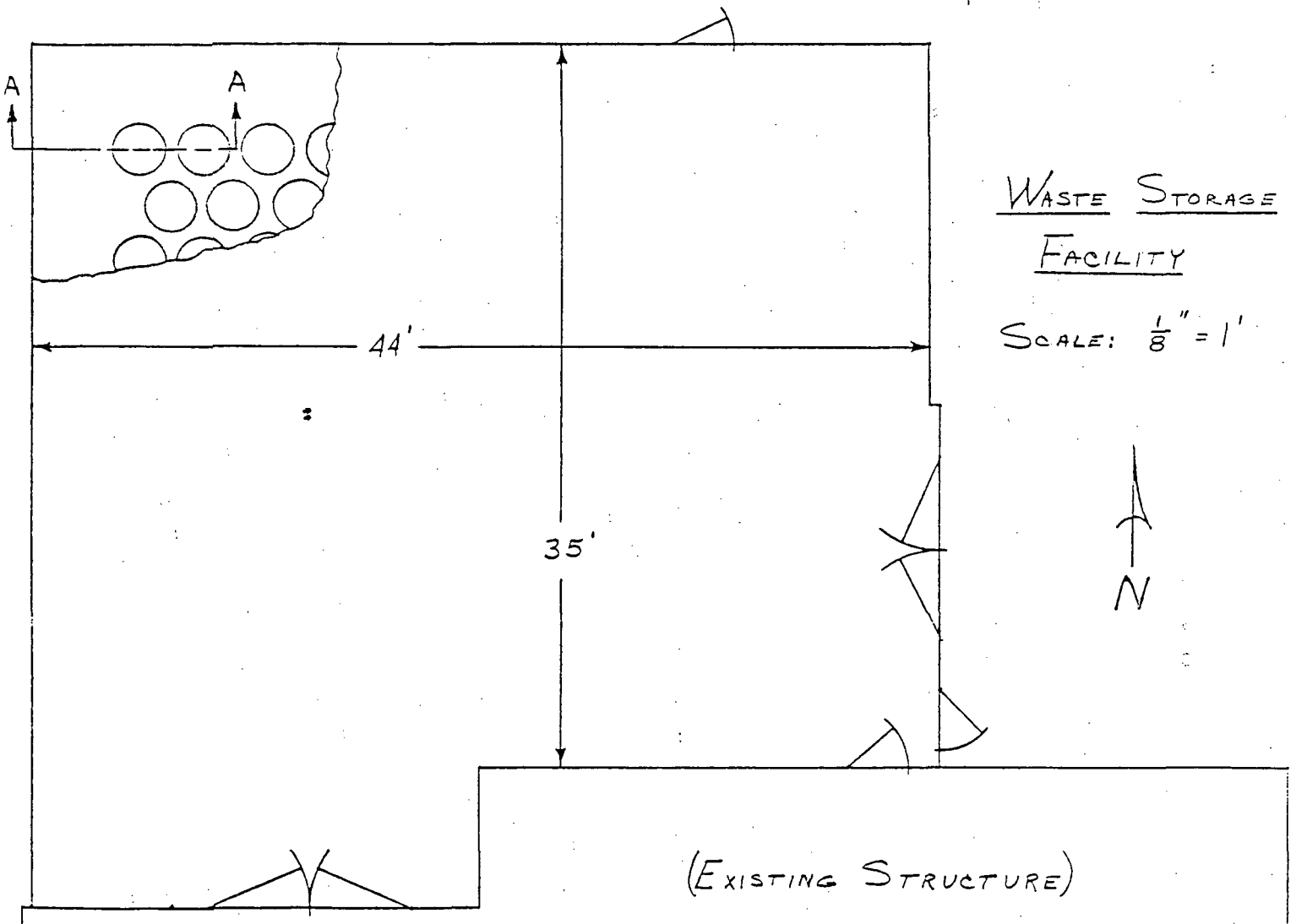
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ATTACHMENT 3



SECTION AA

SCALE: $\frac{1}{2}$ " = 1'



WASTE STORAGE
FACILITY

SCALE: $\frac{1}{8}$ " = 1'

