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 Docket File 70-687 w/o RG 3.52

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Docket No. 70-687

Union Carbide Corporation
 ATTN: Marcus H. Voth, Manager
 Nuclear Operations
 Medical Products Division
 P. O. Box 324
 Tuxedo, NY 10987

Gentlemen:

The purpose of this letter is to request additional information in order that we may complete our review and evaluation of your renewal application submitted on December 23, 1980. Since receiving your application we have visited your site twice to discuss various aspects of your operation and to clarify the nature of the information we need to complete our review.

On May 18, 1982 we indicated in writing the nature of your responsibilities under the three licenses you hold with the NRC and New York State. In addition, on December 9, 1981 we requested information related to our environmental assessment for your renewal application and on February 11, 1981 and June 29, 1982 indicated the information necessary to complete our review of your contingency planning. We are currently reviewing the information you provided on contingency planning on September 3, 1982 and your recent submittal on environmental information, dated October 21, 1982. The enclosure to this letter requests additional information related to our review of safety matters related to your special nuclear materials license. Satisfactory responses to this request will complete our review.

If you have any questions regarding this matter, please contact either Ms. Wendy Ting or Dr. A. T. Clark at 301-427-4205.

Sincerely,

Original signed by
 Leland C. Rouse

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

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Enclosure:
 Request for Additional Information

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OFFICE	FCAF	FCAF	FCAF	FCUF	ELD	SSPB
SURNAME	WWTing:flb	LCRouse	ATClark	FFisher	RFonner	HBernard
DATE	11/2/82	11/15/82	11/2/82	11/ /82	11/ /82	11/ /82

Request for Additional Information
Union Carbide Corporation
Tuxedo, New York
Docket No. 70-687

Consolidated Application

As we have agreed in our discussions, the most useful form for your submittal of safety information would be as a consolidated application, preferably in a loose leaf binder for ease of replacement for license amendment or updating. The information would include all previous documentation now referenced by date in your current license. The format to be followed, as we also have suggested, would be roughly that of Regulatory Guide 3.52, "Standard Format and Content for Uranium Fuel Fabrication Plant Applications." We have enclosed a copy of this recently issued Regulatory Guide for your use. The RG 3.52 format should be followed in Part I with proposed technical license conditions that state what performance requirements the UCC is committed to. Part II should consist of detailed safety information and descriptive information to provide a sufficient basis to support the conditions of the first section. Those sections which are not applicable, should not be addressed.

1. Conduct of operations (General Organizational and Administrative Requirements)

Please identify the organization within UCC having responsibility for radiological safety requirements, following the format of Section 2 of RG 3.52.

2. Radiation Protection

In addition to the environmental information you have provided, please provide a description of your radiation protection practices and procedures. Features should consider, but not be limited to the following:

- (a) Health Physics program audit;
- (b) establishment of Health Physics program procedures; and
- (c) posting requirements.

Also include from environmental information your description of ALARA principles and commitment pertaining to occupational and public exposure.

3. Nuclear Criticality Safety

Your proposed technical license conditions in Part I pertaining to nuclear criticality safety should accurately reflect your current limits and controls as approved by the Commission. Part II should provide sufficient background material which you have relied on to support your limits and controls in your requests to the Commission. It should adequately reflect all comments and considerations in our correspondence with you on nuclear criticality safety. Those aspects of nuclear criticality safety covered in Chapter 4, "Nuclear Criticality Safety," of RG 3.52, which do not fall within the context described above need not be addressed.

4. Waste Treatment and Packaging (Special Process Commitments)

Provide a description of UCC's waste treatment and packaging activities. Previously submitted information may be helpful. We expect that you will include a proposed technical license condition in Part I of your consolidated application which will establish likely limits to process variables and/or controls in your waste processing in order to provide positive assurance that final waste packages will meet future certification criteria for licensed disposal. Your discussion in Part II of your application should then provide detailed support, possibly in the form of radio chemical analytical results and calculations, sufficient to demonstrate that adherence to the licensing condition will assure acceptance. Upon formal establishment of burial ground criteria it is planned that your proposed technical condition limits would become effective.

5. Decommissioning Plan

Please include the information on the decommissioning plan which you have already provided for your reactor license amendment application as follows:

- (a) demonstration of the UCC financial commitment for operating and decommissioning the plant - (decommissioning commitment/unrestricted use);
- (b) the general precepts and techniques of your decommissioning plan; and
- (c) an estimate of the approximate cost for implementing the plan

6. Environmental Technical Specifications

The information you have provided on radiological environmental impacts will serve as a basis to support an environmental technical license condition. The condition itself should be included with other conditions you propose in Section One of your consolidated application. As a minimum, the condition should provide for a basic monitoring program.

Enclosure: R.G. 3.52



U.S. NUCLEAR REGULATORY COMMISSION

July 1982

REGULATORY GUIDE

OFFICE OF NUCLEAR REGULATORY RESEARCH

REGULATORY GUIDE 3.52
(Task FP 716-4)

STANDARD FORMAT AND CONTENT FOR THE HEALTH AND SAFETY SECTIONS OF LICENSE RENEWAL APPLICATIONS FOR URANIUM FUEL FABRICATION PLANTS

USNRC REGULATORY GUIDES

Regulatory Guides are issued to describe and make available to the public methods acceptable to the NRC staff of implementing specific parts of the Commission's regulations, to delineate techniques used by the staff in evaluating specific problems or postulated accidents, or to provide guidance to applicants. Regulatory Guides are not substitutes for regulations, and compliance with them is not required. Methods and solutions different from those set out in the guides will be acceptable if they provide a basis for the findings requisite to the issuance or continuance of a permit or license by the Commission.

This guide was issued after consideration of comments received from the public. Comments and suggestions for improvements in these guides are encouraged at all times, and guides will be revised, as appropriate, to accommodate comments and to reflect new information or experience.

-- Comments should be sent to the Secretary of the Commission, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, Attention: Docketing and Service Branch.

The guides are issued in the following ten broad divisions:

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| 1. Power Reactors | 6. Products |
| 2. Research and Test Reactors | 7. Transportation |
| 3. Fuels and Materials Facilities | 8. Occupational Health |
| 4. Environmental and Siting | 9. Antitrust and Financial Review |
| 5. Materials and Plant Protection | 10. General |

Copies of issued guides may be purchased at the current Government Printing Office price. A subscription service for future guides in specific divisions is available through the Government Printing Office. Information on the subscription service and current GPO prices may be obtained by writing the U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, Attention: Publications Sales Manager.
