



JAN 16 1981

SGML:RLJ
70-687

MEMORANDUM FOR: James G. Partlow, Chief
MC&A Licensing Branch

FROM: Raymond Jackson
MC&A Licensing Branch

THRU: Ronald Brightsen
MC&A Licensing Branch

SUBJECT: EVALUATION OF UNION CARBIDE - TUXEDO'S REVISED FNMC PLAN

The submittal was encouraged and made to accomplish:

1. Consolidation of 10 CFR 70.51 requirements into the FNMC Plan (10 CFR 70.57 and 70.58).
2. Incorporation of UC's approved highly enriched uranium recovery program (approved 8/6/80).
3. Updating to the current organization structure.
4. Change of the LEID (LEMUF) calculation Waiver threshold from 150 grams to 300 grams in accordance with 10 CFR 70.51(e)(5).
5. Omission of a specific number of hours, (16), of documented instruction that will be given to personnel responsible for the management and handling/processing of SSNM.

A sequence of events leading up to Union Carbide's final December 16, 1980 FNMC Plan submittal is as follows:

1. MCL received on 2/20/80 UC's request dated 12/28/79 to begin a uranium recovery program. The proposal was reviewed for MC&A requirements.
2. On 3/7/80, R. Brightsen and myself visited with UC personnel at the Tuxedo, NY site. The licensee was informed as to the necessary changes needed in their then current FNMC Plan before MCL approval could be given to proceed with their uranium recovery program. At this same meeting it was suggested to the licensee that, an updated July 1975 FNMC Plan, with partial revisions made during 1978, would be both advisable and desirable (the suggestions made are outlined above in 1, 3, 4, and 5).
3. On 4/3/80, a revised FNMC Plan dated 3/28/80 was received.

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4. With the assistance of H. Bartz the 3/28/80 submittal was reviewed. Our review comments were passed to J. McGovern, UC-Tuxedo, in a series of telecons between myself and Mr. McGovern.
5. On 5/15/80, UC-Tuxedo personnel J. McGovern, F. Morse and M. Voth visited with us to discuss their proposed uranium recovery process and to hand deliver a revision of the 3/28/80 FNMC plan, now dated 5/15/80. As a result of our meeting discussions and a cursory review of the 5/15/80 FNMC plan, it was suggested additional minor revisions be made.
6. On 7/8/80, as a result of the 5/15/80 meeting, a further revision of the 5/15/80 FNMC Plan was received.
7. In order to accommodate the licensee's desire to begin their uranium recovery process at the earliest possible date, Chapters 3.0, 4.0, and 7.0 were expeditiously reviewed.
8. On 8/6/80 the uranium recovery process described in the above mentioned FNMC Plan Chapters was approved (see attached MCL Evaluation Memo dated 8/5/80).
9. During October 1980 the remaining Chapters of the FNMC Plan submitted on 7/8/80 (see item no. 6) were reviewed.
10. On 11/17/80 I informed J. McGovern, UC-Tuxedo, that if minor changes were made to the FNMC Plan submitted on 7/8/80 the Plan would be acceptable. On 12/16/80 the final 5/15/80 revised FNMC Plan was received, reviewed and found acceptable.

UC-Tuxedo has significantly improved their FNMC Plan. As a result License Conditions 1.1, 1.2, 2.4, 2.5, 4.2, 4.3, 5.1, .5.2, 8.1, and 8.2 as stated in the 11/3/78 Amendment MPP-3, are now obsolete.

The attached letter and enclosure indicates that I recommend the approval of UC-Tuxedo's revised 5/15/80 FNMC Plan as attached to their 12/16/80 letter.

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Raymond Jackson
MC&A Licensing Branch

Enclosure:
As stated

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