



June 3, 2010

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Mr. John Buckley, Project Manager
Low-Level Waste and Decommissioning Projects Branch
Division of Waste Management
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Ref: Revisions to Phase 2 Decommissioning Plan
Docket No. 40-06563; License No. STB-401
Mallinckrodt, Inc., C-T Phase II Decommissioning Plan – Final

Dear Mr. Buckley:

As requested in your May 21, 2010 letter, Mallinckrodt, Inc. is submitting three minor revisions to clarify the Decommissioning Plan. Changes have been made to incorporate the following revisions:

1. Section 12.2 revised to state that Mallinckrodt will notify NRC if filtered water samples from excavations contain radionuclides exceeding the U.S. Environmental Protection Agency groundwater maximum concentration limit (MCL).
2. Section 12.3 revised to include the following statement, "If hazardous chemicals or mixed waste are identified during decommissioning activities, Mallinckrodt will notify the State of Missouri Hazardous Waste Program Permit Section. Mallinckrodt will dispose of all hazardous chemical and mixed waste in accordance with appropriate state and federal regulations."
3. Figure 3-8, Monitoring Well Locations revised to include the reference to support the boring log data

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06/02/2010
Mr. John Buckley

If additional information is needed to enable approval of the decommissioning plan, please contact me at (314) 654-5838.

Sincerely,



Karen Burke
C-T Decommissioning Project Manager

Cc: NRC Document Control Desk (enc)
Mr. John Buckley, U.S. NRC (enc)
Mr. Henry Morton, Morton Associates (enc)
Mr. Brenden Doster, MDNR (enc)
Mr. Aaron Schmidt, MDNR (enc)
Mr. Robert Geller, MDNR (enc)
Ms. Sharon Cotner, USACE (enc)

As in the case of radioactive solid waste discussed above, any aqueous radioactive waste generated during Phase II will be Class A. Mallinckrodt will notify the NRC if filtered water samples contain radionuclides exceeding the EPA MCLs.

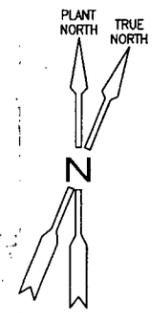
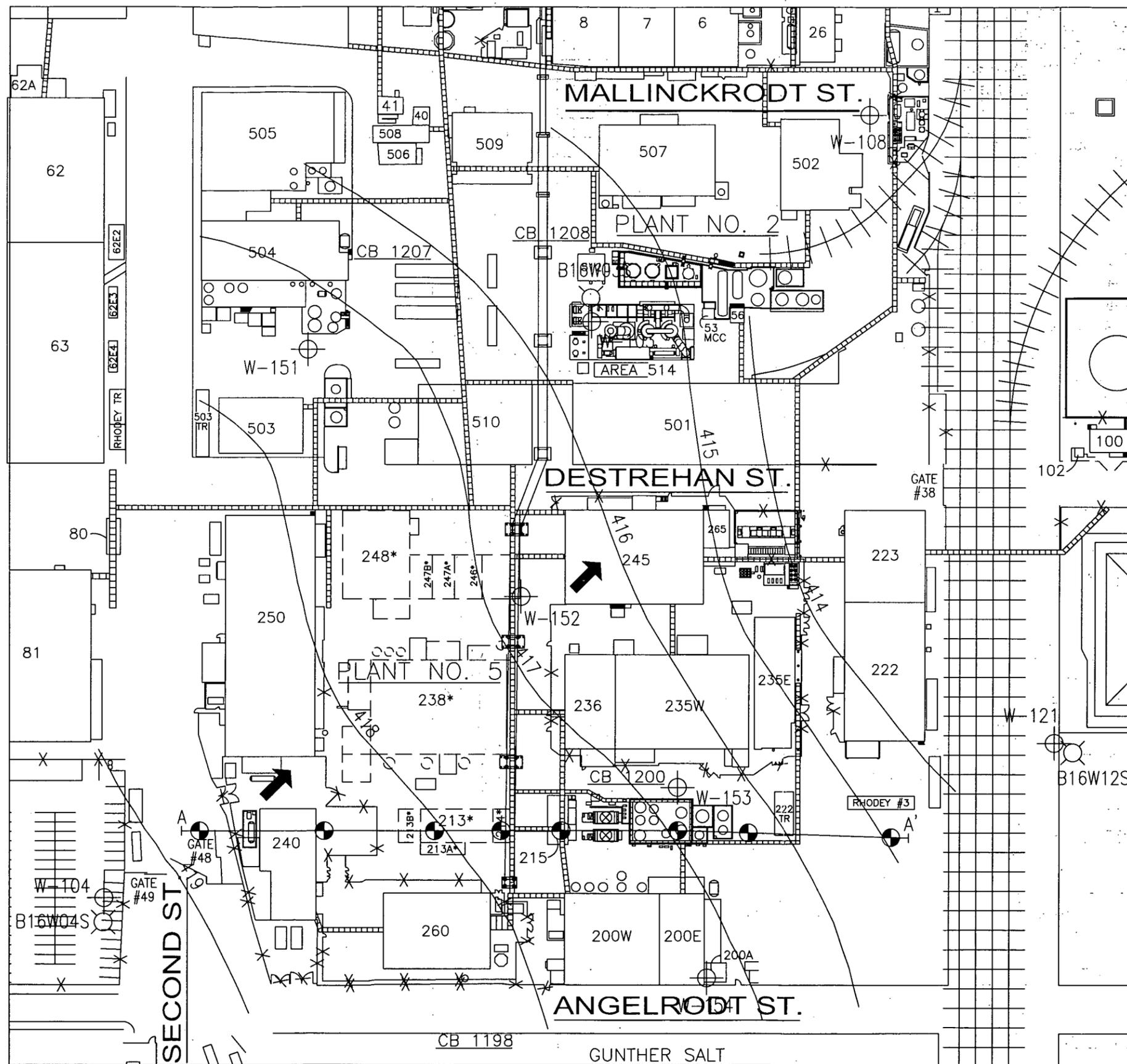
12.3. MIXED WASTE

Characterization efforts performed to date have not identified any mixed wastes in the soil or other materials to be remediated during Phase II. Mallinckrodt does not anticipate that mixed waste will be generated by decommissioning efforts. In the event mixed waste is identified during remediation activities, Mallinckrodt will characterize the wastes, identify a disposal method in accordance with appropriate state and federal regulations, assess the effect on the schedule, assess related disposal costs, modify handling procedures as needed and will notify the NRC. If hazardous chemicals or mixed waste are identified during decommissioning activities, Mallinckrodt will notify MDNR. Mallinckrodt has a RCRA Part B permit authorizing on-site storage of hazardous and mixed waste. Other than the presence of hazardous chemicals, storage in Mallinckrodt's hazardous waste storage facility, and the labeling and transportation requirements of RCRA and state hazardous waste agencies, mixed wastes will have the same radioactive character and will be managed as solid radioactive wastes described above.

As indicated above, a small quantity of radioactive waste that exhibits a hazardous characteristic may be treated in a container to eliminate the characteristic. Neutralization, stabilization, fixation, and solidification techniques may be used. Such treatment will typically be performed in the MMA.

12.4. RECORDS

Mallinckrodt will maintain records of waste material released from the C-T decommissioning area or controlled areas.



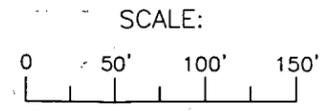
NOTES:

1. FIELD INFORMATION COMPILED ON JUNE 12, 1989
2. THE SOURCE FOR THIS DRAWING IS: BECHTEL NATIONAL, INC. SEPTEMBER, 1990. RADIOLOGICAL, CHEMICAL, AND HYDROGEOLOGICAL CHARACTERIZATION REPORT FOR THE ST. LOUIS DOWNTOWN SITE IN ST. LOUIS, MO. FORMERLY UTILIZED SITES REMEDIAL ACTION PROGRAM (FUSRAP) VOLUMES 1-3; REVISION 1. DOE/OR/20722-258.

LEGEND:

- ⊗ FUSRAP/DOE MONITORING WELL (1988)
- ⊕ MALCOM PIRNIE MONITORING WELL (1989)
- 414 WATER LEVEL CONTOUR, PERCHED GROUNDWATER
- ➔ GENERAL DIRECTION OF GROUNDWATER FLOW
- BORING DATA FROM PLANT 5 - LOADS & AREAS, WABASH DRILLING CO. MARCH 21, 1947
- A—A' LOCATION OF GEOLOGIC PROFILE

NOTE:
 * DESIGNATES DEMOLISHED UNDER PHASE I PLAN



NO.	DATE	ENGR.	DESCRIPTION
2	5/19/10		REVISED LEGEND INFO
1	03/31/03		GENERAL BACKGROUND UPDATING

MALLINCKRODT
 ST. LOUIS, MO.

ST. LOUIS PLANT
 MONITORING WELL LOCATIONS
 FIGURE 3-8

SITE	STL	PLANT ALL	BLDG. ALL	FLOOR N/A
SCALE	1"=50'			DATE 12/06/00
DR. BY:	J. MCMAHON			ENGR.

CHECKED: _____
 DRAWING NO. _____
 FIGURE 3-8

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