



August 25, 2011

Nuclear Regulatory Commission  
Decommissioning Branch  
US Nuclear Regulatory Commissions, Region III  
2443 Warrenville Road, Suite 210  
Lisle, IL 60532-4352

ATTN: George Michael McCann

RE: Status and direction of West Lagoon Closure

Dear Mr. McCann:

This confirms our phone conversation of yesterday, and summarizes our intent to pursue the closure of the west lagoon at our 7200 ABC Lane facility in Columbia, Missouri. This confirms the end of the 10.CFR.20.2002 process, states our intent to submit a dose analysis pursuant to 10.CFR.20.1402 and summarizes recent investigations and action concerning the analysis of monitoring wells near the lagoon.

As you are aware, it was our hope to use a local landfill to dispose of the sediment from the lagoon following a successful 10.CFR.20.2002 request for alternate disposal. However, the state of Missouri has indicated they will not permit the state landfills to accept this waste, irrespective of any NRC request approval, and irrespective of the very low radiological doses that would be involved. This is very disappointing, but has effectively truncated this effort; hence we ask that this request, previously submitted to the NRC be abandoned.

The path we will now pursue for release is by dose assessment, as described in 10.CFR.20.1402. I am well under way to have a RESRAD model of the lagoon soil, and should be able to share this shortly, in any case before September 30. This will be the basis of our 1402 request for unrestricted release. I am constructing a RESRAD model, and I can anticipate this will be submitted shortly, prior to September 30 of this year.

In our last monitor well sampling, we did see some detects of radiocarbon in the downgradient wells that ranged from 71 to 426 pCi/L. While these are well below the drinking water standard of 2,000 pCi/L, we did take some actions to prevent any future seepage, most importantly installing a filtered sump into the lagoon, removing the water to the sanitary sewer per 10.CFR.20 specification and we have repaired what we believe to be a flaw in the lagoon bottom that perhaps allowed some low level seepage to the monitoring wells. We will resample these monitoring wells in September, to see if we have succeeded. If indeed this effort is preventative of seepage, we will not consider any water borne contribution in our RESRAD model.

Please let me know if you have any questions.

Sincerely,

Bradly D. Keck, PhD, CHP  
Radiation Safety Officer, ABC Laboratories, Inc.

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