

July 26, 2012

Ms. Karen Burke, Director
Environmental Remediation
Covidien
Mallinckrodt, Inc.
675 McDonnell Boulevard
St. Louis, MO 63134

SUBJECT: ERRATA FOR NRC INSPECTION REPORT NO. 040-06563/11-003(DNMS) –
MALLINCKRODT, INC. ST LOUIS, MO DATED June 29, 2012

Dear Ms. Burke:

This is an errata to correct the June 29, 2012, U. S. Nuclear Regulatory Commission (NRC) inspection report which documented decommissioning activities performed under your license by your decommissioning contractor, AECOM Environment, at the Columbium-Tantalum (C-T) Plant 5 area, located within the Mallinckrodt St. Louis Plant, at 3600 North Second Street, St. Louis, Missouri.

Section 5.0, "Effluent and Environmental Monitoring (IP 84750)," b., "Observations and Findings," and the fourth paragraph of the Executive Summary of our inspection report inadvertently included a reference to the Missouri Department of Natural Resources (MDNR) and stated that the licensee ensured effluent release concentrations also did not exceed the MDNR release limits, which was incorrect. The MDNR does not regulate effluent releases from the Mallinckrodt decommissioning site.

Enclosed are revised pages of the inspection report that omits any references to MDNR effluent release concentration limits and correctly states that your discharge of waste water collected from the excavated trenches and pits, after filtration, did not exceed the NRC's Title 10 of the Code of Federal Regulations (CFR) Part 20 Appendix B effluent release concentration limits for the isotopes of concern.

We regret any inconvenience this may have caused.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

K. Burke

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Should you have any questions concerning these errata, we will be pleased to discuss them with you.

Sincerely,

/RA/

Christine A. Lipa, Chief
Materials Control, ISFSI, and
Decommissioning Branch
Division of Nuclear Materials Safety

Docket No. 040-06563
License No. STB-401

Enclosure:
As stated

cc w/encl: Mallinckrodt Service List

K. Burke

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Division of Nuclear Materials Safety

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Enclosure:
As stated

cc w/encl: Mallinckrodt Service List

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EXECUTIVE SUMMARY

Mallinckrodt, Inc. Phase II C-T Decommissioning Project NRC Inspection Report 040-06563/11-003(DNMS)

During this decommissioning inspection period, between December 15, 2011 and May 31, 2012, two onsite inspections were completed on December 16, 2011 and April 26, 2012 by regional inspectors. The inspections included an independent confirmatory survey of Survey Units (SU) 9 and 17, and in-process inspector reviews of the licensee's decommissioning activities and final status survey packages of completed survey units.

The licensee's routine decommissioning activities consisted of: (1) excavating contaminated soil, placing it into large polypropylene bags (super sacks), transporting the bags from the Plant 5 area to a railhead within the Mallinckrodt St. Louis Plant, temporarily storing onsite, and then shipping the waste for disposal; (2) conducting final status surveys (FSS); (3) water removal from excavated trenches and pits, and processing for disposal; and (4) operating an onsite laboratory in support of backfill activities.

During the inspection period, the licensee completed final status surveys and backfilled eleven survey units (SUs: 4 through 9, 14 through 17, and 20) within the Plant 5 area. The inspectors reviewed the final status survey packages of SUs 5, 6, 7, and 20 to ensure the licensee conducted the surveys in accordance with the U.S. Nuclear Regulatory Commission (NRC) approved Decommissioning Plan (DP) and work plans. The inspectors also reviewed the comparative analysis of onsite gamma spectroscopy with off-site confirmatory laboratory results to ensure the accuracy of the onsite laboratory; and did not identify any problems with the results. The licensee backfilled the survey units based on the screening results from the onsite laboratory.

Water, collected from the excavated trenches and pits, was removed and passed through a six stage filtration system; then analyzed and placed in large mobile tanks for disposal. The inspectors verified the activity per unit volume concentrations of radioactivity in the filtered water was less than the Title 10 of the Code of Federal Regulations (CFR) Part 20, Appendix B effluent release concentrations for the isotopes of concern.

As a result of legal and contract issues, the project's decommissioning schedule was significantly delayed due to a change in decommissioning contractors. The changeover from AECOM Environment to EnergySolutions is planned for June of 2012; the licensee committed to submit a transition plan to the NRC before the new contractor begins work, specifically describing how this changeover would not affect the DP, site-specific work plans and procedures, and all work completed for the project.

Decommissioning Inspection Procedure for Materials Licensees (IP 87104)

The licensee conducted decommissioning activities in accordance with the NRC approved DP, work plans, procedures, and NRC regulations. (Section 1.0)

5.0 Effluent and Environmental Monitoring (IP 84750)

a. Inspection Scope

The inspectors reviewed the air monitoring data results collected from the air monitors stationed around the Plant 5 area, and waste water discharge from survey unit 15 during calendar year (CY) 2012. The inspectors verified that the concentrations of radioactivity from the air sampling data and in the filtered water analytical results were less than the 10 CFR Part 20, Appendix B effluent release concentrations for the isotopes of concern.

b. Observations and Findings

During the inspection period, air sampling results did not exceed the 10 CFR Part 20 Appendix B release limits for air effluent concentrations.

Prior to discharge, waste water generated from rainstorm and below surface streams was collected from the excavated trenches and pits, passed through a six stage filtration system then analyzed and placed in large mobile tanks for disposal. The activity per unit volume concentrations of radioactivity in the filtered water was less than the 10 CFR Part 20, Appendix B effluent release concentrations for the isotopes of concern.

No findings of significance were identified.

c. Conclusions

The inspectors determined that the licensee's effluent releases did not exceed the 10 CFR Part 20, Appendix B release limits.

6.0 Inspection of Transportation Activities (IP 86740)

a. Inspection Scope

The inspectors reviewed two records of non-hazardous waste shipments: CTNH-0140-AECOM, and CTNH-0161-AECOM completed in accordance with the contractor's procedure CT-AECOM-RP-24, "Radioactive Protection Procedure, Classification and Shipment of Radioactive Materials," Revision 0.

b. Observations and Findings

All waste was shipped as non-hazardous unimportant quantities since the activities were below the DOT threshold for what is defined as radioactive materials, and therefore not regulated by DOT. No findings of significance were identified.

c. Conclusions

The inspectors determined shipments of excavated material were completed in accordance with the DP, work plans, procedures, and NRC and DOT regulations.