



August 15, 2014

Ms Kimberly Conway
US Nuclear Regulatory Commission
11545 Rockville Pike,
Rockville, MD 20852

Re: Docket 40-8610, Radioactive Materials License STC-1333

Dear Ms. Conway:

Stepan Company holds NRC Materials License STC-1333, Docket 40-8610 authorizing underground storage of thorium tailings in three burial pits on Stepan property at 100 West Hunter Avenue, Maywood, New Jersey.

Pursuant to a Cooperation Agreement and a Settlement Agreement between Stepan and the United States, the US Government took title to and took responsibility for this material. As documented in Post-Remedial Action Reports, the US Army Corps of Engineers (USACE) removed this licensed radioactive waste from Stepan's property and disposed of it at an authorized disposal facility. The Post-Remedial Action Report for each of the three NRC-licensed burials details the results of their decommissioning. Radioactivity surveys of the storage areas after cleanup demonstrated compliance with NRC regulation 10 CFR Part 20.1402.

As you are aware, the Settlement Agreement contains a provision regarding the termination of Stepan's NRC license. As set forth in the enclosed letter from Peter M. Flynn of the U.S. Department of Justice, the USACE has determined that Stepan may now seek termination of the license in conformance with the terms of the Settlement Agreement.

The Stepan Company, therefore, hereby requests termination of License STC-1333. A technical basis report supporting this request is enclosed herewith. Appendix A of the technical report, including the Final Status Survey Reports, is provided on an accompanying digital disc. Appendix B, an NRC Form 314 equivalent concerning disposal of radioactive waste, is provided with the technical basis report. Two copies of each are enclosed.

If any additional information is needed, please contact me by telephone at 201 712 7644, by e-mail at bpeacock@stepan.com, or by US Postal mail.

Sincerely yours,

Robert Peacock
General Manager

Enc: technical report
letter USDOJ, Peter Flynn

cc: Christina Loundy





U.S. Department of Justice

Environment and Natural Resources Division

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June 3, 2014

VIA EMAIL AND CONFIRMATION COPY

John McGahren
Morgan, Lewis & Brockius LLP
502 Carnegie Center
Princeton, NJ 08540-6241

Re: Stepan Company – Maywood Superfund Site

Dear John:

This letter responds to your emails concerning the 2004 Settlement Agreement (“Agreement”) between the United States and Stepan Company regarding the Maywood Superfund Site. Your inquiry concerns paragraph 8 of the Agreement which provides that “Stepan shall not request termination of the most recently issued NRC [Nuclear Regulatory Commission] storage license for radioactive waste until the Corps [Army Corps of Engineers] has completed its remedial activities on Stepan’s Maywood property.”

The March 31, 2014 letter you forwarded from James Moore, the Corps Project Manager for the Maywood Site, indicates that the Corps has completed remedial activities for the NRC licensed Burial Pits 1, 2 and 3, but has not completed remedial activities for other portions of Stepan’s property. After further discussions with the Corps, it is our view that Stepan is not prohibited by the Agreement from contacting the NRC to seek termination of its storage license as it pertains to the area of Stepan’s property containing the three Burial Pits.

Sincerely,

Peter M. Flynn
Senior Attorney

Cc: Tracy Gruis, Army Corps
Steven Miller, DOE