

September 15, 2015

Ms. Sara Parker Pauley, Director
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102-0176

SUBJECT: SOLICITATION OF MISSOURI DEPARTMENT OF NATURAL RESOURCES'
COMMENTS ON A DRAFT ENVIRONMENTAL ASSESSMENT WITH A
FINDING OF NO SIGNIFICANT IMPACT ASSOCIATED WITH THE
MALLINCKRODT FEBRUARY 12, 2015, LICENSE AMENDMENT REQUEST
(DOCKET NO. 40-6563)

Dear Ms. Pauley:

By letter dated February 12, 2015, the U.S. Nuclear Regulatory Commission (NRC) received a license amendment application from Mallinckrodt LLC (Mallinckrodt) to amend NRC Source Materials License No. STB-401. In this request, Mallinckrodt requests the option to perform direct dose assessment of residual radioactivity in addition to using derived concentration guideline levels (DCGLs) to demonstrate compliance with the license termination criteria in 10 CFR 20.1402 at the Mallinckrodt site in St. Louis, Missouri. The decommissioning plan that was previously approved for Mallinckrodt only included the use of the DCGL approach to demonstrate compliance with the license termination criteria.

An NRC administrative review, documented in a letter to Mallinckrodt dated April 9, 2015, found the license amendment application acceptable to begin a technical review. The NRC is completing that technical review and is considering granting Mallinckrodt's request. If approved, the NRC's approval would be documented in an amendment to Mallinckrodt's NRC License No. STB-401. However, before approving the proposed amendment, the NRC needs to make the findings required by the Atomic Energy Act of 1954, as amended, and the National Environmental Policy Act. These findings would be documented, respectively, by the NRC in a Safety Evaluation Report, and in a separate Environmental Assessment (EA). The NRC staff has prepared, in accordance with 10 CFR 51.21, an EA of the effects of this action.

A copy of the NRC's draft EA is enclosed for your review. Should the Missouri Department of Natural Resources (MDNR) have any comments or suggestions on these drafts, please provide them to me within 30 days from the date of this letter. We will presume that you have no comments if none are received within the 30 days.

In transmitting the draft EA to you, the cover letter, by itself, may be made publicly available. However, the draft EA document **should not** be made publicly available as the NRC considers the draft to be pre-decisional information. Accordingly, we have placed "Official Use Only – Predecisional Environmental Assessment" in the header/footer of the EA. Please limit distribution to staff within MDNR.

S. Pauley

- 2 -

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

If you have any further questions, please contact me at (301) 415-3650 or via email at Karen.Pinkston@nrc.gov.

Sincerely,

/RA/

Karen Pinkston, Systems Performance Analyst
Performance Assessment Branch
Division of Decommissioning, Uranium Recovery,
and Waste Programs
Office of Nuclear Material Safety
and Safeguards

Docket: 40-6563

Enclosure:
Draft Environmental Assessment

cc: Patrick Anderson, MDNR
Daniel Carey, MDNR

S. Pauley

- 2 -

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

If you have any further questions, please contact me at (301) 415-3650 or via email at Karen.Pinkston@nrc.gov.

Sincerely,

/RA/

Karen Pinkston, Systems Performance Analyst
Performance Assessment Branch
Division of Decommissioning, Uranium Recovery,
and Waste Programs
Office of Nuclear Material Safety
and Safeguards

Docket: 40-6563

Enclosure:
Draft Environmental Assessment

cc: Patrick Anderson, MDNR
Daniel Carey, MDNR

DISTRIBUTION:

E. Bonano, RIII

ML15246A158 (Pkg); ML15246A147 (Ltr); ML15246A148 (Enc)

OFFICE	NMSS	NMSS	NMSS	OGC	NMSS
NAME	KPinkston	CHolston	MNorato	SClark	KPinkston
DATE	09/03/15	09/03/15	09/03/15	09/14/15	09/15/15

OFFICIAL RECORD COPY