

NUCLEAR ENERGY PRODUCTS DIVISION

WILMINGTON MANUFACTURING

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May 24, 1979

Director

Office of Nuclear Material Safety & Safeguards U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Attention: Mr. W. T. Crow, Section Leader Uranium Fuel Fabrication Section Fuel Processing & Fabrication Branch Division of Fuel Cycle & Material Safety

Dear Sir:

Reference: NRC License SNM-1097, Docket #70-1113

With reference to activities conducted under SNM-1097 at the General Electric fuel fabrication plant in Wilmington, North Carolina, GE is authorized by License Condition 11 and by Section 1.6.4 of Appendix A to SNM-1097 to transfer liquid hydrogen fluoride solutions containing uranium which does not exceed three parts per million by weight of the liquid and which does not exceed four weight-percent enrichment in U-235, to a recipient not holding a specific NRC or Agreement State license for special nuclear material.

This letter is to inform you that General Electric is planning to contract with the following company to remove this liquid hydrogen fluoride solution from our plant site:

> Conservation Chemical Company 215 West Pershing Road, Suite 703 Kansas City, Missouri 64108

Attached is a copy of the letter to General Electric from Conservation Chemical Company, certifying that this liquid hydrogen fluovide solution will not be introduced directly into a human ingestion chain.

The estimated volume of this liquid hydrogen fluoride solution is less than 100,000 gallons per year. With a maximum permissible uranium concentration of 3-ppm and a maximum enrichment of 4% in U-235, the maximum amount of uranium in one gallon is limited to 0.013 grams (13 milligrams) and the maximum amount of U-235 is limited to 0.00052 grams (0.52 milligrams). Thus, the maximum quantities of uranium and U-235 in the 100,000 gallons that would be transferred as described above and in the attachment, are about 1,300 grams uranium and 52 grams U-235. These quantities are insignificant, especially since the uranium and U-235 are not removed from the solution during its use and since the solution is not to be utilized in manufacturing a product for human ingestion.

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We plan to transfer the first 4,100 gallons of liquid hydrogen fluoride (containing a maximum of 54 grams uranium and 2.2 grams U-235) as soon as possible. Therefore, I would appreciate your contacting me as soon as possible if you have any questions related to this matter.

General Electric personnel would be pleased to discuss this matter further with you and your staff as you may deem necessary.

Very truly yours,

GENERAL ELECTRIC COMPANY

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Arthur L. Kaplar, Manager Licensing & Compliance Audits M/C J26

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ALK: bmw

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Attachment



CONSERVATION CHEMICAL COMPANY

RECEIVED MAY 21 1379 Full Office Providence

May 16, 1979

106 West 14th Street Suite 2406 Kansas City, Missouri 64105 Area code 816-421-8494

42023

Mr. Earnest Jones General Electric P.O. Box 780 - Castle Hayne Road Wilmington, North Carolina 28401

Dear Mr. Jones:

This letter is in reference to our recent phone conversation regarding the disposition of the hydrofluoric acid that you have for disposal.

Conservation Chemical Company wishes to submit the following proposal for pickup of your waste hydrofluoric acid. We propose to pickup and dispose of your material for 5¢ per pound of HF. General Electric will agree to convey to Conservation Chemical Company the exclusive right, title and interest to this material for a period of five (5) years. We will accept the waste hydrofluoric acid at a twenty percent (20%) minimum concentration and a heavy metals content not to exceed 100 ppm, during the terms of the contract.

Conservation Chemical Company will remove all waste hydrofluoric acid under this agreement in suitable tank trailers at its own expense and incur all applicable related sales taxes and other costs for removal of this product which would be a proximately 96,000 gallons per year. Terms of payment are Thirty (30) Days Net from date of shipment.

We would deliver GE's waste hydrofluoric acid to a customer, Brush Wellman. They use waste hydrofluoric in the process of manufacturing ore and have provided a statement that they are not involved in producing any product which would be ingested by humans.

Disposal of the wastes generated in the use of their proprietery chemicals would be according to government regulations.

We hope this meets with your approval and look forward to picking up your waste hydrofluoric acid within the next two weeks.

Very truly yours, CONSERVATION CHEMICAL CO.

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Debra A. Geeslin Sales Director

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