

OCT 25 1989

Docket No. 40-7604

BP Chemicals America Inc.
ATTN: Mr. Daniel L. Isaacson
Environmental Engineering Specialist
Fort Amanda Road
P.O. Box 628
Lima, Ohio 45802-9983

Dear Mr. Isaacson:

This is in response to your letter of July 11, 1989, and to your telephoned request of October 10, 1989, for approval of your drum sampling plan. A modification of the sampling plan in your July 11, 1989 letter, which we consider acceptable, is as follows:

1. A representative sample will be taken from each drum.
2. Drummed waste will be grouped according to type (i.e., sandblast media, floorsweepings, concrete, oil dry, soil, etc.)
3. Composite samples will be generated from each group. Composite will contain no more than 20 samples.
4. Composite samples will be analyzed for pCi/g content of depleted uranium.
5.
 - a. Drums represented by composite samples containing less than 35 pCi/gm depleted uranium will be disposed of in a non-radioactive manner.
 - b. Drums represented by composite samples containing greater than 35 pCi/g will be resampled and individually analyzed for pCi/g content. Any drum containing depleted uranium in excess of 35 pCi/g may either be recycled/reused in future decontamination activities, or disposed offsite in an approved low-level radioactive disposal site. Any drums containing less than 35 pCi/g depleted uranium will be disposed of in a non-radioactive manner.
6. Approximately 10% or 10 to 15 samples will be sent to a second laboratory for quality assurance and quality control.

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Although we have not found any specific defect in the concept of disposing the less-than-35 pCi/g material in your pond closure, we have not given the pond closure itself enough attention to decide that it constitutes an acceptable disposal approach.

Original Signed by
Jerry J. Swift

Jerry J. Swift, Section Leader
Advanced Fuel and Special
Facilities Section
Fuel Cycle Safety Branch
Division of Industrial and
Medical Nuclear Safety, NMSS

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