

from the
Office of The Mayor



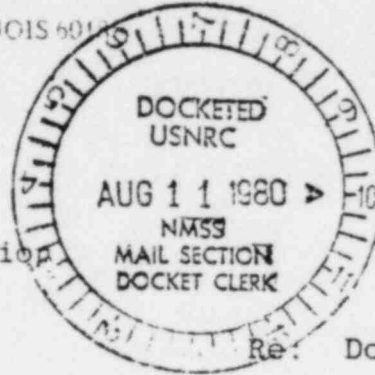
A. EUGENE RENNELS
Mayor

The City of West Chicago

July 29, 1980

ILLINOIS 601

Mr. William A. Nixon
Uranium Fuel Licensing Branch
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



Re: Docket No. 40-2061

Dear Mr. Nixon:

We have reviewed the proposed plan of Kerr-McGee Chemical Company relevant to a permit for the installation of an incinerator in West Chicago for the purpose of reducing the volume of Thorium contaminated material to be disposed of by burial. In our analysis of the proposed plan, the City has certain restrictions and objections to these plans as submitted, and requests additional information to be placed in the plan.

The information requested from Kerr-McGee prior to the issuance of the license permitting the incineration is as follows:

1. Kerr-McGee should be required to state explicitly the Isotopes to be incinerated. Although one can infer that only Thorium and Thorium Daughters will be incinerated, this does not appear to be explicitly stated in the application.
2. The application states the expected efficiency of the bag house filters and high efficiency filters. The application does not say whether these efficiencies are in a mass or particle count basis, and this should be stated.
3. In Section E of the application, there is an implied commitment to "seldom exceeding 25% of the MPC". However, there are no calculations presented showing what the actual effluent of the stack will be based upon the intended activity to be incinerated.

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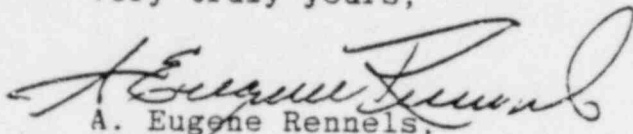
This concentration should be stated as well as the concentration at the nearest occupiable unrestricted areas. This should be done to demonstrate that the effluents are in accordance with the requirements of Section 20.106 of 10CFR, Part 20.

4. Additional information regarding the incinerator, such as the height of the stack and the location of the nearest accessible unrestricted areas should be added. The rated air flow of the incinerator should also be specified.
5. A specific procedure for handling and disposing of ash should be added. We insist that all ash be removed from the site for disposal as radio active waste at a burial site.
6. Safety procedures to be followed during all phases of operation, including phases where ash is handled should be added.
7. Evidence that all State and local regulations concerning incineration of radio active material have been met, must be submitted.
8. The maximum number of burns to be performed in a week, and a year, should be specified.
9. An explicit statement of commitment ALARA should be required in this application (ALARA stands for As Low as Reasonable Appealable, which is the philosophical requirement for all operations which could contribute the radiation dose to individuals.)
10. An estimate of the dose to the public should be included for emergencies such as the release of material resulting from a fire in the bag house or high efficiency filters.

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These requirements are consistent with the requirements the Nuclear Regulatory Commission imposes upon other applicants for amendments to license to permit incineration of radio active waste, and we do insist that the same be required of Kerr-McGee for their facilities in West Chicago.

Very truly yours,


A. Eugene Rennels,
Mayor

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