UNC RECOVERY SYSTEMS -> Luticher

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Division of United Nuclear Corporation A UNC RESOURCES Company

CEB: 80-106

June 26, 1980

U. S. Nuclear Regulatory Commission Mr. George McCorkle, Chief Physical Security Licensing Branch 7915 Eastern Avenue Silver Spring, MD 20910

Dear Mr. McCorkle:

UNC Resources has decided to terminate recovery of highly enriched uranium at this facility. The scheduled date for achieving an inventory of less than five kilograms of Uranium 235 enriched twenty percent or more is not later than November 30, 1980. The lessthan-five-kilogram amount will not include the waste lagoon solids (see Attachment I for a description) and trace quantities remaining within the process area after the processing equipment has been cleaned.

One Narragansett Trail

Wood River Junction, Rhode Island 02894

The projected date for achieving an inventory of less than five kilograms of SNM occurs shortly after the date that recent rule changes to 10CFR 73 require the submission of a performance-oriented safeguards protection plan. For this reason, any advantages from expending the resources required to comply with 10CFR 73.20, 73.45 and 73.46 do not appear commensurate with the expense. Waiver of the requirements would not, in our opinion, jeopardize the common defense and security.

Accordingly, under the provisions of 10CFR 73.5, we respectfully request that UNC Recovery Systems (License SNM-777) be exempted from the requirements contained in 10CFR 73.20, 73.45 and 73.46. My staff or I will be pleased to discuss this request for exemption in detail should the need arise.

Sincerely, UNC RECOVERY SYSTEMS

President

CEB: DMS:ddm

Enclosure (Attachment I)

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Applicant.. Amount/Fee Category. Type of Fce. . must Date Check Rec'd. // Received Ey

ATTACHMENT I

DESCRIPTION OF LAGOON SOLIDS

The lagoon solids are a result of neutralizing the Extraction Raffinate Stream with calcium carbonate. The raffinate stream is primarily composed of nitric acid, hydrofluoric acid, aluminum hydroxide, and dissolved salts of zirconium, thorium, niobium, tungsten, silicon, and uranium in varied amounts. The uranium content is reduced to less than one hundred parts per million prior to neutralization. The neutralization results in precipitation of solids which consist primarily of calcium nitrate, calcium fluoride and aluminum oxide. Any liquid effluent is separated and evaporated. The estimated uranium content of the precipitate is a uniformly distributed 0.02 grams per pound of dry solids, which is less than five grams of uranium in any cubic foot of contents (LSA material). The Uranium 235 enrichment of the lagoon solids is estimated to be approximately eighty five percent.