



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

PAR

FEB 11 1981

WMUR:RSH
Docket No. 40-8722
SUA-1354



Brush Wellman Incorporated
ATTN: Mr. James R. Zuehlke
Senior Engineer
P. O. Box 815
Delta, Utah 84624

Gentlemen:

Our review of your "Plan for Decommissioning Uranium Recovery Circuit", dated November 15, 1979, as per Source Material License SUA-1354, Condition No. 27, has shown that additional information is required prior to NRC approval of this plan. The plan submitted by Brush Wellman Incorporated (BWI) is too cursory and requires a much more detailed description of decontamination and reclamation procedures.

In order to meet the objectives required by the NRC for decommissioning refer to Appendix J of the "Generic Environmental Impact Statement on Uranium Milling", (GEIS), NUREG-0706, Volume III, dated September 1980. Although the referenced document provides the EPA interim standards for performance objectives for cleanup of offsite open lands and buildings due to inactive mills the NRC staff believes the same criteria are appropriate for decommissioning of currently active facilities like that of BWI.

In addition, the following items should also be addressed by BWI in a revised and updated plan submitted for NRC approval.

1. The cost estimates which a contractor would charge for (a) removal and either decontamination or burial of process facilities; (b) reclamation of the site property and evaporation ponds; and (c) reclamation of support facilities such as access roads.
2. The estimated cost for a radiological survey to determine compliance following total site decommissioning and reclamation.
3. Once the above 2 items have been addressed you should incorporate an inflation adjustment for the years of operation preceeding the next license renewal to arrive at the total projected costs of decommissioning.

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Brush Wellman Incorporated

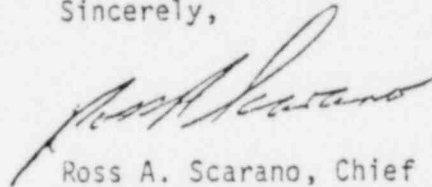
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The submittal should also detail financial arrangements that will be made in the form of "surety bonds" to ensure that adequate funds are available to cover the costs listed in items 1 through 3 in the event the licensee defaults prior to performance of reclamation. For additional information in developing "surety arrangements" refer to applicable parts of Chapter 14 of GEIS, NUREG-0706, Volume I, dated September 1980.

In order to assure incorporation of an approved plan into your license we require Brush Wellman Incorporated to resubmit a revised plan incorporating the above mentioned items by April 3, 1981. If there are any questions, please do not hesitate to contact me or Mr. Ralph Heyer of my staff at (301)427-4103.

Sincerely,



Ross A. Scarano, Chief
Uranium Recovery Licensing Branch
Division of Waste Management