KM/CHICHI-MEM

MEMORANDUM FOR:

Vandy Miller, Assistant Director

JAN 3 0 1990

State Agreements Program

State Programs

FROM:

John J. Surmeier, Chief

Technical Branch

Division of Low-Level Waste Management

and Decommissioning, NMSS

SUBJECT:

CHICHIBU'S SEPIC HIC TOPICAL REPORT; REVISION 2.1; WM-81

Enclosed are two letters to Chichibu Cement Company approving Revision 2.1 to the subject topical report. In our original review of the topical report, we approved seven types of applications (uses) for the HICs. Revision 2.1 to the Topical Report and Use Manual includes an eighth ase, namely, to contain absorbed liquids. This eighth use is added to the previously approved seven uses. The original approval letter, dated November 20, 1989 (attached), has been accordingly modified per the January 16, 1990 letter (also attached). The approval and modification are described in these two letters. Also enclosed are three sets of revised pages to the topical report and use manual.

Please transmit a copy of this information to affected Agreement State licensing authorities so that they can make the stated revisions to their existing copies. If you have any questions or need additional copies of the revised pages, please contact Keith McDaniel of my staff at X23448.

(SIGNED) JOHN J. SURMEIER

John J. Surmeier, Chief Technical Branch Division of Low-Level Waste Management and Decommissioning, NMSS

Enclosures: As stated cc: Cardelia Harvey-Maupin Distribution: Central file # wm- 81 MTokar LLTB r/f JSurmeier KMcDanie1 NMSS r/f PLohaus JGreeves RBangart RBoy le PDR Yes: PDR Reason: Proprietary / / or CF Only / / ACNW Yes: No: SEE SUBJECT OF MEMORANDUM SUBJECT ABSTRACT: : LLWM OFC : LLTE NAME: KMcDanie 1/1j : JSurmeier :MTokar DATE: 1- 79-90 003280170 900130 DR WASTE

OFFICIAL RECORD COPY

Mr. Osamu Suzuki
Chichibu Cement Co., Ltd.
c/o Mr. Homer Lowenberg
Lowenberg Associates, Inc.
10901 Rosemont Drive
Rockville, MD 20852

JAN 1 8 1990

Dear Mr. Suzuki:

In our letter dated November 20, 1989, we approved the stated revisions to Chichibu's SFPIC HIC Topical Report and Use Manual (designated together as Revision 2.1 to the Topical Report). It has come to our attention, through discussions with your representative, Mr. Homer Lowenberg, that the wording of page 1, sub-sentence (b) of our approval letter should be modified by changing the first "and" in the sentence to "or" in order to meet Chichibu's full intent of the revisions. Mr. Lowenberg stated that one intent was to require that absorbed liquids be compatible with the types of liquids that have been certified by (a) Chichibu's chemical tests performed on actual HIC concrete samples, "or" (b) supplier's chemical tests performed on their impregnating and sealant materials. Our approval of November 20, 1989 would have required the liquids to be certified by both Chichibu's chemical tests and the supplier's chemical tests.

Because the supplier's chemical tests involve the testing for compatibility of various chemicals with the same material that is used as the sealant for the actual HIC material, the supplier's tests are considered equivalent to the Chichibu tests; therefore the modification is acceptable. Due to our recent approval of Revision 2.1 of the topical report, this letter will not result in an additional formal revision; rather it serves as a notification to interested parties of the modification so that the change can be incorporated into their documentation. The topical report should continue to be designated as Revision 2.1.

If you have any questions, please contact Keith McDaniel at (301) 492-3448.

Sincerely, Original Signed By

Michael Tokar, Section Leader Technical Branch Division of Low-Level Waste Management and Decommissioning, NMSS

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NOV 3 0 1989

Mr. Osamu Suzuki Chichibu Cement Co., Ltd. c/o Mr. Homer Lowenberg Lowenberg Associates, Inc. 10901 Rosemont Drive Rockville, MD 20852

Dear Mr. Suzuki:

In your letter dated September 6, 1989, you requested NRC approval to revise the SFPIC HIC Topical Report and Use Manual to include an eighth use to contain absorbed liquids. This eighth use would be added to the already approved seven uses currently identified for Chichibu's high integrity container (HIC). After reviewing the rationale that you presented to justify this additional use, we concur that this HIC should be a suitable container for disposal of absorbed liquids on the following bases:

- a) Liquids shall be absorbed in approved volumes of approved absorbents, and
- b) Liquids shall be compatible with the types of liquids that have been certified by (i) Chichibu's chemical tests performed on actual HIC concrete samples. (ii) supplier's chemical tests performed on their impregnating and sealant materials.

During our discussions on this modification to the subject topical report with your consultant, Mr. Homer Lowenberg, we further requested that you take steps to bring all volumes of this topical report up to date with the same revision number. Accordingly, it was agreed that this would be accomplished as noted below.

1) This topical report entitled, Topical Report For High Integrity Container 200 1/400 1 for Disposal of Low-Level Radioactive Wastes, will consist of three parts as follows:

Part I - Non-proprietary - NP (previously Volume I),
Part II - Proprietary Appendices - P (previously Volume II),
Part III - Use Manual - NP (previously Use Manual)

Two versions of the report will be prepared. The proprietary version consists of all three parts. The non-proprietary version consists of Parts I and III.

- A new cover and title page for each part of the topical report will be provided indicating Revision 2.1 - November 1989.
- 3) In addition to revising page 9 of Part I-Non-Proprietary and pages 8 and 9 of Part III-Use Manual to cover the above new approved use for absorbed liquids, the following revisions will also be made to Part I to complete this updating since Part I is considered the overall document:
  - a. The table of contents of Part I will be revised to include the page numbers of the tables of contents of all three parts.

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- b. The tables of contents of all three parts will be included in Part I.
- c. The Abstract will be revised to explain that the topical report consists of two versions; the proprietary version and the non-proprietary version.

On this basis the current version of all three parts of this topical report will be Revision 2.1 of November, 1989. Any future revisions of this topical report will start with revision 3. and will include appropriate revisions to all three parts of the topical report so that all three parts will have the same revision number at all times.

Therefore permission to make the requested revision to cover the absorbed liquid use to Part I-Non-Proprietary page 9. and Part III - Use Manual pages 8. and 9., is granted.

It should be noted that revisions to a topical report are administratively handled in a manner similar to original submittals. In this regard, we acknowledge receipt of your payment of the standard topical report submittal fee of \$150 to cover this revision. In addition, any staff time associated with the review will be directly charged to Chichibu Cement Inc.

If you have any questions, please contact Keith McDaniel at (301) 492-3448.

Sincerely.

Michael Tokar, Section Leader Technical Branch Division of Low-Level Waste Management and Decommissioning

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