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**ENVIROCARE** OF UTAH, INC.  
THE SAFE ALTERNATIVE

November 5, 1993

Mr. Timothy C. Johnson  
US Nuclear Regulatory Commission  
Mail Stop 5E4  
Washington, DC 20555

Dear Mr. Johnson:

As I indicated during our telephone conversation, the Site Remediation Plan for Chemetron's Harvard Avenue and Burt Avenue sites, submitted to NRC by B. Koh & Associates and dated October 1993, contains inaccurate information in section 1.7.2.2 (pages 1-21).

It is stated that the current cost for transportation and disposal at an off-site facility ranges from \$35.00 to \$300.00. Envirocare informed Mr. Barry Koh, in a May 12, 1993, letter that the 1993 cost of disposal at Envirocare for large volumes of soil, as is the case for Chemetron, is less than \$13.00 per cubic foot. Furthermore, in early 1993, a remediation contractor estimated that the total excavation, transportation, and disposal at Envirocare for 1.1 million cubic feet of radioactive contaminated material at Chemetron will be \$18 million or \$16.36 per cubic foot. This data was presented in the GAC report on Chemetron in June of 1993 and is consistent with Envirocare's quote for disposal. It should be noted that both estimates are far less expensive than the quotes in the Site Remediation Plan for Chemetron.

It is noted in the above mentioned report that off-site disposal is not preferable since the capacity at commercial disposal facilities is limited and these facilities are designed for higher curie content. Envirocare is specifically designed for large volumes of Decontaminated & Decommissioned material and is licensed to accept only limited curie content. Envirocare's current volume capability would allow for the disposal of numerous projects as large or larger than Chemetron.

It is stated in the report that the highway transportation risk is of concern. Though, initially B. Koh & Associates proposed highway as a possible transportation means, Envirocare proposed, and is capable of accepting, the material by rail which will pose minimum transportation risk.

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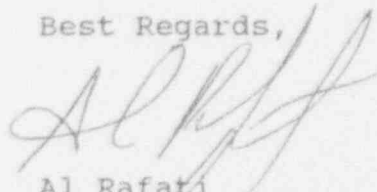
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Timothy C. Johnson

I appreciate your consideration of these clarifications. Envirocare of Utah stands prepared to assist in cleaning up the Harvard & Burt Avenue sites if it is requested by the licensee. If I can provide further information, please give me a call.

Best Regards,

A handwritten signature in cursive script, appearing to read 'Al Rafati', written in dark ink.

Al Rafati  
Director, Business Development