



SHIELDALLOY METALLURGICAL CORPORATION

Misc  
(58 FR 62384)

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January 14, 1994

Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attn: Docketing and Service Branch

RE: Decommissioning of Shieldalloy Metallurgical Corporation Facility in Cambridge, Ohio: Notice of Intent to Prepare an Environmental Impact Statement and to Conduct a Scoping Process

Dear Secretary:

Shieldalloy Metallurgical Corporation (SMC) is submitting written comments regarding NRC's Public Notice and our recommendations for modification to the subject scope. It is requested that NRC and its contractor utilize these enclosed comments and recommendations for the development of the Environmental Impact Statement (EIS). SMC's specific comments or recommended changes to NRC's Public Notice are attached.

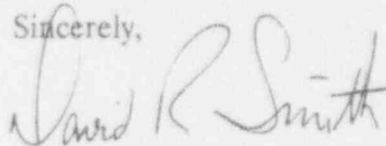
SMC is in receipt of the Official Transcript of Proceedings to Public Scoping Meeting on the Environmental Impact Statement (EIS) for Shieldalloy Metallurgical Corporation Facility -- Cambridge, OH on December 13, 1993 at the Meadowbrook High School, Byesville, Ohio. We plan to prepare and submit to NRC under separate correspondence our comments and responses to the testimony presented. It became quite evident from listening to various speakers and then reading the transcript that the local community supports in-situ decommissioning as evaluated and selected by SMC's Technical Basis Document for Decommissioning at the Cambridge, Ohio Facilities (IT/NS-93-108, May 1993). SMC is confident that NRC's EIS will also support and recommend this same method for decommissioning of the Cambridge facility.

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If you have any questions regarding these comments, please do not hesitate to contact myself or Mr. C. Scott Eves at 609-692-4200.

Sincerely,  
  
David R. Smith

DRS:lms

Enclosure

CC: Cambridge and Byesville Business Leaders and Elected Officials  
OEPA, ODOH, NRC Region III, USEPA Region V  
United Steel Workers Local 5050, John Sedor, President  
Speakers from the various Environmental Groups

**Comments to NRC's Public Notice for the Decommissioning  
of Shieldalloy Metallurgical Corporation's Facility in Cambridge, Ohio:  
Notice of Intent to Prepare an Environmental Impact Statement  
and to Conduct a Scoping Process [7590-01]**

References

- (1) Decontamination and Decommissioning Plan for the Shieldalloy, Cambridge, Ohio Plant (ERT, 1987)
- (2) Radiological Survey of the Shieldalloy Corporation Site, Cambridge, Ohio (USNRC, July 1988) - ORAU 88/D-23
- (3) Shieldalloy Metallurgical Corporation, Cambridge, Ohio Radiological Characterization Plan (ENSR, 1989)
- (4) Shieldalloy Metallurgical Corporation, Cambridge, Ohio Decontamination Report, License SMB-1507, License Amendment (ENSR, January, 1990)
- (5) Shieldalloy Metallurgical Corporation, Cambridge, Ohio West Pile Decommissioning Plan (ENSR, February 1990)
- (6) Confirmation Survey of the Shieldalloy Metallurgical Corporation Cambridge, Ohio (USNRC, May 1991) - ORAU, Docket No. 40-8948
- (7) Shieldalloy Metallurgical Corporation Technical Basis Document for Decommissioning at the Cambridge, Ohio Facilities (IT/NS-93-108, May 1993)

**Page 1, Summary, line 3:** Change sentence beginning with "Shieldalloy" to read as follows: Shieldalloy's predecessor companies (Vanadium Corporation of America and Foote Mineral) at the Cambridge location had been licensed...

**Page 1, Summary, line 7:** Delete "the facility concentrated".

**Page 1, Summary, line 8:** Insert after the word "materials" "was segregated into high temperature slag".

**Page 1, Summary, line 8:** Insert the following sentences after the sentence above:

In 1973, Foote Mineral requested that NRC terminate their license for possession and storage of source material. The property was acquired by Shieldalloy Metallurgical Corporation in 1987 and the source materials license; SMB-1507, was obtained by Shieldalloy in May of 1987 (see SMC letter of February 20, 1990, attached).

**Page 1, Summary, line 8:** Change "no longer" to "has never".

**Page 1, Summary, line 11:** Insert new sentence after "site":

SMC has completed the decontamination of buildings, equipment, and soils, and consolidated the source material from this decontamination effort onto the West Pile. This effort was documented by SMC's Decontamination Report (Reference (4)). NRC verified that the site decontamination effort performed by SMC had been very effective as reported in reference (6), "Confirmatory Survey of the Shieldalloy Metallurgical Corporation Site, Cambridge, Ohio", prepared by Cotton, Oak Ridge Associated Universities, dated May 1991 (Docket No. 40-8948).

**Page 4, Need for Proposed Action, 1st paragraph, line 12:** SMC questions how NRC derived the quantity of material stored in the piles. The volumes and tonnage of the piles are inconsistent with the reports and information submitted to NRC by SMC since 1987 until the present time, References 1 through 7.

**Page 4, 2nd full paragraph, after 1st sentence:** Insert "Use of source material ceased in 1971 and Foote Mineral Company requested the termination of their NRC license in 1973".

**Page 4, 2nd full paragraph, 2nd line:** Change sentence to read as follows: Shieldalloy has been engaged in decontamination and decommissioning efforts since the acquisition of this site in 1987 in preparation for requesting the NRC to terminate the license...

**Page 6, 2nd paragraph:** General comment and statement - At the time SMC acquired the facility NRC had four decommissioning options available to its licensees for decommissioning and termination of their license. Since that time the NRC requirements changed and now only options 1 and 2, which do not allow for land use restrictions, are available. Options 3 and 4, which were available previously, did allow for land use restrictions as part of the closure plan.

**Page 6, 3rd paragraph, line 5:** Insert in sentence after "OHEPA": SMC has undertaken the groundwater and surface water monitoring program in collaboration with NRC, USEPA, Ohio EPA, and Ohio Department of Health to obtain data and information to address the viability of decommissioning of these materials in-situ and to assure other environmental issues and concerns are not being adversely impacted.

**Page 9:** After first full paragraph, insert new paragraph:

Shieldalloy Metallurgical Corporation requests that NRC and its contractor in their efforts to develop the subject environmental impact statement for decommissioning of the source materials in-situ, utilize and consider data and alternatives presented in previous documents submitted by the company.

**Page 10, 4.2(a), line 3:** Eliminate "in a single pile that" and insert "and".

**Page 11, 4.2(b), line 5:** SMC questions if there is a viable facility which possesses the necessary license and physical requirements for disposal of the radioactive material within 50 kilometers of the site. SMC is unaware that Ohio or any states within its Mid-West Compact have sited a facility for low-level waste disposal. The only site which SMC is currently aware of that could accept this quantity of material and may possess an appropriate NRC license or state equivalent license is Envirocare in Utah.

**Page 11, 4.2(c):** Same comment as above.

**Page 12:** Insert paragraph after 4.2(e), labelled 4.2(f): Alternative 6, Develop Commercial Use and Market for Radioactive Slag. The slag could be sold to NRC licensed facilities or NRC could exempt the licensing requirement for a specific use or export the material.

**Page 14, paragraph (d), lines 6, 7, and 8:** SMC questions the appropriateness of NRC's decision to develop an EIS for the decommissioning of the waste piles at Shieldalloy's facility in Newfield, New Jersey at this time since Newfield is currently an active site, processing source material in the production of ferroalloys.

**Page 15, paragraph (f), lines 8-10:** SMC requests clarification of the purpose and intent of its statement regarding termination or postponement of the development of the EIS due to the status of the financial restructuring under Chapter 11.