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Harold D. Thornburg, Chief, Field Support and Enforcement Branch Directorate of Regulatory Operations, HQ

W. R. GRACE AND COMPANY
DAVIDSON CHEMICAL DIVISION
POMPTON PLAINS, NEW JERSEY 07444

Subject inspection report is enclosed for your action. Two closeout surveys were made by our inspector. The first revealed that the licensee's submittal to Licensing did not accurately reflect true conditions. The second closeout survey, taken after further cleanup and a new license submittal, concurred with the new licensee report with one significant exception.

Our review of past inspection reports and our finding on the last inspection indicate that a considerable number of radioactive waste burials have been made at this site; the location of many of these burials not identified. Attachment B of the enclosed report contains the excerpts from past inspections that highlight this situation. It is our belief that an unconditional release of this facility under these conditions would not be appropriate. We therefore recommend that prior to release, each burial be identified as to location and amount of material. In addition we recommend that appropriate licensing action be taken to insure control of these burials by the new owner.

Paul R. Nelson, Chief Radiological and Environmental Protection Branch

Enclosures:

Epstein 10/21/14

McClintock 10/21/74 7/2 Nelson 10/21/24