

ALUMINUM COMPANY OF AMERICA  
1600 HARVARD AVENUE  
CLEVELAND, OHIO 44105



January 5, 1994

Mr. John Austin, Chief  
Decommissioning and Regulatory  
Issues Branch  
Division of Low-Level Waste Management  
and Decommissioning  
Office of Nuclear Material Safety  
and Safeguards  
United States Nuclear Regulatory Commission  
Mail Stop 5E2  
11555 Rockville Pipe  
Rockville, MD 20852

Dear John:

In response to your letter dated 12/20/93 and our subsequent phone conversation concerning the thirty-two LSA boxes, please find attached a copy of the signed affidavit which we discussed. The signed affidavit has been forwarded to Chemetron's insurance carrier.

During our phone conversation, we discussed that the boxes were sealed and all clips were in place. We believe a settlement will be reached with Chemetron within approximately one month. In the mean time, we would like to limit the potential for contaminating any other areas. Therefore, we would like to leave the boxes in their present location. We will ensure that the boxes are maintained to eliminate any contamination.

If there are any questions or comments, please contact me at 216-641-4390.

Sincerely,

Daniel J. Ryan  
Environmental and Industrial Hygiene Manager

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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

CHEMETRON INVESTMENTS, INC., )  
)  
Plaintiff, )

vs. )

CIVIL ACTION NO. 90-1064

FIDELITY & CASUALTY COMPANY )  
OF NEW YORK, et al., )  
)  
Defendants. )

ALLEGHENY INTERNATIONAL )  
CANADA, LTD., )  
)  
Plaintiff, )

vs. )

CIVIL ACTION NO. 92-1274

FIDELITY & CASUALTY COMPANY )  
OF NEW YORK, et al., )  
)  
Defendants. )

AFFIDAVIT OF DANIEL J. RYAN

STATE OF OHIO )

COUNTY OF CUYAHOGA )

SS:

Daniel J. Ryan, being duly sworn and upon his oath, deposes and states as follows:

1. I am the Environmental/Industrial Hygiene Manager of the Cleveland Works of the Aluminum Company of America ("Alcoa").
2. I have personal knowledge of the facts and circumstances surrounding the matter which is the subject of this Affidavit.

3. The Cleveland Works of Alcoa is located adjacent to the facilities of McGean Roco, Inc. in Newburgh Heights, Ohio.

4. Building 65 at the Alcoa Cleveland facility has been standing in its present location from a time prior to 1965 to the present date. During that period of time, the building has had the same roof that it had until remediation work was performed on the roof in 1993 by reason of uranium contamination.

5. In the process of preparing for demolition of Building 65 at Alcoa's Cleveland facility, we discovered that the HVAC system and the rooftop were contaminated with depleted uranium in concentrations which require remediation.

6. We traced the source of the uranium to the McGean Roco, Inc. facility adjacent to the Alcoa property.

7. Attached hereto as Exhibit 1 is a true and correct copy of a proposal from our remediation contractor, Integrated Environmental Services for remediation and radiological survey of the Building 65 roof.

8. The proposal, Exhibit 1 hereto, was accepted by Alcoa and the remediation work was performed substantially in accordance with the proposal.

9. Attached hereto as Exhibit 2 is Alcoa's letter to the Nuclear Regulatory Commission dated May 5, 1993 along with analytical and field measurements taken from the roof of Building 65.

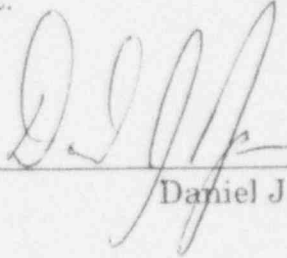
10. Exhibit 2 sets forth test results of samples taken from the roof and indicates that the radioactive substance on the roof was depleted uranium.

11. Attached hereto as Exhibit 3 is an analytical report from Sciencetech, Inc. dated July 5, 1993 containing test results with respect to the samples from the roof of Building 65.

12. Exhibit 3 sets forth further detailed test results of the roof samples indicating that the contaminant was depleted uranium.

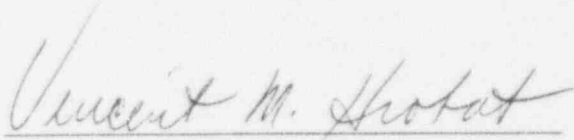
13. Attached hereto as Exhibit 4 is a true and correct copy of a summary of the costs of remediation of the uranium contamination of Building 65 of Alcoa's Cleveland Works.

Further affiant sayeth Naught.



\_\_\_\_\_  
Daniel J. Ryan

Sworn to and subscribed before me this 27<sup>th</sup> day of December, 1993.



\_\_\_\_\_  
Notary Public

**VINCENT M. HROBAT**  
NOTARY PUBLIC FOR THE STATE OF OHIO  
MY COMMISSION EXPIRES OCT. 5, 1995

EXHIBIT 1



**INTEGRATED ENVIRONMENTAL SERVICES**

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A DIVISION OF TRITEC  
66 SWALTER ROCK ROAD  
DANBURY, CT 06810  
Oid 796-5779

April 21, 1993  
Refer to: ESR-4853

Mr. Mark A. Gradert  
Senior Environmental Specialist  
Aluminum Company of America  
1600 Harvard Avenue  
Cleveland, OH 44105

Subject: Submittal of NES/IES Proposal No. 9316-108 for Remediation and  
Radiological Survey of Building 65 Roof

Dear Mr. Gradert:

NES, Inc./Integrated Environmental Services (NES/IES) is pleased to submit the enclosed proposal for the remediation of the building 65 roof.

If you have any questions concerning this proposal, you may contact me at (203) 796-5221.

Sincerely,

A handwritten signature in cursive script that reads "FR Rebmann". The signature is written in dark ink and is positioned above the typed name.

Frank Rebmann  
Section Manager  
Radiological Services



# INTEGRATED ENVIRONMENTAL SERVICES

PROPOSAL TO

ALCOA  
1600 HARVARD AVENUE  
CLEVELAND, OH 44105

FOR

REMEDICATION AND RELEASE SURVEY  
OF  
BUILDING 65 ROOF SURFACE

VERBAL REQUEST OF APRIL 20, 1993

22 APRIL 1993

INTEGRATED ENVIRONMENTAL SERVICES  
A DIVISION OF NES, INC.  
44 SHILTER ROCK ROAD  
DANBURY, CT 06810

NES/IES Proposal 9316-168

This Proposal and its contents are the sole and exclusive property of NES, Inc. and are submitted on a confidential basis solely for the purpose of enabling the recipient to evaluate the information contained herein. In accepting this proposal, the recipient agrees he is doing so solely for his evaluation and for no other purpose. It shall not be reproduced or distributed to others without the express written consent of NES, Inc. All copies of this proposal or any part thereof shall be returned immediately upon the request of NES, Inc.

A Division of NES  
44 Shilte Rock Road  
Danbury, CT 06810  
Tel No. (203) 796-5264 FAX No. (203) 792-3168



NES/IES Proposal 9316-108

Section 1.0

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SECTION 1.0  
TECHNICAL APPROACH





NES/IES Proposal 9316-108

Section 1.0

## 1.0 TECHNICAL APPROACH

Integrated Environmental Services, a division of NES, Inc. (NES/IES) is pleased to present this proposal to provide a remediation and release survey of the Alcoa Building 65 Roof Surface.

NES/IES will provide all personnel, equipment, and materials to perform the remediation and release survey of approximately 28,500 square feet of roof surface of building 65. The final outcome of this project is to provide documentation formalizing the release status of building 65 roof.

This project will be performed within the requirements of the Health and Safety Plan, Radiological Survey Plan and Work Plan for the remediation of Building 65 ventilation system.

### Scope and Approach

#### Site Preparation

A temporary chute will be constructed which will allow removed material to be moved to the ground floor of building 65. Equipment required for the roof removal process will be ordered and brought to the site.

#### Roof Covering Removal

The roof surface will be lightly misted with water. Loose stone gravel and accumulated dirt will be shoveled into wheelbarrows and transported to the preconstructed removal chute. The removed material will be dropped into the transport chute leading to a prestaged B-25 radioactive waste disposal box located at the terminus of the removal chute. The box will be staged in a temporary containment enclosure on the first floor of building 65. The enclosure will be equipped with an HEPA ventilation unit. The ventilation unit will ensure the containment is maintained under a negative pressure.

The exposed roof surface will then be sprayed with latex paint for dust control. The layers of roofing along with any fixed, gravel/tar aggregate will be stripped from its underlayment. Decontamination of basic roof



NES/IES Proposal 9316-108

Section 1.0

material (concrete structure) other than vacuuming is not part of this project. Removed roof covering will be dumped into the removal chute.

As sections of roof covering are removed, any loose material remaining on the underlying surface will be vacuumed. The area will then be prepared for the release survey.

### Radiological Release Survey

The survey will be performed to the requirements of NUREG/CR-5849; "Manual for Conducting Radiological Surveys in Support of License Termination". All survey results will be recorded on standard survey forms. Any areas not meeting the release criteria above will be remediated and resurveyed at no additional charge to ALCOA. Copies of the survey forms will be included in a formal report to be submitted by NES/IES.

### Package/Process Radioactive Waste

The estimated volume of radioactive waste generated during this project is 1,200 A<sup>3</sup>. NES/IES will package, manifest and arrange for the transport of all waste for shipment. The waste will be shipped to the Clive, Utah facility of Envirocare of Utah, Inc.

NES/IES may revoke acceptance of any non-conforming waste materials. A justified revocation of acceptance shall operate to revert risk of loss and all other incidents of possession to the Owner at the time revocation is communicated to the Owner. NES/IES shall take all reasonable steps to appropriately protect the waste materials until such time that the Owner can properly retake actual possession and take control thereof.

### Site Demobilization

The demobilization task will provide termination of the project in a logical manner. All temporary structures will be disassembled and surveyed. Temporary equipment and tools used during the project will be surveyed, packaged and shipped back to the NES/IES office in Danbury CT.



NES/IES Proposal 9316-101

Section 1.0

**Final Documentation**

Final documentation will be prepared verifying the radiological release status of building 65 roof. The final documentation effort will be performed at the NES/IES Danbury office. A copy of the final report will be provided to ALCOA within one week of site demobilization.



NES/IES Proposal 9316-108

Section 2.0

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SECTION 2.0

COST



Section 2.0

NES/IES Proposal 9316-108

**2.0 COST**

NES/IES will provide the services described in Section 1.0. Technical Approach, on a fixed price basis. The total cost of the roof remediation and release survey is \$123,759.00.

**Project Assumptions**

All personnel will work 10 hrs/day, 6 days/week.

All clean wastes and released equipment generated during the project will be disposed by ALCOA. All radioactive wastes will be shipped by ALCOA. The quoted price includes \$13,000.00 for 20, B-25 boxes. A cost of \$3,300.00 will be charged for each additional filled box. This includes labor, material and disposal box cost. A credit of \$900.00 will be given for each empty box not used. ~~\_\_\_\_\_~~

Weather conditions may require changes to the project completion date.

NES/IES will not be responsible for any remediation of recontaminated released roofing surfaces caused or suspected to have been caused by any operation on or off the ALCOA site.

The total roofing surface to be removed and surveyed is approximately 28,500 ft<sup>2</sup>.

The quoted price does not include costs for mobilization.

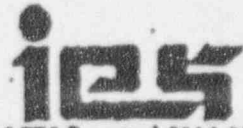
The quoted price does not include waste transportation or disposal costs.

ALCOA will provide a forklift for staging and removal of the B-25 boxes.

NES/IES will continue to use the building 65 X-ray facility as a counting area and field office provided by ALCOA at no cost to NES/IES.

**Period of Validity**

This offer is valid through June 30, 1993.



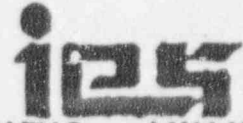
NBS/IES Proposal 9316-081

Section 3.0

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SECTION 3.0

SCHEDULE



NES/IES Proposal 9316-081

Section 3.0

### 3.0 SCHEDULE

NES/IES can begin this project as soon as the contract is awarded. Every effort will be extended to prevent remobilization. The roof remediation project, including the release survey, will take approximately 28, 10 hour work days to complete. The preparation and submittal of the final report will take approximately one week following site demobilization.

## BUILDING 65 RADIATION REMEDIATION

A.	Building 65 HVAC System	\$170,386
B.	Building 25 Tubs	\$15,969
C.	Building 65 Roof	<u>\$123,759</u>
		210,114

### TRANSPORTATION

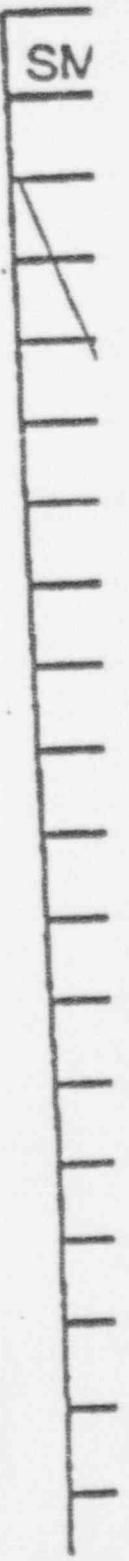
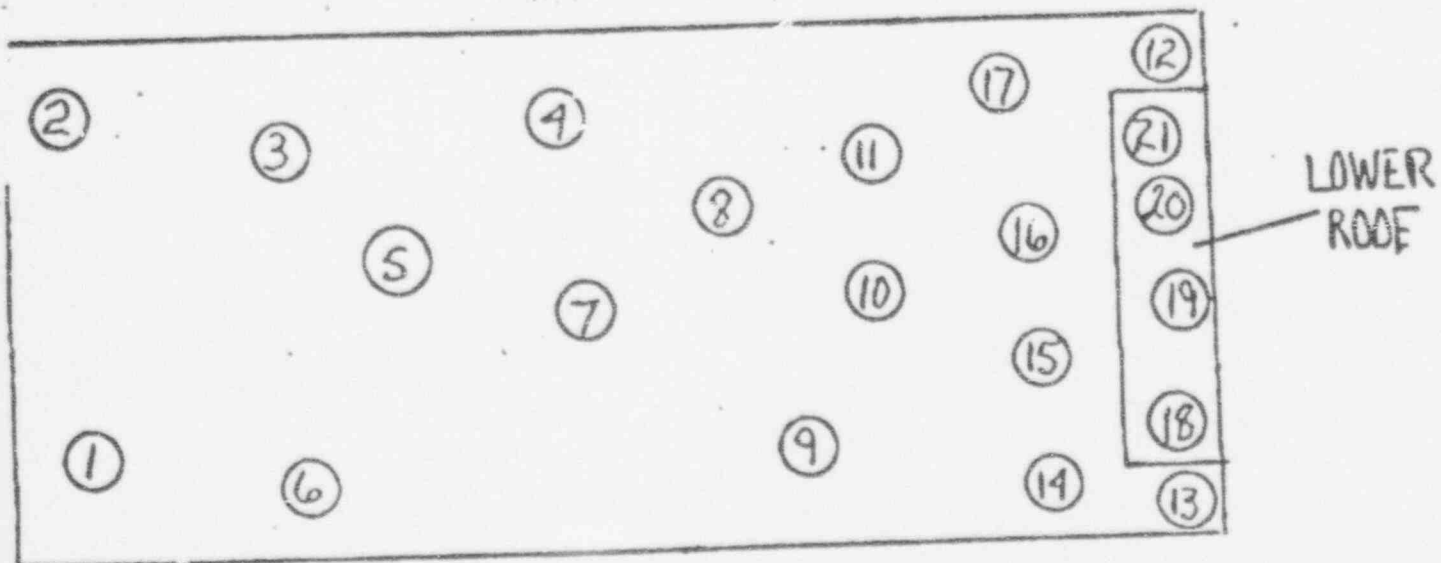
(1) NES	\$3,783/trip x 5 trips	\$18,915
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### DISPOSAL

(1) 25 LSA B-25 Boxes	\$50 per cu. ft.	\$116,250
- 93 cu. ft. per box (2,325 cu. ft.)		
		<u>\$445,279</u>



ICATION:



⊙ = DENOTES SMEAR LOCATION

NOTE: Smear results in dpm/100 cm<sup>2</sup> unless otherwise noted. (1) denotes

