



**BP CHEMICALS**

BP Chemicals Inc.  
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Lima, Ohio 45802-0628  
(419) 226-1200

VIA OVERNIGHT MAIL

February 10, 1994

Mr. Sam Nalluswami, Project Manager  
Decommissioning and Regulatory Issues Branch  
Division of Low-Level Waste Management and Decommissioning  
Office of Nuclear Materials Safety and Safeguards  
United States Nuclear Regulatory Commission  
One White Flint North  
11555 Rockville Road  
Rockville, MD 20852

Reference: License No. SUB-908  
Docket No. 040-07604

Subject: Revised Application for License Amendment  
to Authorize On-Site Disposal of Mixed Wastes

Dear Mr. Nalluswami:

BP Chemicals Inc. (BPC) herewith applies for an amendment to its NRC License No. SUB-908 for the purpose of obtaining NRC authorization for the on-site disposal of mixed low-level radioactive and RCRA hazardous wastes at its Lima, Ohio chemical manufacturing facility. This application is the second revision to an application originally submitted to NRC on August 15, 1991. The first revision was submitted on February 28, 1992 to update the application to match changes to the closure plan required at that time by Ohio EPA. The second revision is herewith submitted to incorporate information acquired as the result of Division I activities conducted in 1992 and 1993, and to make any corresponding design changes. The most significant new information and corresponding design changes are as follows:

- Increase in volume of waste necessitating the construction of three cells instead of two;
- Larger excavation of contaminated soil at V-1 pond necessitating a revision to V-1 cell design;
- Revised sludge stabilization methodology to meet Ohio EPA stabilization criteria resulting in revised pathway analysis;
- Newly measured activity levels in sludges resulting in revised pathway analysis.

As was indicated by BPC representatives during their January 24, 1994 meeting with NRC, BPC is prepared to undertake construction of the first disposal cell and placement of waste in the first cell in 1994. Our schedule can only be met if we are able to initiate construction in the spring. Receipt of an NRC license amendment authorizing on-site disposal is needed by BPC before we can initiate this work.

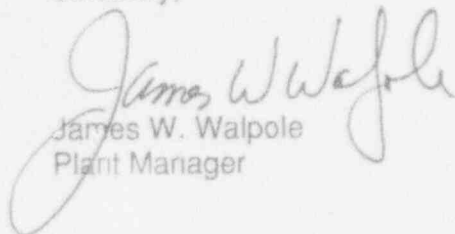
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Because the cell construction and sludge stabilization activities need to be conducted during the construction season (April through November), any significant delay in securing NRC approval could result in pushing the start of this work into 1995. Therefore, your timely review and approval of this application is greatly appreciated.

If there are any questions, please contact William Rupert by calling 419-226-1299 or give me a call at 419-226-1201.

Sincerely,

  
James W. Walpole  
Plant Manager

Enclosures

cc: K. J. Lambert, NRC Region III  
J. Steers, Ohio EPA - NWDO  
R. Meyer, Ohio EPA - CO

ksw  
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