

APR 11 1994

Mr. John M. Cigan  
Horsehead Resource Development Corporation  
4th and Franklin Ave.  
Palmerton, Pa. 18071

Dear Mr. Cigan:

Recently, the Nuclear Regulatory Commission staff has been exploring the issues associated with the management of baghouse dust from electric arc furnaces (EAF dust) that may be contaminated with radioactive material from the inadvertent melting of licensed radioactive sources. Although the known incidents in which EAF dust has become contaminated are limited, primarily because of the monitoring of scrap metal feedstock by the scrap metal recycling industry, when an incident occurs, the volume of EAF dust generated can reach 20,000 cubic feet. Treatment and disposal of this volume of contaminated dust, in accordance with the regulations governing both the radioactive and hazardous material, can be extremely difficult and costly. As we discussed during our phone conversation of April 4, 1994, I would like to visit the Horsehead Resource Development Corporation's (HRD) facility in Bartelsville, Oklahoma on May 5, 1994, to gain a better understanding of the processes by which the electric arc furnace dust residue is being managed at that facility. Michael Weber, of the NRC's Office of Nuclear Material Safety and Safeguards, and Robert Evans, of the NRC's Region IV office (Arlington, TX), will be accompanying me on this visit. We intend to use the information gained through this visit in developing a general approach for responding to contamination events involving licensed radioactive sources. In addition, at some point in the future we may also desire to visit HRD's facility in Palmerton, Pennsylvania, where the EAF dust is initially processed.

you have any questions concerning this request, please contact me at (1) 504-2566.

(Original Signed by \_\_\_\_\_)

Dominick A. Orlando, Project Manager  
Low-Level Waste and Decommissioning  
Projects Branch  
Division of Waste Management  
Office of Nuclear Material Safety  
and Safeguards

Ticket N/A

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SUBJECT ABSTRACT: REQUEST TO VISIT HRD FACILITY IN OK

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Mr. John M. Cigan  
 Horsehead Resource Development Corporation  
 4th and Franklin Avenue.  
 Palmerton, Pennsylvania 18071

Dear Mr. Cigan:

Recently, the Nuclear Regulatory Commission staff has been exploring the issues associated with the management of scrap metal that becomes contaminated with radioactive material during the recycling process, particularly the management of contaminated baghouse dust from electric arc furnaces (EAF dust). The Environmental Protection Agency has classified EAF dust as a hazardous waste (K061). As such, radiologically contaminated EAF dust is considered mixed waste. Although the known incidents in which EAF dust has become contaminated are limited, primarily because of the monitoring of scrap metal feedstock by the scrap metal recycling industry, when an incident occurs, the volume of EAF dust generated can reach 20,000 cubic feet. This volume of mixed waste can be extremely difficult and costly to treat or dispose, particularly for an industry not familiar with radioactive materials or the issues associated with their safe management.

In response to your request during our phone conversation of April 4, 1994, I am requesting permission for NRC staff to visit the Horsehead Resource Development Corporation's (HRD) facility in Bartelsville, Oklahoma. Our purpose in visiting HRD's Bartelsville facility is to gain a better understanding of the processes by which the electric arc furnace dust residue is being managed at that facility and to discuss HRD's procedures in the event radioactive material is inadvertently introduced into your K061 waste process from radioactive material in the scrap metal. Mike Weber, of the NRC's Office of Nuclear Material Safety and Safeguards, and Robert Evans, of the NRC's Region IV office (Arlington, TX), will be accompanying me on this visit. If you have any questions concerning this request, please contact me at (301) 504-2566.

Dominick A. Orlando, Project Manager  
 Low-Level Waste and Decommissioning  
 Projects Branch  
 Division of Waste Management  
 Office of Nuclear Material Safety  
 and Safeguards

Ticket N/A

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OFC :	LLDP	e	LLDP	<i>[Handwritten initials]</i>					
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DATE:	4/7/94	H	4/7/94	H					

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