

CINTICHEM, INC.
P.O. BOX 815
TUXEDO, NEW YORK 10987 (914) 351-2131

April 14, 1994

Ms. Elaine Carlin, Executive Director
Northwest Interstate Compact on
Low Level Radioactive Waste Management
P. O. Box 47600
Olympia, WA 98504-7600

Dear Ms. Carlin:

SUBJECT: Cintichem, Inc. Petition of July 1993 To Use The
Envirocare Repository

I would again like to thank the Commission for allowing us to explain the importance of the Envirocare facility to enable the efficient decommissioning of the Cintichem facilities. As I explained during the last Compact Commission meeting, the current NRC decommissioning acceptance criteria for structures and soil are very conservative and consequently require the removal of substantial volumes of slightly contaminated soil and rubble to release facilities for unlicensed operations. Since our project is at the stage where most of this type of waste is being generated we had hoped to receive a favorable decision on our petition by now.

I am writing this letter to re-emphasize the importance of the Envirocare repository to the Cintichem decommissioning project which could also apply to other similar decommissioning projects. The current NRC criteria for releasing a facility from licensing restrictions at the end of decommissioning is based on a primary goal of limiting the exposure to future residents on the site to a few mRem/yr above background, provided the achievement of this goal is in accordance with the ALARA concept. The easiest and most efficient way of achieving this goal is to have access to a repository at a reasonable cost. Without this, each task of a decommissioning project must be evaluated as follows:

- o determine the cost of removing and disposing of materials in bulk and,
- o evaluate the feasibility and cost of segregating clean from contaminated material and,
- o evaluate the cost of decontaminating materials or structures and,

JJM/34.94B

9404250126 940414
PDR ADOCK 05000054
W PDR

NH10/0

Ms. Elaine Carlin, Executive Director
Northwest Interstate Compact
April 14, 1994
Page 2

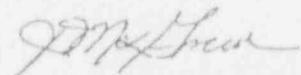
- o perform an ALARA analysis to determine the justification for higher exposure goals from residual materials.

The relative costs of these various possible options are then factored into the decision on how each task is performed. As the disposal cost of bulk material rises the more costly and more time-consuming alternatives become more attractive and feasible. To date, Cintichem has preferred the first three options and we have not yet resorted to the latter ALARA evaluations, however, it is readily apparent that, at the currently available cost of disposal, the incremental cost of changing projected exposures to the public by one (1) person-Rem/yr is in the order of tens of millions of dollars in decommissioning cost. Furthermore, any change to release criteria under an ALARA justification would require regulatory (NRC) approval. This would be a very time-consuming process.

The Cintichem decommissioning project is currently encumbered by such cost/benefit rationalizations. Consequently, the costs are higher, the project schedule is extended and worker exposures are higher. Access to the relatively lower cost Envirocare facility would remove these encumbrances. Disposal of the high volume - low concentration decommissioning rubble and soil in repositories such as that of Envirocare would also leave more room in the more secure low level waste repositories for wastes in the higher hazard classifications. There would be a net benefit to all parties concerned as well as the general public.

In conclusion, we need to have a favorable decision on our petition as soon as possible in order for the remainder of the Cintichem project to be completed as efficiently and as safely as possible and perhaps to be completed as planned, - i.e. released for future unrestricted productive use.

Very truly yours,


J. J. McGovern
President/Plant Manager

JJMcG/bjc

cc: Glenn J. Miller - Alaska
Steve Oberg - Idaho
David Stewart-Smith - Oregon
Dru Butler - Washington
James Ikeda - Hawaii
Adrian C. Howe - Montana
William Sinclair - Utah
Dave Finley - Wyoming
Al Rafati - Envirocare of Utah, Inc.

JJM/34.94B