

EXXON RESEARCH AND ENGINEERING COMPANY

HEALTH SERVICES DIVISION

Clinton Township, Route 22 East, Annandale, New Jersey 08801-0996

ROBERT E. DALE, CIH
Industrial Hygiene and
Environmental Health

Telephone (908) 730-3053

CERTIFIED MAIL RECEIPT REQUESTED

April 5, 1993

Division of Radiation Safety and Safeguards
Nuclear Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, Pennsylvania 19406-1415

Re: NOV Response Follow-up

NRC License No. 29-05260-13
Routine Inspection No. 93-001
Docket No. 030-05310

ATTENTION: Mr. Francis M. Costello
Chief Industrial Applications Section

93RAPCL26

Dear Mr. Costello:

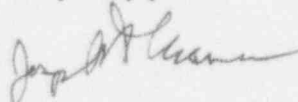
During a telephone conversation last week with Mr. R. Gibson, Exxon Research & Engineering Company was informed that the NRC had received our initial response to the NOV. At that time Mr. Gibson also indicated that the Commission would like to review the RIC business that was conducted during additional meetings held in 1992.

ER&E's initial response indicated that at least four business meetings were held in addition to the two recorded formal RIC meetings. These meetings concerned issues regarding the generation and storage of low-level radioactive waste and mixed waste, and the transfer of radioactive reagents from the Linden site and the eventual decommissioning of the Linden Building 19 storage room. These were the major program issues for the RIC in 1992. Notes and minutes which were taken during the January 27, 1992 and May 8, 1992 meetings are enclosed. Although we are unable to provide documentation for the February 20, 1992, June 22, 1992, and December 7, 1992 meetings, we can provide certification from meeting attendees regarding topics of discussion, if necessary.

I feel that our efforts to comply with new State and Federal regulations governing the use and storage of radioactive materials were done with the utmost attention to personal safety.

If you have any further questions, please call me at (908) 730-2739.

Very truly yours,



Joseph A. Mancuso
RIC Secretary

Enclosures

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Mixed Waste Meeting
January 27, 1992
Clinton

Present: Steve Hinton, Joe Mancuso, Steve Swift, Ed Hojnacki, Vince Dee, Robert Dale,
Jessica Nacheman and Don Paris

Next Meeting: February 20, 1992 in Clinton

Three Sites - FP, CL, LTC - and EBSI

- Talk with NRC - Re: Issues
- Send Copy of EPA Booklet to All

Inventory

- What currently exists at each site

Mixed Waste - Radioactive waste and hazard waste component

- If listed - it remains hazard waste
- If characteristics then can be considered non-hazard waste if characteristics disappears

Clinton Contacts - Steve Hinton and Vince Dee

- + Old Stuff to assess usefulness
 - Five items in receiving area - minimal material/PC-189
 - Reagents
 - Old uranium salts
 - Valdez ¹⁴C tracers tagged material
 - Scintillation vials containing - oil, H₂O and radioactive material

Major use today is P32 or P33 - small drums of waste containing glass, rags, and gloves

- These drums - tested for radioactivity - kept in PC-189
- Satellite accumulation rule if also hazard waste
- Include as part of RIC/Environmental Advisor (e.g. Vince Dee)
- Pre-planning to keep reagents and hazardous material separate
- Site remediation for Exxon sites (many)
- John Wilkenson - Section Head in FP
- Use ¹⁴C hydrocarbons to test soils - plan to set-up test at Clinton site
- Tracers - must be used for these tests.

Waste produced - sludge (hydrocarbon radioactive), aqueous oily radioactive mixture, gas,

Radiotracer - important analytical tool

Steve Hinton to identify streams produced by research efforts using radiotracers

FP - No Radioisotopes

- Only instruments, sealed sources
- Future uses: Covered by forms - survey forms sent out by RIC (Steve Hinton)

EBSI

- Joe Mancuso discussed future radioactive issues with Bill Kocis and Eric Vath

Linden - PRD/ASL - Steve Swift

- Preparing summary report
- Steve Hinton will discuss future usage of isotope with Frank McElroy
- Steve Swift to set-up meeting with Frank McElroy and Vince Dee
- Ed Hojnacki will be contacted

Steve Swift explained nature of work being done at ER&E/ASL at LTC

- Hydrocarbon (PNAs) labeled with ^{14}C used for PRD work

Bldg 19 Stuff - designate someone as leader to organize inventory. Will discuss future actions at next meeting

TO	Meeting Attendees	REFERENCE	92RAPCL21	DATE	May 11, 1992
		FROM	SUBJECT		
	R. E. Dale <i>Rob</i>	LTC Building 19 Radioisotope Storage Room Decommissioning Project Meeting of May 8, 1992			

Meeting Attendees

J. Dev	J. A. Mancuso	S. T. Swift
W. K. Robbins	J. G. Hedin	V. T. Dee
L. E. Furlong	E. J. Hojnacki	R. E. Dale

A meeting was held on May 8, 1992 to finalize the action plan for the decommissioning of the radioisotope storage room in LTC Building 19. A draft action plan flow chart (attached) was reviewed and the status of several initiated action steps was reported. The following summarizes the status of these items:

1. Win Robbins has contacted the original suppliers of the radioactive reagents. None of the suppliers want to take back the reagent materials.
2. Win Robbins has contacted a radioactive reagent broker who has expressed some interest in accepting the reagents. Although Win will continue to pursue this, he is not optimistic that the broker will actually accept any of the reagent materials.
3. The Chemicals task group lead by Irwin Gardner is finalizing a plan for transferring the radioactive ethylene and propylene gases from their current cylinders into cylinders that will meet DOT shipping requirements.
4. Vince Dee has identified two potential waste disposal companies, NSSI in Houston, TX and DSSI in Kingston, TN, who may be able to dispose of mixed waste before the end of 1992.
5. Neither Teledyne nor AETC can transport mixed waste by themselves, since neither has both an NRC and RCRA license for transporting waste. Teledyne is currently stipulated as our radioactive waste transporter in the ER&E NRC License.
6. Teledyne can transfer radioactive reagents from Linden to Clinton under their NRC license. Cost for the transfer should be no more than about \$1000.
7. A proposal has been received from Teledyne for the cleanup of the Building 19 radioisotope storage room and subsequent disposal of any low-level radioactive waste (LLRW) that is generated during the cleanup. The cleanup operation will use non-hazardous cleaning agents and will not generate any mixed waste. The estimated cost of the complete procedure is \$6-10K.

The following action items were assigned:

1. Complete the transfer of the radioactive gases into cylinders that meet DOT specifications as soon as possible.
Responsibility: Irwin Gardner Task Group
2. By June 1 determine if DSSI can acceptably dispose of mixed waste and by June 15 determine if NSSI can acceptably dispose of mixed waste.
Responsibility: V. T. Dee
3. Contact NRC by May 15 (in writing) to request permission to use alternative LLRW transporter.
Responsibility: J. A. Mancuso
4. Identify mixed waste transporter alternatives by June 1.
Responsibility: V. T. Dee/J. A. Mancuso
5. Set up a job number to track out of pocket project costs (travel, contractor charges, regulatory fees, etc.).
Responsibility: R.E. Dale
A job number was established by HSD/IH on May 11, 1992. Out of pocket project costs will be charged against: DivSec - C4830, Job No. - Q00332. Following completion of the project, the Compliance Steering Group, in conjunction with Corporate Research and Exxon Chemicals, will determine how these costs will be apportioned and backcharged to the responsible parties involved in the project.
6. Report to meeting attendees on action item progress/status by June 19.
Responsibility: R. E. Dale

R. E. Dale also will keep meeting attendees informed of any significant events or bottlenecks that occur in the interim period prior to June 19. On June 19, a progress report on the permit application procedures for Clinton will also be provided.

Any radioactive reagents that are still on hand in Linden will be shipped to Clinton for continued storage no later than July 1, 1992. Cleanup of the Building 19 storage room will begin no later than July 15. The decommissioning project is scheduled for completion no later than September 15, 1992.

RED:barn

cc: J. Bernstein

C. M. Yarborough, M.D.