



**BP CHEMICALS**

BP Chemicals Inc.  
Fl. Amanda Road  
P.O. Box 628  
Lima, Ohio 45802-0628  
(419) 226-1200

VIA OVERNIGHT MAIL

Mr. Sam Nalluswami, Project Manager (T7F27)  
Low-Level Waste and Decommissioning Projects Branch  
Division of Waste Management  
Office of Nuclear Materials and Safeguards  
United States Nuclear Regulatory Commission  
One White Flint North  
11555 Rockville Road  
Rockville, MD 20852

June 6, 1994

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

Subject: Supplemental Information in Support of  
License Amendment Application for On-Site Disposal of  
Pond Closure Mixed Waste

Dear Mr. Nalluswami:

On May 25, 1994, BP Chemicals submitted a response to comments received from NRC during the March 31 and April 1 meetings which were held to review the BP Chemicals license amendment application for onsite disposal of low-level mixed waste. Subsequently, additional information was requested by NRC via telephone. This letter will serve as a transmittal for the requested information as specified below:

- One additional copy of the three volume response submitted on May 25, 1994;
- One computer diskette containing the input data for the RESRAD run referenced in Appendix B of the May 25, 1994 submittal;
- Four copies of Figure 1 - Catalyst Plant Sump Systems missing from the *Catalyst Plant Operating Manual* which was submitted as a part of Exhibit E of the May 25, 1994 submittal. This figure should be installed in the manual immediately after Page 245 of the text. X

A computer printout of the RESRAD run referenced in Appendix B of the May 25, 1994 submittal is being forwarded to the NRC directly from our consultant, Dames & Moore.

One additional item for which BP Chemicals still owes NRC a response is Item 5 of the list of comments. To address this comment, BP Chemicals and its contractors are currently in the process of modifying *Appendix E - Project Quality Assurance and Quality Control Plan* of the license amendment application to include a new procedure for measuring activity level of each batch of stabilized sludge as it is placed in the disposal cell. This new procedure will cover radiological sampling and analysis of the stabilized sludge to determine the average and maximum activities for the purpose of demonstrating compliance with Option 2 disposal criteria. The new procedure will be submitted upon completion and under separate cover.

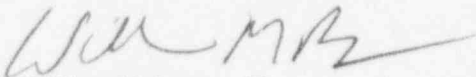
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As we indicated during our meetings, BP Chemicals continues to be concerned about the timing of NRC approval of the license amendment application. We are interested in making the best use possible of the remainder of the 1994 construction season which has already begun and which will continue through the end of November. Without NRC approval by early July, it is unlikely that BP Chemicals will be able to start construction of the V-1 disposal cell this year. We appreciated the prompt approval of the V-1 pond release report and hope that the NRC can continue to dedicate the resources needed to complete review and processing of our license amendment application in a timely fashion.

If you have any questions regarding the enclosed information, please give me a call as soon as possible at (419) 226-1299.

Sincerely,



William M. Rupert, PE  
Technical Specialist - Environmental

WMR/wmr

cc: Ken Lambert, USNRC Region III  
Robert Owen, Ohio Department of Health  
Jim Ottarson, Ohio EPA, NWDO

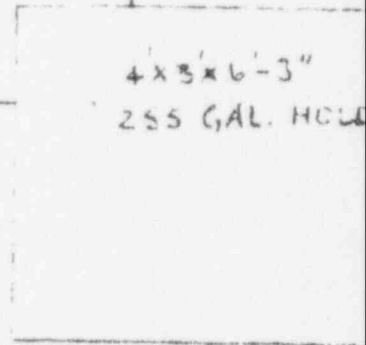
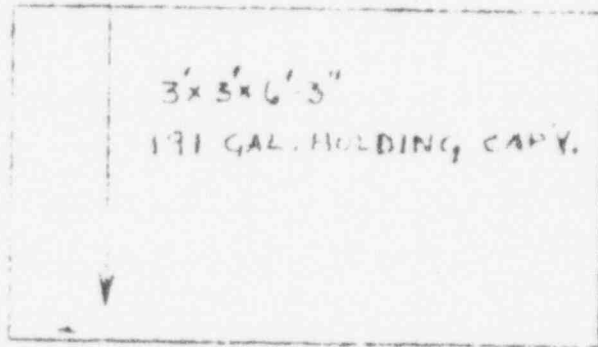
NEUTRALIZING SUMP

CHEMICAL SU

ACID PUMP DRAIN  
ACID TANK DRAIN  
AMMONIA PUMP DRAIN  
AMMONIA TANK DRAIN

AMMONIUM A  
AMMONIUM A

SEAL POT

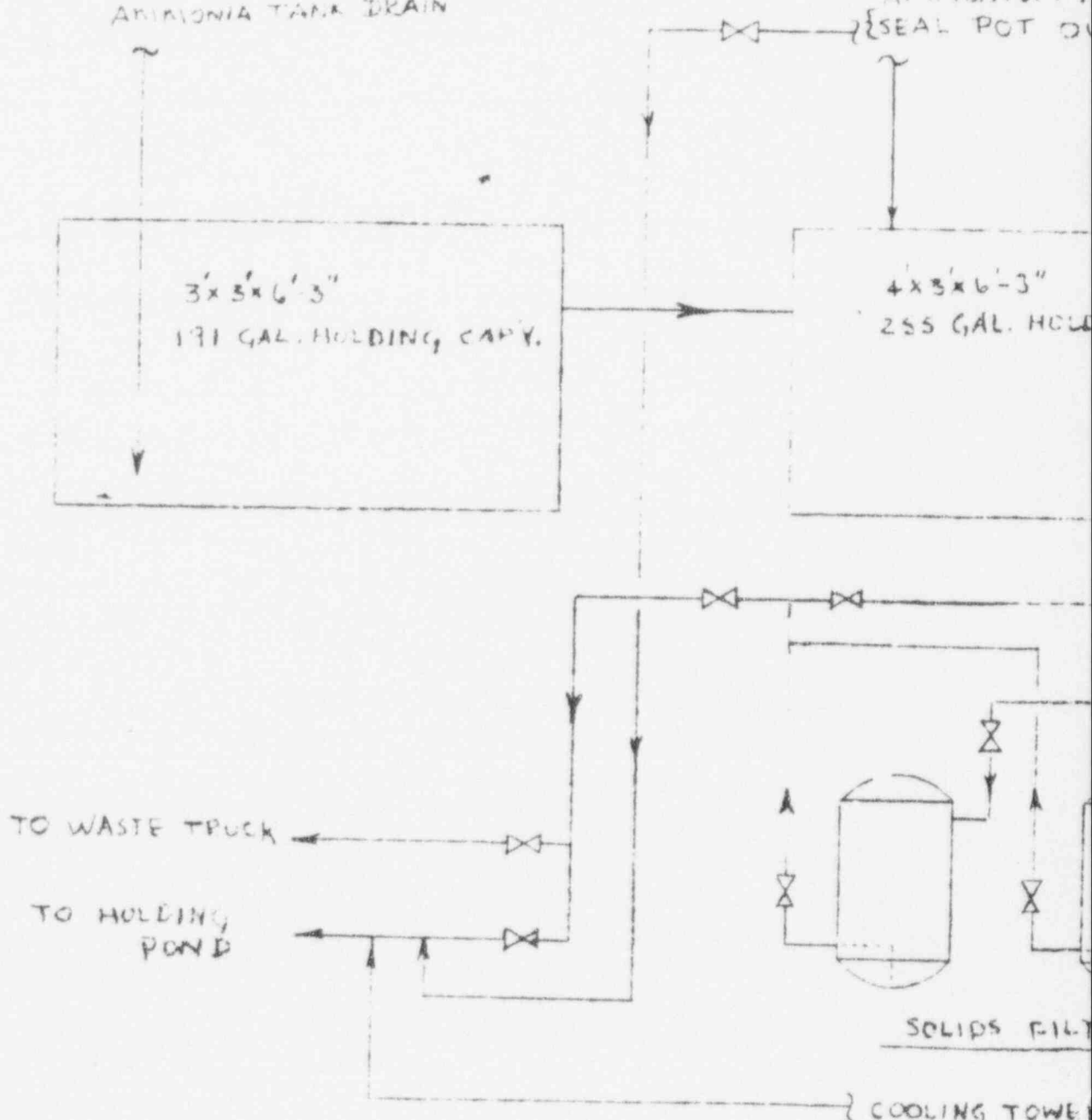


TO WASTE TRUCK

TO HOLDING  
POND

SOLIDS FILT

COOLING TOWER



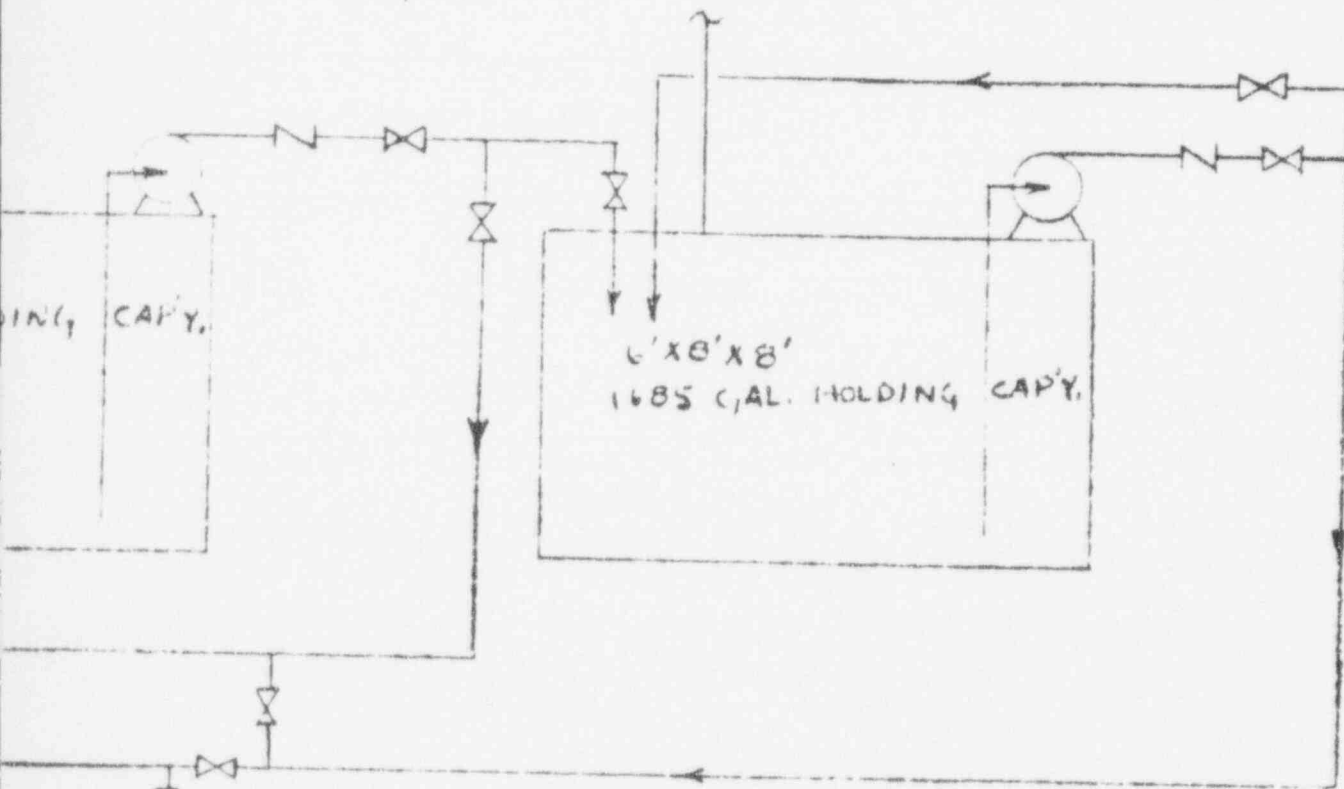
ANSTEC  
APERTURE  
CARD

Also Available on  
Aperture Card

PROCESS SUMP

NITRATE TANK DRAINS  
NITRATE PUMP DRAINS  
OUTLET EVAPORATOR, 8GPM

SILICA SOL PUMP DRAIN  
SILICA SOL TANK DRAIN  
FILTER PUMP DRAIN  
SCRUBBER CIRCULATION PUMP DRAIN  
VACUUM PUMP-SEAL WATER, 8GPM



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(1) USED IN OTHER SERVICE

|                                    |               |                 |               |
|------------------------------------|---------------|-----------------|---------------|
| <b>THE STANDARD OIL CO. (OHIO)</b> |               |                 |               |
| REFINERY ENGINEERING               |               |                 |               |
| MIDLAND BUILDING                   |               | CLEVELAND, OHIO |               |
| <b>FIG. 1 - CATALYST PLANT</b>     |               |                 |               |
| <b>SUMP SYSTEMS</b>                |               |                 |               |
| DRAWN LRF                          | DATE 11/11/66 | CHECKED         | DATE 11/14/66 |
| WORK                               |               | DWG. C-21-01    | REV. 0        |
| SCALE NONE                         |               |                 |               |

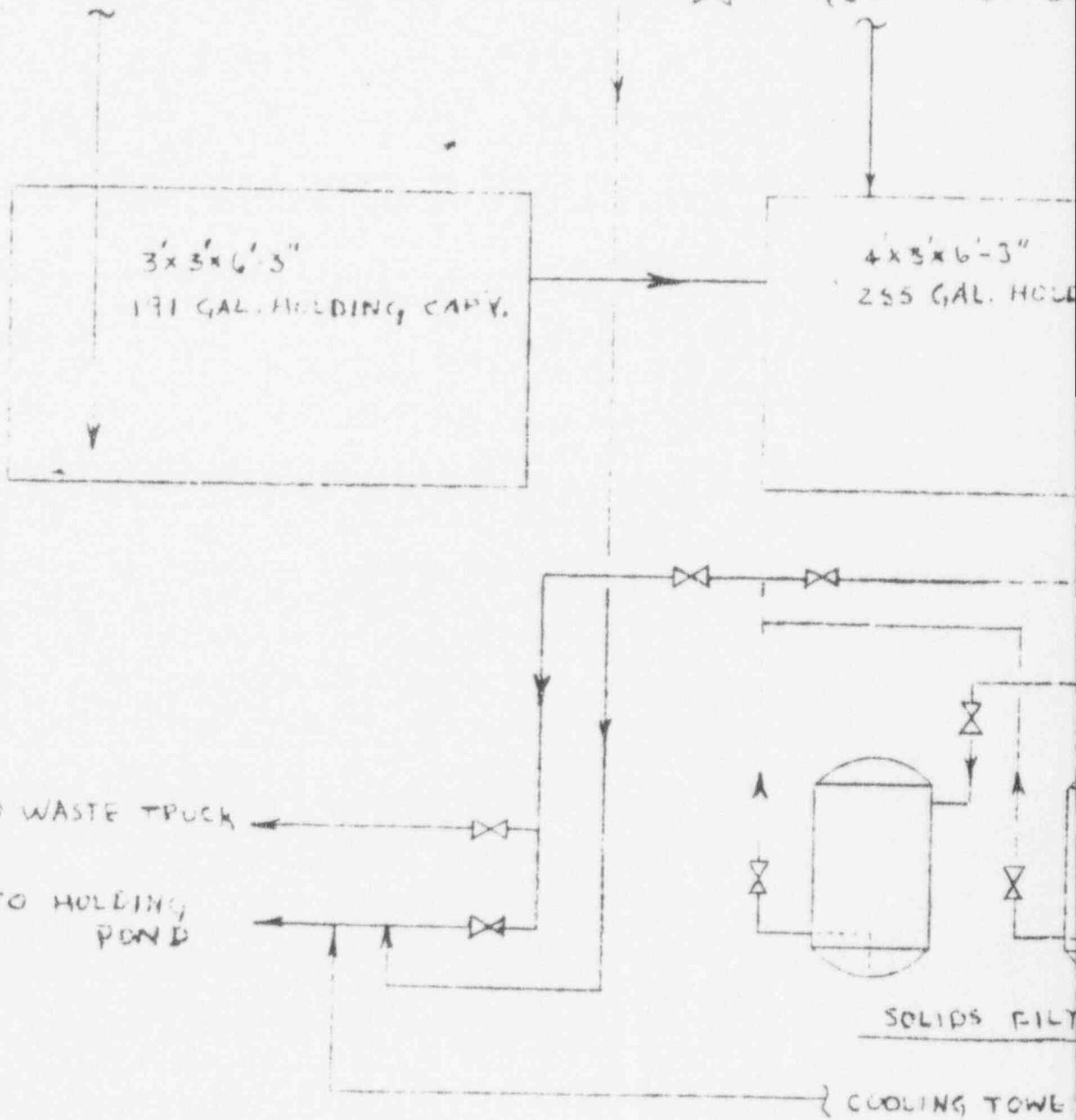
NEUTRALIZING JUMP

CHEMICAL SU

ACID PUMP DRAIN  
ACID TANK DRAIN  
AMMONIA PUMP DRAIN  
AMMONIA TANK DRAIN

AMMONIUM  
AMMONIUM

SEAL POT



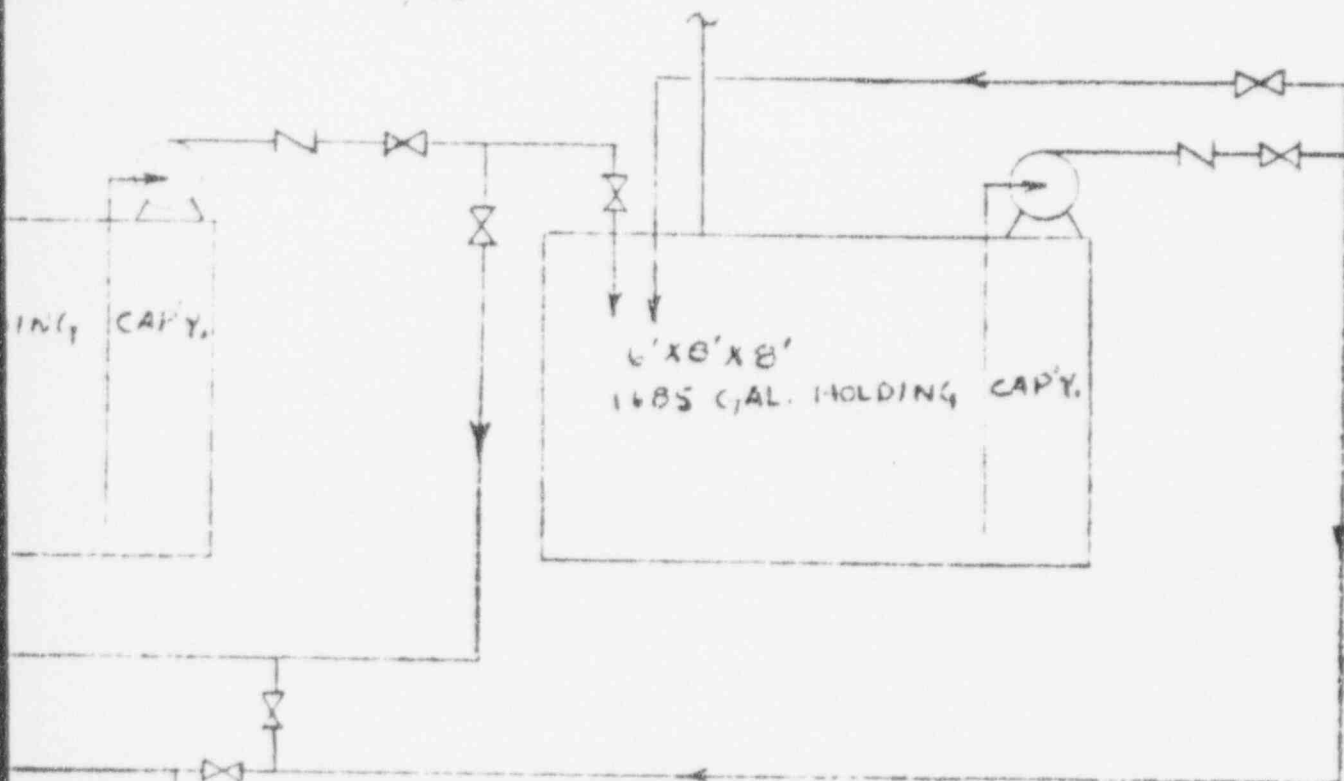
PROCESS SUMP

ANSTEC  
APERTURE  
CARD

Also Available on  
Aperture Card

- SILICA SOL PUMP DRAIN
- SILICA SOL TANK DRAIN
- FILTER PUMP DRAIN
- SCRUBBER CIRCULATION PUMP DRAIN
- VACUUM PUMP - SEAL WATER, 5GPM

- NITRATE TANK DRAINS
- NITRATE PUMP DRAINS
- OUTLET EVAPORATOR, 8GPM



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(1) USED IN OTHER SERVICE

THE STANDARD OIL CO. (OHIO)

REFINERY ENGINEERING

MIDLAND BUILDING CLEVELAND, OHIO

FIG. 1 - CATALYST PLANT

SUMP SYSTEMS

DRAWN L R H DATE 11/13/44 CHECKED DATE 11/14/44

WORK DWG. C-21-01 REV. 0

SCALE NONE