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26 May 1994

Mr. Chad J. Glenn, Project Manager
United States Nuclear Regulatory
Commission
Decommissioning and Regulatory
Issues Branch
Division of Low-Level Waste Management
and Decommissioning
Office of Nuclear Material Safety
and Safeguards
Washington D. C. 20005-0001

Excavating Fill to Locate
Buried Forced Main Sewer Line

Dear Mr. Glenn:

Following up our 20 May telephone conversation I have enclosed a copy of the Health and Safety Plan. Workers involved in our request to excavate fill so that the forced main sewer line can be located in the area south of Caldwell Avenue will be given the necessary radiation safety training and will be indoctrinated in all elements of the HASP. The HASP was prepared for us by Enserch Environmental Corp. with assistance from Dr. M. E. Wrenn, President of Radiation Surveillance Associates, Inc.

I will provide the radiation training and Ms. Jayanti Chatterjee, an Enserch Health and Safety Officer, will conduct the HASP indoctrination. She will also conduct alpha monitoring of all workers and equipment while excavation activities are in progress. Finally, all workers will be documented that they have received their necessary OSHA 40 hour training.

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Briefly, we simply wish to reduce the number of boreholes that will be converted into piezometers in the area at the facility that is being drilled in the high density pattern (Unit 1 in the SCP). Unit 3, the paved area at the facility and where buildings are located, will have all boreholes converted into piezometers due to the large spacing of boreholes in the area. The number of piezometers installed in Unit 2, the area south of Caldwell Avenue will remain unchanged.

Our consultant does not believe that the hydraulic conductivity of the fill zone can be adequately characterized by conducting pump tests on trenches constructed in the fill zone. Instead, they wish to construct 3 ft. diameter wells in this area. Also, the number of wells would be reduced from four to two because of the small area involved and because of the daily truck traffic in the area. This task is also described in section 4.6.10 subpart 3 on page 49 of the SCP.

The last modification we wish to propose involves the method by which the infiltration tests will be conducted. This task is described in section 4.6.10 subpart 9 on page 58 of the SCP. The consultant prefers to use the recognized ASTM method to conduct these tests rather than the measuring the subsidence of shallow surface pools as described in the SCP.

Since our site investigation activities are well under way we would greatly appreciate your prompt attention and response to these proposed modifications to the SCP. We believe that the proposed modifications to the SCP will enhance the quality of data we will obtain and allow us to better manage the site characterization study. Also, we would like to begin construction of the large diameter wells within the next ten days. If you have any questions regarding these proposed changes please contact me at your earliest convenience.

Sincerely,

George W. Dawes

George W. Dawes

GWD/jez

encl.

xc: B. K. Dankmyer
T. P. Mulloy
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file