

PDR-016



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

OCT 22 1985

Messrs. Richard Condit and Stephen Kohn
Government Accountability Project
1555 Connecticut Avenue, NW, Suite 202
Washington, DC 20036

IN RESPONSE REFER
TO FOIA-85-A-34
(85-483)

Dear Messrs. Condit and Kohn:

This is in partial response to your undated letter, which was received by this office on August 27, 1985, in which you appealed the NRC's response to FOIA-85-483 on the basis that it was incomplete. In your request FOIA-85-483, you requested all records compiled by the AEC and/or the NRC on the waste disposal practices of the Dow Chemical Company of Midland, Michigan, and on waste disposal policy, guidelines, studies and/or practices since 1950.

Upon further search for records related to waste disposal practices of the Dow Chemical Company, the NRC staff identified the documents listed at numbers one through 16 on the enclosed Appendix A and the seven documents listed on enclosed Appendix B. The records on Appendix A are being placed in the NRC Public Document Room (PDR) in PDR folder FOIA-85-A-34 (85-483) under your name; the records on Appendix B were previously made publicly available at the PDR. Other documents subject to this portion of your appeal are still undergoing review by NRC staff.

As was explained in the telephone conversation of September 20 between you and Linda Robinson and Betty Wagman, the NRC's guidelines and policies concerning waste disposal are delineated in 10 CFR Part 20. Specific guidelines are to be found in the docket files for each installation. As agreed, we are placing copies of some records that pertain to NRC's regulations (records 17 through 21 of Appendix A) in the PDR. With regard to these records, the staff informs me that most of these are out of date, but that the incineration guidelines in record 21 are still in effect.

We will notify you upon completion of review of the additional records mentioned above.

Sincerely,

A handwritten signature in dark ink, appearing to read "J. M. Felton", written over a horizontal line.

J. M. Felton, Director
Division of Rules and Records
Office of Administration

Enclosures: As stated

8511200039 851022
PDR FOIA
CONDIT85-A-34 PDR

APPENDIX A

FOIA 85-483

Records filed in PDR folder FOIA-85-A-34 (85-483)

1. 6/1/67 Amendment 8 to license 21-00265-06 (1 page)
2. 10/16/68 Form AEC-591-inspection 10/7-8/68 (1 page)
3. 8/21/74 Form AEC-591-inspection 8/21-22/74 (33 pages)
4. 9/26/73 Amendment 23 to license 21-00265-06 (1 page)
5. 6/28/79 Letter to Guinn from Parsons to amend license (1 page)
6. 5/1/80 Amendment 37 to license 21-00265-06 (1 page)
7. 7/31/80 Letter to Douglas from Bickel with response to Bulletin #79-19 (3 pages)
8. 10/29/80 Letter to Keppler from Rampy to amend license (4 pages)
9. 3/9/81 Telephone deficiency call to applicant by Mallett (1 page)
10. 4/13/81 Letter to Cooper from Parsons with 3 letters of opinion (24 pages)
11. 1/5/82 Letter to Mallett from Wilson requesting opinion on the State of Michigan issuing a permit for incineration of low-level radioactive waste. (1 page)
12. 4/26/84 Letter to Wilson from Axelson on the status of license 21-00265-06 (6 pages)
13. 6/26/84 Letter to Sereniawski from Wilson requesting an investigation (3 pages)
14. 7/7/84 Letter to McCann from Wilson regarding information on Dow incinerator inspection(1 page)
15. 11/28/84 Letter Lickus to Bruchmann regarding disposal methods (7 pages)
16. 09/20/83 Letter to Olson, Dow, from Bruchmann regarding review of the Dow plan for evaluating the thorium concentration in the 159' by 300' area at the Dow site. (2 pages)
17. Undated Appendix I - Guideline for Incineration of Liquid Scintillation Waste
18. 06/25/80 Letter from V. Miller "To All Medical and Academic Licensees"
19. 06/04/81 Letter from V. Miller "To All Medical Licensees"
20. 10/28/81 Letter from V. Miller "TO All Medical, Academic, and Industrial Research Licensees"
21. 06/13/84 Incineration Guidelines for Material licensees

IN THE
PDR

APPENDIX B

FOIA 85-483

- | | | | |
|----|----------|--|----------------|
| 1. | 2/7/66 | Letter Hageman to Dow | PDR 8310110070 |
| 2. | 6/8/70 | Form AEC-592- | PDR 8310110115 |
| 3. | 6/22/70 | Letter Grier to Dow | PDR 8310110130 |
| 4. | 10/20/76 | Letter Allan to Dow | PDR 8310110139 |
| 5. | 10/31/84 | Letter to Lickus from Bruchmann | PDR 8506050379 |
| 6. | 7/26/85 | Letter Shafer to Dow | PDR 8508120331 |
| 7. | 1985 | NUREG/CR-3865 BNL-NUREG-51792
(See pages 173-174) | |