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UNITED STATES
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD PANEL
WASHINGTON, D.C. 20555

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October 18, 1988

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Bernard M. Bordenick, Esq.
Office of the General Counsel
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

In the Matters of
ALL CHEMICAL ISOTOPE ENRICHMENT, INC.
(AlChemIE Facility-1 CPDF)
Docket No. 50-603-CP/OL; ASLBP No. 88-570-01-CP/OL

and

ALL CHEMICAL ISOTOPE ENRICHMENT, INC.
(AlChemIE Facility-2 Oliver Springs)
Docket No. 50-604-CP ASLBP No. 88-571-01-CP

Dear Mr. Bordenick:

The Board is conducting reviews of the NRC Staff's Environmental Assessments submitted on September 14, 1988, for the captioned proceedings that are uncontested. As charged by the Commission the reviews are being conducted in order to determine the adequacy of the NEPA assessments made by the Staff.

The Board has concluded that it needs additional information to complete its reviews. We are making a request for information at this time, in advance of any hearing, in order to save time. To wait and make these inquiries at a hearing would only delay the proceedings.

The information requested is as follows:

With Respect to Facility-1

1. (Page 2, line 26) Why has the Staff not requested more explicit information on feed material and processing rate so that it can perform an analysis of material releases that will be applicable to AlChemIE's Facility-1? What did Staff base its analysis on and why is it deemed "conservative"?
2. (Page 7, line 27) When will the design of the portable feed carts become available? Since the most serious accident that could occur involves the release of the toxic contents of a cylinder, would it not

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be important that the carts definitely (as opposed to "may") provide secondary confinement for the feed cylinders?

3. (Page 8, line 5) The same questions apply to the portable withdrawal carts as those raised with regard to the feed carts in question 2. In addition, how will the dry ice in isopropyl alcohol or liquid nitrogen system used for condensation be designed and work?
4. (Page 9, line 2) When will AlChemIE decide on the method of gas treatment (cold trapping, chemical trapping, or mechanical trapping) to be used, or will the method used be selected specifically on the basis of the physical and chemical properties of the material being processed? What environmental effects would result from the different treatments?
5. (Page 9, line 11) When will procedures be developed from data supplied by the manufacturers of feed materials for the handling, operating, and safety procedures to protect workers and the environment? Will Staff review the data supplied by the manufacturers and provide an opinion as to its adequacy?
6. (Page 11, line 20) The same question raised with respect to dry ice and isopropyl alcohol and liquid nitrogen under question 3 applies here.
7. (Page 13, line 5) Why has AlChemIE not attempted to estimate the gaseous discharges expected from the building ventilation system and the evacuation and purge systems for the cascade? Shouldn't they be required to do so in order that Staff's assessment be premised on more than mere belief?
8. (Page 18, line 24 and continuing on p. 19 through line 8) What might the effect of AlChemIE's Facility-1 be on the ecology of the endangered species, Cimicifuga rubifolia and Lampsilis orbiculata, and on other species in the Clinch River or elsewhere in the vicinity of the facility?
9. (Page 23, line 19) What is the status of AlChemIE's application for an air permit from the TDHE? Has AlChemIE satisfied the requirements of TDHE for a license?
10. (Page 24, line 9) Since the air emissions from the AlChemIE Facility-1 may be higher than those from gas centrifuge plants used by Staff to make its estimates, AlChemIE and/or the Staff should attempt to estimate the emissions to be expected from Facility-1.
11. (Page 27, line 3) If an accident releasing dimethylcadmium from a cylinder in the room containing the centrifuges should occur producing a concentration at the lower levels of the room that was substantially greater than the ACGIH TWA-TLA, it would be hazardous for the workers in the room. Have emergency plans for actions to protect the workers been

developed, and if so, what are they? If they have not been developed, they should be before the facility goes into operation.

12. (Page 27, line 20) The question about emergency plans given an accidental release of dimethylcadmium is also applicable an accidental release of tin hydride. 13. (Page 29, line 10) The probability and consequences of an accident resulting from the transportation of gas cylinders appears not to have been considered but should be.

With Respect to Facility-2

To the extent that the questions raised with respect to Facility-1 are applicable to Facility-2, they should also be answered with regard to Facility-2. In addition, we have several different questions about Facility-2 which are listed below.

1. (Page 6, line 8) Why is the pressure in the cascade area to be maintained slightly above atmospheric? In the event of an accidental release of a toxic gas in the cascade area, would it not be in the interest of public safety to have the pressure within the building to be slightly less than atmospheric?

2. (Page 12, Table 2.2) Why will the electric and the compressed air demands for Facility-2 be so much greater than those for Facility-1?

3. (Page 13, line 17) Provide more detailed information about presently overtaxed drain pipes resulting from water infiltration into the Oliver Springs sanitary waste facility during periods of heavy rainfall. Also indicate when Oliver Springs expects to replace the leaking pipes and how AlChemIE's facilities or the environment might be affected if AlChemIE's facilities go into operation before the leaking pipes are replaced.

4. (Page 15, Table 2.3) Why will Facility-2 produce so much more commercial garbage and solid ChemWaste than Facility-1? In addition, explain why Facility-2 will produce less oils and solvents for commercial disposal, more ChemWaste in oils and solvents, and more oils and solvents from the TOSCA or RCRA facility, than will be produced by Facility-1.

5. (Page 19, line 10) Obtaining data on terrestrial fauna specific to the Oliver Springs area should not pose an unreasonable or expensive task. In the absence of data one could not expect there to be any evidence of threatened or endangered species, even if such were present. A survey of the fauna of the area should be conducted and the results made known to the Board.

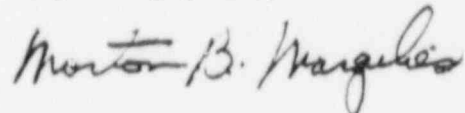
6. (Page 25, line 7) Staff states that "AlChemIE will apply to the *** TDHE for an air permit", whereas at page 23, line 19 of the Assessment

October 18, 1988

for Facility-1 it was stated that "AlChemIE has applied *** to TDHE for an air permit." Does this mean that AlChemIE has an application for Facility-1 pending but has not yet submitted an application for Facility-2? If so, when does AlChemIE expect to submit its application for a permit for Facility-2? 7. (Page 25, line 20) Why doesn't AlChemIE attempt to make specific estimates of the release fraction from Facility-2 so that the Staff's assessment can be more specific than merely stating the the release fraction from Facility-2 "may be higher" because of the higher vapor pressure of some of the process materials and the "likely" greater number of cyclinder connections and number of cascades in operation at one time?

It would be helpful to have the information requested and Staff's estimates of the environmental effects as soon as practicable in advance of hearing.

Very truly yours,



Morton B. Margulies, Chairman
Administrative Law Judge

cc: Service List