

Standard Oil  
Chemical Company  
Ft. Amanda Road  
P.O. Box 628  
Lima, Ohio 45802-9983

RETURN TO 396-SS

40-7604  
PDR

STANDARD OIL  
CHEMICAL

June 13, 1986

U.S. Nuclear Regulatory Commission  
Division of Fuel Cycle and Material Safety  
7315 Eastern Avenue  
Silver Springs, Maryland 20910

ATTN: Donald A. Cool, Ph.D.

Dear Dr. Cool:

Standard Oil Chemical Company (formerly Sohio Chemical Company) is progressing on the path toward termination of our NRC license. We are presently working with Nuclear Energy Services to develop an overall decontamination plan which will apply to all contaminated areas of the plant.

I have attached a copy of the draft decontamination plan outline for your review. Please be kind enough to contact me with any questions or comments that you might have. Our current plan is to complete the decontamination plan and have it ready for NRC review later this summer. Please let me know if there is anything that we can do to expedite your review.

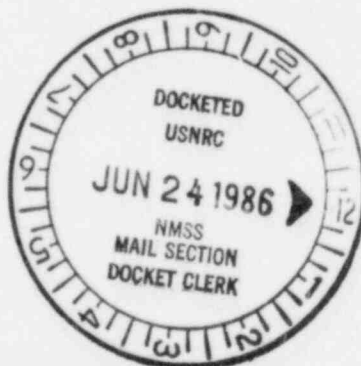
Thank you for your cooperation.

Sincerely,

*Ray Sudheimer*

R. A. Sudheimer

6-14  
RAS/jmb  
Attachment



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PDR ADOCK 04007604  
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# COMMENT ISSUE

**NES**

NES Project 5436  
Ref: WMS-1039

## DECONTAMINATION PLAN

### OUTLINE

#### I. SUMMARY

(The purpose of the decontamination plan, approach for field activities, and any modifications to the plan will be included in this section.)

1. Objective
2. Approach
3. Decon Plan Modifications
4. Conclusion

#### II. CURRENT STATUS

(Condensed radiological information will be presented in this section for each of the six areas to be cleaned-up.)

1. General
2. Catalyst Plant and adjacent outdoor areas & buildings
3. Acrylonitrile Plant #1
4. Storage Area (near setting tank & thermal oxidizer)
5. Acrylonitrile Plant #2
6. Urea Warehouse #1 (Central Stores)
7. Pond Areas (Burning Pond/Celite Pond/Deepwell Pond/

Holding Ponds 1 & 2)

#### III. QUALITY ASSURANCE PROGRAM (NES Document No. 83A2487)

(The QA Program shall define the policies & practices to be followed during the implementation of the decon plan and shall ensure compliance with the requirements of 10CFR, 49CFR, 40CFR, and 29CFR as applicable.)

1. Introduction

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2. Organization
  - 2.1 Program Organization
  - 2.2 Program Responsibilities
  - 2.3 Communication and Authority Guidelines
3. Program Design and Control
  - 3.1 Design Criteria
  - 3.2 Control Implementation
  - 3.3 Program Review
  - 3.4 Specific Program Requirements
4. Program Documents
5. Records
6. Audits

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## IV. GENERAL RADIOLOGICAL CONTROLS & SAFETY PROCEDURES

- (R) 1. Radiological Control Plan/NES Document No. 83A2957

(States the radiation protection standards and controls in effect for all decon activities; including personnel training and exposure, areas and materials, radiological monitoring, unrestricted control guidelines, decon methods.)
- (R) 2. Radiological Quality Assurance and Control Procedure/  
NES Document No. 83A2958

(Describes programs for assuring quality of radiological measurements and analyses in the field. States specific requirements for identification of responsible individuals, and assures that the precision and confidence level of the survey results is adequate.)
- (R) 3. Radiation Worker Handbook & Training Manual/  
NES Document No. 83A2959

(Contains necessary radiological information needed by a radiation/decon worker in order to satisfy requirements of the Radiological Control Plan. Includes a short course in H.P. practices, definitions, risks, responsibilities, radiation and contamination measurement and controls, and applicable references.)
- (R) 4. Calibration and Maintenance of Survey Instruments/  
NES Document No. 83A2960

(Establishes the calibration and maintenance criteria for radiological instrumentation used during the decon activities. Also provides a list of applicable records to be kept per QA Program requirements.)
- (R) 5. General Radiological Survey Procedure/NES Document No. 83A2961

Delineates the specific techniques to be applied when performing surface and air surveys. Includes sample preparation guidelines.)

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- (R) 6. Surface Contamination Program/NES Document No. 83A2962

(States the specific step by step activities required to measure, control, and remove surface contamination. Protective clothing, containments and ventilation requirements are included.)
- (R) 7. Airborne Radioactivity Program/NES Document No. 83A2963

(Presents specific requirements and procedures for maintaining concentrations of airborne radioactivity below the established limits. Includes a respiratory protection program.)
- (R) 8. Radioactive Check Sources, Accountability & Control/  
NES Document No. 83A2964

(Details the policies and practices for controlling and accounting radioactive check sources. Includes appropriate inventory and check cards.)
- (R) 9. Radiation Work Permit Procedure/NES Document No. 83A2965

(Presents Radiation Work Permit (RWP) form to be used during any decon operation. The RWP states personnel protection requirements and radiological conditions of the area to be worked on.)
- (R) 10. Emergency Actions Procedure/NES Document No. 83A2966

(Details the proper actions to be taken in the event of an emergency in a rad con area, including personnel injury and contamination.)
- (R) 11. Radioactive Waste Packaging Procedure/NES Document No. 83A2967

(Provides specific instructions for the packaging of radioactive waste, including 1) volume reduction and segregation techniques, 2) selection of shipping/burial/storage containers, and 3) marking and labeling of containers.)

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**R**

12. Handling, Storage and Disposal of Radioactive Waste/  
NES Document No. 83A2968

(Sets forth the requirements and procedures for controlling radioactive material (RAM) during handling, transfer and storage phases. Includes identification and inventory of RAMs.)

**S**

13. General Industrial Safety Procedure/NES Document No. 83A2969

(Outlines generic aspects of industrial safety per 29CFR1910 requirements. Includes preventive and response actions involving traumatic events and compliance with 40CFR261-265 requirements.)

**R**

14. Removal of Asbestos Insulating Material/NES Document No. 83A2970

**S**

(Specifies approvals, work methods, exposure controls, and waste handling techniques to be implemented when removing asbestos insulating material from pipes and ducts. Meets the requirements of 29CFR1910.1001.)

**S**

15. Handling and Disposal of Hazardous & Non-Hazardous Waste/  
NES Document No. 83A2971

(Establishes special precautions and procedures required for the control and handling of hazardous materials. Specifies the different permits/requirements for local (non-hazardous waste) disposal sites and EPA (hazardous waste) approved landfills.)

**R**

16. Design and Operating Guidelines for an On-Site Mixed Waste  
Storage Facility/NES Document No. 83A2972

**S**

(Presents design parameters and operating control procedures for a site storage facility capable to store hazardous and radioactive (mixed) waste. Includes required monitoring equipment and positive controls access.)

**S**

17. Housekeeping Procedure/NES Document No. 83A2973

(Provides guidelines for the housekeeping in those areas where decon operations are being performed.)

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## V. SPECIFIC WORK PACKAGES

Each of the six (6) Decontamination Work Packages (DWPs) will be site specific and will provide the decon contractor with sufficient information and instructions regarding what, where and how to clean-up the designated surface and/or equipment.

As a minimum, the following sections shall be part of the DWPs.

1. Description of Work
2. Personnel and Equipment/Materials Requirements
3. Definitions
4. Prerequisites
5. Detailed Procedure
6. Final Site Survey

Appendix (Attachments, Tables, figures, forms, etc.)

1. Catalyst Plant Decon Work Package/NES Document No. 83A2974
2. Acrylonitrile Plant #1 Decon Work Package/  
NES Document No. 83A2975
3. Storage Area Decon Work Package/NES Document No. 83A2976
4. Acrylonitrile Plant #2 Decon Work Package/  
NES Document No. 83A2977
5. Urea Warehouse #1 Decon Work Package/  
NES Document No. 83A2978
6. Pond Areas Decon Work Package/NES Document No. 83A2979

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CONTROL NO. 27129  
DATE OF DOC. 06/13/86  
DATE RCVD. 06/24/86  
FCUF ☒ PDR ☒  
FCAF ☐ LPDR ☐  
I & E REF. ☒  
SAFEGUARDS ☐  
FCTC ☐ OTHER ☐  
DATE 6/24/86 INITIAL CCA