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May 7, 1999

Mr. Timothy C. Johnson, Section Leader
Materials Decommissioning Section
US Nuclear Regulatory Commission
Decommissioning and Regulatory Issues Branch
11555 Rockville Pike
Washington DC 20555

Re: Chemetron Corporation Submittal of Records Pursuant to 10 CFR 40.42(k)(4) License Number
SUB-1357, Docket Number 040-08724

Dear Mr. Johnson:

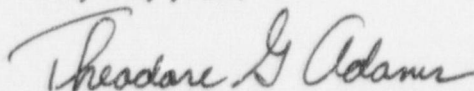
This letter documents the submittal of records required by 10 CFR 40.6(d) and (f) by the Chemetron Corporation to fulfill the requirements of 10 CFR 40.42(k)(4). These records are provided in order to support the termination of the Chemetron Corporation license.

Chemetron Corporation compliance with the 10 CFR 40.42(k)(4) requirements is demonstrated in Enclosure 1. The actual records being submitted to the NRC and the related Record Inventory Sheet are contained in Enclosure 2.

In accordance with 10 CFR 40.61(f) and discussions with Mr. Dave Nelson, Inspector, USNRC-Region III, the records listed in the inventory are being transmitted to NRC Region III to the attention of Mr. Dave Nelson.

If you have any questions, please give me a call at (716) 592-3431.

Very truly yours,



Theodore G. Adams
Technical Manager

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C PDR

Enclosure

cc: B. Koh, w/enclosure 1
D. Nelson, w/enclosures 1 and 2
J. Brendel, w/enclosure 1
J. Kelley, w/enclosure 1

**DEMONSTRATION OF CHEMETRON CORPORATION'S
COMPLIANCE WITH 10 CFR 40.42(k)(4)**

GENERAL

Chemetron Corporation is the holder of License Number SUB-1357. In a letter to the NRC dated November 10, 1998, Chemetron Corporation requested that the license be terminated.

Section 40.42(k)(4) requires that Chemetron Corporation submit to the NRC records required by Section 40.61(d) and (f) in support of license termination. Presented in the subsequent paragraphs is a demonstration of Chemetron Corporation's compliance with this section and related subsections.

Section 40.61(d)(1)

This section requires that Chemetron Corporation provide NRC with records of disposal of licensed material (depleted uranium-DU) made under 20.2002. Chemetron Corporation disposed of depleted uranium pursuant to Section 20.2002 at two locations: Harvard Avenue and Bert Avenue. This disposal is discussed below:

Harvard Avenue

The Harvard Avenue site is located on the McGean-Rohco Chemical property, 2910 Harvard Avenue, Cuyahoga Heights, Ohio. The site is located west of the current Building 20.

Pertinent records of disposal of the DU in the closure cell at the Harvard Site are:

- Site Remediation Plan, Rev. 1 dated February, 1995
- Final Site Radiation Survey Report dated November, 1996
- Engineering Closure Report dated February, 1998
- Form 314 via letter dated November 10, 1998

The Site Remediation Plan was submitted to the NRC-HQ on February 28, 1995. The Final Site Radiation Survey Report was submitted to the NRC-HQ on November, 1996. The Engineering Closure Report for the Harvard Avenue Site is enclosed as part of the transmitted records (see Enclosure 2). Form 314 was transmitted to the NRC-HQ on November 10, 1998.

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Bert Avenue

The Bert Avenue site is located on the McGean-Rohco property located at the end of E. 27th and E. 29th Streets in Newburgh Heights, Ohio. The property is bounded by Holcomb Road to the east, LTV to the North and the Newburgh Heights Village Park to the west. Pertinent records of the DU dispositioned in the closure cell at the Bert Avenue are:

- Site Remediation Plan, Rev. 1 dated February, 1995
- Final Site Radiological Status Survey Report dated September, 1998, as revised October 1998
- Engineering Closure Report dated March 1999
- Form 314 via letter dated November 10, 1998

The Site Remediation Plan was submitted to the NRC-HQ on February 28, 1995. The Final Site Radiological Survey Report for the Bert Avenue Site was submitted to the NRC-HQ on October 5, 1998. The Engineering Closure Report for the Bert Avenue Site is enclosed as part of the transmitted records (see Enclosure 2). Form 314 was submitted to the NRC-HQ on November 10, 1998.

Section 40.61(d)(2)

This section requires that Chemetron Corporation provide NRC with the records required by Section 20.2103(b)(4).

Section 20.2103(b)(4)

This section requires that Chemetron Corporation provide NRC with records of the results of measurements and/or calculations used to evaluate the release of radioactive effluents to the environment.

Documentation of the results of measurements and calculations to evaluate the release of radioactive effluents from the McGean Rohco facility and the Harvard Avenue and Bert Avenue sites are limited to those releases during the remediation of these facilities/sites. Records of effluent releases during the operational phase of the Catalyst 21 manufacturing process do not exist. Release of effluents to the environment during remediation of the McGean Rohco buildings

**DEMONSTRATION OF CHEMETRON CORPORATION'S
COMPLIANCE WITH 10 CFR 40.42(k)(4)**

and the Harvard Avenue and Bert Avenue sites are recorded in the following documents:

- Air Monitoring Data - (See Enclosure 2)
- Groundwater Monitoring Data - (See Enclosure 2)
- Surface Water Data - (See Enclosure 2)

Section 40.61(f)

This section requires Chemetron Corporation to forward the records required by Section 40.36(f) to NRC Region III. The subsequent paragraphs provide the Chemetron Corporation responses to the subsections contained under 40.61(f).

Section 40.61(f)(1)

Chemetron Corporation has no specific records of spills or other unusual occurrences involving the spread of contamination in and around the McGean-Rohco facility/equipment or at Harvard Avenue or Bert Avenue sites. Site histories and operational knowledge related to the location of the DU at these three locations is documented in the Site Characterization Report (June 1992) and the Site Remediation Plan, Rev. 1 (February 1995).

Section 40.61(f)(2)

Building 21 (DU Catalyst Manufacturing Facility) was demolished during the period of 1976-1985 and no longer exists. Therefore, Chemetron Corporation has no specific as-built drawings or modifications of structures and equipment in restricted areas where the DU was used, and/or stored or of locations of possible inaccessible contamination such as buried pipes which may be subject to contamination.

As-built drawings of the Harvard Avenue Closure Cell are contained in the Harvard Avenue Engineering Closure Report (February 1998) (See Enclosure 2).

As-built drawings of the Bert Avenue Closure Cell are contained in the Bert Avenue Engineering Closure Report (March 1999) (See Enclosure 2).

**DEMONSTRATION OF CHEMETRON CORPORATION'S
COMPLIANCE WITH 10 CFR 40.42(k)(4)**

Section 40.61(f)(3)

- (i) Chemetron Corporation has no records documenting areas designated or formally designated as restricted areas as defined under 10 CFR 20.1003 for the time during which the DU catalyst operations were in effect, since Building 21 was razed and the surrounding soils remediated.

Documentation of designated restricted areas at the time of remediation are documented in the Site Remediation Plan, Rev. 1 (February 1995). All radiological restrictions have been removed.

- (ii) Chemetron Corporation has no records documenting areas outside of restricted areas that require documentation under 40.36(f)(1). See Chemetron Corporation's response to 40.61(f)(1).
- (iii) Chemetron Corporation is not aware of any areas outside of previously restricted areas where current or previous wastes have been buried or documented under 10 CFR 20.2108.
- (iv) Chemetron Corporation has decontaminated all previously contaminated McGean-Rohco buildings, has remediated the contaminated soils on the Harvard Avenue and Bert Avenue sites in closure cells per 20.2002 and has shipped substantial quantities of contaminated material/soils offsite to licensed disposal facilities (Site Remediation Plan, Rev. 1 dated February, 1995 and Chemetron Corporation letter to NRC dated November 10, 1998). In addition, Chemetron Corporation has obtained NRC release for unrestricted use for these areas, as documented in the Chemetron Corporation letter to the NRC dated November 10, 1998.

Chemetron Corporation is not aware of any areas outside of previously restricted areas (at the time of remediation) that contain DU such that if the Chemetron Corporation license would expire, Chemetron Corporation would be required to either decontaminate the area(s) or apply for disposal under 20.2002.

Section 40.61(f)(4)

Records of the cost estimate performed for the decommissioning funding plan and the funding method for assuring funds are documented in Section 5 of the Site Remediation Plan, Rev. 1 (February 1995).

**CHEMETRON CORPORATION REMEDIATION PROJECT
RECORDS INVENTORY SHEET**

| | | |
|---------------|-----------------------------|--|
| BOX 1: | NES Air Samples - | McGean-Rohco (prior to 1994) |
| | Bert Avenue 1998 - | Environmental Air Samples Occupational Air Samples |
| | Harvard Avenue 1996 - | Environmental Air Samples Occupational Air Samples |
| | Bert/Harvard/McGean-Rohco - | Liquid Discharge Samples |
| BOX 2: | Bert Avenue 1997 - | Environmental Air Samples Occupational Air Samples Harvard Avenue Engineering Report Bert Avenue - Engineering Report |
| BOX 3: | McGean-Rohco (1993-1996) | Building Decontamination/Maintenance Occupational Air Samples |