Dr. Clark W. Smith Chairperson Radiation Safety Committee Pharmacia & Upjohn, Inc. 301 Henrietta Street Kalamazoo, MI 49007

SUBJECT: 10 CFR 20.304 LAND BURIALS AT THE UPJOHN FARMS COMPLEX

Dear Dr. Smith:

This refers to your April 11, 1997, and March 9, 1998, submittals in response to NRC Information Notice 96-47, "RECORD KEEPING, DECOMMISSIONING NOTIFICATIONS FOR DISPOSALS OF RADIOACTIVE WASTE BY LAND BURIAL AUTHORIZED UNDER FORMER 10 CFR 20.304, 20.302, AND CURRENT 20.2002."

Based on our review of your assessment regarding the former burials, we have concluded that the potential dose which could result from these past burials is below the NRC dose limit for unrestricted release. This limit is specified in 10 CFR Part 20, Subpart E, "Radiological Criteria for License Termination." Therefore we agree with Pharmacia & Upjohn's position that no further action is required and we have no objection to the release of the site for unrestricted use.

Please note that the historical records relating to the above burial of licensed material, and the information used as a basis for the dose assessment must be maintained, pursuant to 10 CFR Part 30, Section 30.35, "Financial Assurance and Recordkeeping for Decommissioning," and may be subject to inspection by NRC, until Pharmacia & Upjohn's license has been terminated.

Should you have any questions regarding the above, please contact Dr. Peter Lee at (630) 829-9870 or myself at (630) 829-9615.

Sincerely.

Original Signed by

9804290177 980424 PDR ADOCK 03004781

Bruce L. Jorgensen, Chief Decommissioning Branch

License No. 21-00182-03 Docket No. 030-04781

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