



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

November 21, 2001

J. Dehmel

Mr. Mark Puett
Manager, Environmental Affairs
Mallinckrodt Chemical, Inc.
Mallinckrodt & Second Streets
P.O. Box 5439
St. Louis, MO 63147

SUBJECT: RESPONSE TO NOVEMBER 15, 2001, LETTER REGARDING THE RELEASE
OF BUILDING 204

Dear Mr. Puett:

I am responding to your letter dated November 15, 2001, which requests approval of a proposed methodology for removing Building 204 from the Phase 1 Decommissioning Plan (DP). In the letter, you state that Building 204 was never used to process or handle regulated radioactive material and therefore, any potential contamination would be due to airborne depositions on the exterior of the building. Site characterization data submitted to the U.S. Nuclear Regulatory Commission (NRC) on October 1, 2001, indicates that radiation levels on the exterior of the building are at or near background.

In response to an earlier request by Mallinckrodt Chemical Inc. (Mallinckrodt) to remove Building 204 from the DP, NRC provided Mallinckrodt with the following options: (1) survey and release the building in accordance with License Condition 16; or (2) survey and release the building in accordance with an approved DP. Your letter requests that NRC consider an alternative option. Mallinckrodt is proposing to have an NRC licensed contractor remove exterior building surfaces having the highest potential for contamination (roof, downspouts, and rooftop apparatus), for transfer and disposal at Waste Control Specialists (WCS). Mallinckrodt proposes to survey the pavement adjacent to downspout discharge points in accordance with License Condition 16. Any pavement which is not in compliance with the unrestricted release criteria in License Condition 16, will be excavated and disposed of with the roofing material.

On April 17, 2000, Mallinckrodt submitted a dose assessment to the NRC demonstrating that the potential dose due to the disposal of waste at WCS, containing less than 0.05% source material by weight, is less than 25 mrem. Since analysis of roofing material indicates that its radioactivity is at or near background levels, Mallinckrodt contends that the dose assessment submitted earlier is also applicable to the waste from Building 204.

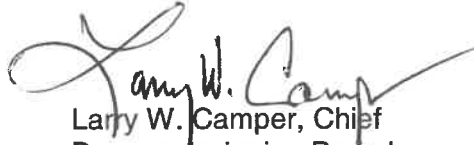
M. Puett

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The NRC finds your proposed approach to be acceptable. Please provide us the name and license number of the contractor who will perform the remediation work. In addition, provide a schedule for activities so that NRC can conduct an in-process inspection.

If you have any questions, please call John Buckley at (301) 415-6607.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry W. Camper". The signature is fluid and cursive, with a large initial "L" and "C".

Larry W. Camper, Chief
Decommissioning Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

Docket No. 040-06563
License No. STB-401

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