



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

JC Dehmel
10-20

MEMORANDUM TO: Robert A. Nelson, Section Chief
Facilities Decommissioning Section
Decommissioning Branch, DWM

FROM: John T. Buckley *JTB*
Facilities Decommissioning Section
Decommissioning Branch, DWM

SUBJECT: MEETING REPORT FOR THE OCTOBER 13, 2000, MEETING WITH
MALLINCKRODT INC.

On October 13, 2000, U.S. Nuclear Regulatory Commission (NRC) staff members met with representatives of Mallinckrodt Inc. to discuss various issues related to Phase 1 decommissioning of its facility. Attached is the meeting report documenting this meeting.

Attachment: Meeting Report

Docket: 040-06563
License: STB-401

cc: M. Puett, Mallinckrodt, Inc.
H. Morton, Morton & Associates

MEETING REPORT

Date: October 13, 2000

Time: 8:30 am to 4:00 pm

Place: Mallinckrodt Inc.
Mallinckrodt & Second Streets
St. Louis, MO

Purpose: To Discuss Various Issues Related to Mallinckrodt Inc.'s Phase 1 Decommissioning Plans, and to tour the Mallinckrodt Inc. facility

Attendees: NRC
John Buckley
Jean Claude Dehmel

Mallinckrodt
Mark Puett
Bob Boland
Jim Adams
Mark Burkot
Jim Grant
Henry Morton

Background:

On November 11, 1997, Mallinckrodt Inc. (Mallinckrodt) submitted its Phase 1 Decommissioning Plan (DP) to the U.S. Nuclear Regulatory Commission (NRC) for review and approval. Phase 1 of the decommissioning process includes demolition or decontamination of above ground buildings and equipment. Phase 2 includes the cleanup of surface and subsurface soils and building foundations. Mallinckrodt is scheduled to submit its Phase 2 DP in December 2001. Most (approximately 70-80%) of the contamination at the Mallinckrodt facility is being remediated under the U.S. Department of Energy's Formerly Utilized Sites Remedial Action Program (FUSRAP) program managed by the U.S. Army Corps of Engineers. The remainder of the material is being cleaned up by Mallinckrodt to terminate its NRC license.

Discussion:

The meeting began with a tour of the Mallinckrodt facility. The NRC staff was especially interested in viewing the buildings which Mallinckrodt has proposed to survey, remediate (if necessary), and release for unrestricted use. NRC and Mallinckrodt staff discussed details of Mallinckrodt's final survey plan for these buildings.

The second major item on the agenda was a discussion of NRC's comments on Mallinckrodt's revised DP. NRC submitted comments to Mallinckrodt on August 7, 2000 (NRC ADAMS Accession No. ML003735400). As a result of the September 21, 2000, meeting with Mallinckrodt (NRC ADAMS Accession No. ML003753917) general agreement was reached on the resolution of all comments with the exception of Comments 5.b, 15.1a, 15.1f and 15.2. Mallinckrodt discussed their proposed approach for dealing with each of these.

The third major item on the agenda was a discussion of NRC's comments on the final survey plan that were provided to Mallinckrodt during the September 21, 2000 meeting. Mallinckrodt

discussed its response to all comments in the attachment with exception of Comments 3, 6b, 6d, and 8. Mallinckrodt is still working on responses to these comments.

NRC also presented its observations made during the site tour. A discussion of these observations is attached.

The last agenda item was a discussion about the date of the next meeting. NRC proposed that the next meeting be held after Mallinckrodt has completed its response to NRC's comments which have not been resolved. Mallinckrodt agreed.

Actions:

Mallinckrodt informed NRC that it was not receiving copies of Meeting Reports. NRC agreed to send Mallinckrodt copies.

Observations
Oct. 13, 2000
Meeting and Site Tour at Mallinckrodt Inc. (Mallinckrodt)

The following issues were discussed during the site tour of buildings and meeting held with the licensee's staff.

1. Some building designations given the DP are not consistent with current nomenclature. For example Fig. 2-2 of the DP refers to Bldg 201, while the current site map identifies it as Bldg 260.
2. Some structures shown in the DP are no longer identified in the current site map. For example Fig. 2-2 of the DP refers to Bldg 221, while the current site map no longer identifies it.
3. Some buildings depicted in the DP are not consistent with the current site map. For example Fig. 2-2 of the DP shows Bldg 235 in one configuration, while the current site map shows it with an additional wing.
4. The description of buildings slated for survey and release (e.g., Table 1-5 of the DP) is not consistent with the information presented during the site tour. For example, while the DP refers to Bldg 250, the tour indicated that only specific sections of buildings will be subject to final surveys. The DP should clearly identify which sections of each building will be included in the final survey. The areas of concern in each building include, among others, specific rooms, roofs, staircases, labs, floor drains, remodeled/refurbished areas, and equipment (e.g., hoods, duct work, exhaust fans, lab sinks, bench tops, crane, etc.). This aspect applies to other buildings as well, e.g., Bldg 510, 503, 501, 240, 91, and 90.
5. During the site tour, the NRC staff examined the condition of building floors planned for removal during Phase 2 decommissioning. The DP is silent on how building slabs and foundations will be sealed after all superstructures are demolished during Phase I since slabs and foundations will be demolished during Phase II. As agreed between NRC and Mallinckrodt during the September 21, 2000, meeting, the DP needs to clearly indicate that the radiological conditions of slabs and foundations will be determined before being sealed and provide examples of the methods that will be used to seal surfaces with residual contamination until the start of Phase II remediation activities.
6. Mallinckrodt noted during the tour that specific areas in some buildings (e.g., Bldg 250) were used to test the MARSSIM site survey process. Mallinckrodt made its best effort to anticipate what the DQOs and MARSSIM requirements would be for the final survey. NRC questioned the validity of using past surveys in documenting current radiological conditions. Mallinckrodt acknowledged that it must demonstrate that any site characterization data used for the final survey, meets final survey requirements.

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