

Mr. Anthony T. Campitelli  
Manager, Environmental Affairs  
Cabot Performance Materials  
P.O. Box 1608  
County Line Road  
Boyertown, Pennsylvania 19512-1608

SUBJECT: CHANGE IN PLANT RADIATION SAFETY OFFICER POSITION  
(TAC NO. L31249)

Dear Mr. Campitelli:

In accordance with your application dated August 11, 1999, and supplement dated September 21, 1999, and pursuant to Part 40 to Title 10 of the Code of Federal Regulations, Material License SMB-920 is hereby amended to incorporate a change in the Plant Radiation Safety Officer (PRSO) position.

Accordingly, License Condition 10 has been revised to read as follows:

10. Authorized use: Receipt, possession, and processing at the Boyertown, Pennsylvania, facility in accordance with the statements, representations, and conditions specified in the licensee's revised application dated March 16, 1994; and supplements dated May 24, August 17, and October 31, 1995; February 26, March 13, April 10, and November 26, 1996; February 13, 1997; August 11 and September 21, 1999.

All other conditions of the license shall remain the same.

Enclosed are copies of the revised Materials License SMB-920 and the Safety Evaluation Report, which includes the Categorical Exclusion determination.

Mr. A.T. Campitelli

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If you have any questions regarding this matter, please contact Ms. Leslie Fields, Project Manager at (301) 415-6267 or email at [lcf@nrc.gov](mailto:lcf@nrc.gov).

Sincerely,

Theodore S. Sherr, Chief  
Licensing and International  
Safeguards Branch  
Division of Fuel Cycle Safety  
and Safeguards, NMSS

Docket 40-6940  
License SMB-920  
Amendment 3

cc: Mr. Timothy Knapp

Enclosures: 1. Materials License SMB-920  
2. Safety Evaluation Report

Mr. A.T. Campitelli

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DOCKET: 40-6940

LICENSEE: Cabot Performance Materials  
Boyertown, Pennsylvania

SUBJECT: SAFETY EVALUATION REPORT: CHANGE IN PLANT RADIATION SAFETY  
OFFICER (PRSO) POSITION

### BACKGROUND

On August 11, 1999, Cabot provided an amendment application with supplement dated September 21, 1999, to change the Plant Radiation Safety Officer position and remove all references to staff names in the license. The subject of this Safety Evaluation Report (SER) is to evaluate the qualifications of the new PRSO and update the current license by removing staff names from the license.

### DISCUSSION

The new PRSO, Mr. Timothy Knapp, meets the requirements of training and experience in accordance with 10 CFR 40.32 (b). The responsibilities of the new PRSO will include monitoring operation to protect health and assure compliance with applicable regulations, supervising the health surveillance program, training personnel, and obtaining permits and registrations related to the handling of radioactive material.

Cabot states that the new PRSO satisfies all license requirements for the PRSO position. The minimum technical qualifications as stated in the license remain unchanged and include the following: Bachelor's degree, completion of a basic 40-hour course in radiation safety, and two years experience in handling of radioactive materials. On August 11, 1999, Cabot confirmed by letter that Mr. Knapp will perform full-time duties to ensure that personnel are aware of potential risks associated with the operations.

Mr. Knapp has a B.S. in Physics and an M.S. in Environmental and Occupational Health with 5 years industrial experience related to radioactive material processing. His duties have included packaging and disposal of radiological waste, coordinating incident and spill response activities, managing an internal dosimetry program including thyroid monitoring and urinalysis, and training staff workers on an as needed basis. Furthermore, Mr. Knapp has completed the required radiation safety officer training. NRC staff has determined that the training and experience of Mr. Knapp is adequate and in accordance with 10 CFR 40.32 (b), and that Mr. Knapp is qualified to serve as PRSO.

NRC staff believes that a qualified PRSO should be onsite during licensed activities, though it is unnecessary to specify the names of the PRSO and other staff members in the license. Accordingly, the staff recommends that License Condition 10 be revised as follows:

10. Authorized use: Receipt, possession, and processing at the Boyertown, Pennsylvania, facility in accordance with the statements, representations, and conditions specified in the licensee's revised application dated March 16, 1994; and supplements dated May 24, August 17, and October 31, 1995; February 26, March 13, April 10, and November 26, 1996; February 13, 1997; August 11 and September 21, 1999.

#### CATEGORICAL EXCLUSION

The changes are considered administrative in nature. The staff has determined that the proposed changes do not adversely effect public health and safety or the environment and are categorically excluded from the requirement to prepare a site-specific environmental assessment. Therefore, in accordance with 10 CFR 51.22(c)(11), neither an environmental assessment nor an environmental impact statement is warranted for this action.

#### CONCLUSION/RECOMMENDATION

NRC staff has reviewed the licensee's proposed amendment and has determined that the proposed changes will have no adverse affect on public health and safety or the environment.

Region I inspection staff has no objection to this proposed amendment.

Approval of the amendment application is recommended.

#### PRINCIPAL CONTRIBUTOR

Leslie C. Fields

**MATERIALS LICENSE**

**CORRECTED COPY**

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 36, 39, 40, and 70, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

Licensee	
1. Cabot Corporation	3. License Number SMB-920 Amendment 3
2. County Line Road Boyertown, PA 19512	4. Expiration Date December 31, 2001
	5. Docket No. 40-6940 Reference No.

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|--|----------------------------------|--|
| 6. Byproduct Source, and/or Special Nuclear Material | 7. Chemical and/or Physical Form | 8. Maximum amount that Licensee May Possess at Any One Time Under This License |
| Natural uranium and thorium                          | Any                              | 400 tons as elemental uranium and thorium                                      |
9. Authorized place of use: The licensee's facility at County Line Road, Boyertown, Pennsylvania.
  10. Authorized use: Receipt, possession, and processing at the Boyertown, Pennsylvania, facility in accordance with the statements, representations, and conditions specified in the licensee's revised application dated March 16, 1994; and supplements dated May 24, August 17, and October 31, 1995; February 26, March 13, April 10, and November 26, 1996; February 13, 1997; August 11 and September 21, 1999.
  11. The licensee shall document all ALARA Committee's recommendations for achieving ALARA in radiation protection, proposed in each meeting. A copy of the recommendations shall be provided to the General Manager.
  12. Deleted by Amendment 1, June 1997.
  13. Release of equipment, facilities, or packages to the unrestricted area or to uncontrolled areas onsite shall be in accordance with the "Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use or Termination of Licenses for Byproduct, Source, or Special Nuclear Material," dated April 1993.

**MATERIALS LICENSE  
SUPPLEMENTARY SHEET**

License Number

SMB-920 Amendment 3

Docket or Reference Number

40-6940

CORRECTED COPY

14. The licensee shall collect the following samples at the Boyertown site and analyze for radioactivity at least quarterly:
- Composite samples from a continuously collected sample of the effluent at Outfall 001 when effluent is discharged.
  - Upstream and downstream water samples (relative to Outfall 001) of West Swamp Creek.
  - Groundwater samples from Monitoring Wells 1a, 2, 3, and 4 identified in Figure 4.1 of NUREG-1027.

If the concentration of any radionuclide in a representative groundwater sample from any of the monitoring wells exceeds 5 percent of the value given in 10 CFR Part 20, Appendix B, Table II, an investigation shall be made to determine the possible cause and appropriate action shall be taken.

If the concentration of a radionuclide exceeds 10 percent of the value in Table II, the licensee shall report the incident to the Administrator, Region I, U.S. Nuclear Regulatory Commission, within 30 days after the analysis is received by the licensee.

- Sediment samples from upstream and downstream locations in West Swamp Creek and immediately downstream of Outfall 001. If gross alpha concentrations exceed 100 pCi/g, an investigation shall be made to determine the cause.

The licensee shall maintain a record of all monitoring results obtained in accordance with this license condition.

15. At intervals not to exceed 24 months, from September 30, 1998, the licensee shall evaluate the decommissioning funding plan and the financial surety arrangements, including the potential cost to dispose of the stored filter cake, to assure that funds will be available for decommissioning. If the licensee determines that the decommissioning cost exceeds the financial surety by 10%, amended financial surety arrangements incorporating the new decommissioning cost shall be provided to NRC within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Date: \_\_\_\_\_

By: Theodore S. Sherr, Chief  
Division of Fuel Cycle Safety  
and Safeguards  
Washington, DC 20555