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Formerly Utilized Sites Remedial Action Program (FUSRAP)

ADMINISTRATIVE RECORD

for Maywood, New Jersey



U.S. Department of Energy

Bechtel

Interoffice Memorandum

To Karen Noey
 Subject Review of Envirocare's NRC License
 File No. 7720/191
 Date January 11, 1994
 From Richard K. Atwood *RKA*
 of FUSRAP
 Copies to G. R. Galen *GRG*
 T. E. Morris
 At Oak Ridge Ext. 4-3599

Per your request, I have reviewed the provisions of Envirocare's NRC license to manage 11e.(2) byproduct material. This review was performed to ensure that there are no flaws in the license that would prohibit FUSRAP from sending 11e.(2) byproduct waste to Envirocare for disposal.

I found no license provisions in the NRC license that precludes FUSRAP from sending 11e.(2) waste to Envirocare for disposal. However, there are restrictions in the license that should be kept in mind by the Waste Management Group when preparing shipments to Envirocare.

First, Envirocare is required, by the terms of its license, to obtain from waste generators, certification that waste received is in fact 11e.(2) material. (See license provision 9.6(c)). FUSRAP provides this certification, but the correct classification of FUSRAP waste takes on greater legal significance as a DOE representative must attest to the waste classification.

Second, all waste received by Envirocare that averages greater than 1000 pCi/g of any radionuclide must be placed in a disposal cell within 10 days of receipt of the shipment. Should the FUSRAP program need to ship large quantities of waste averaging radionuclide concentrations greater than 1000 pCi/g, then Envirocare may impose restrictions on timing of shipments in order for them to meet their NRC license requirements.

Finally, the original NRC license I reviewed, CCN 110906, had page 7 of the license missing. This page is available from the Waste Management group.

If you have any questions, please call me at the number listed above.

ACTION REQ'D	() YES	<input checked="" type="checkbox"/> NO	DATE _____
RESPONSE TO CHRON NO. _____			
<input type="checkbox"/> FFA	<input type="checkbox"/> Permit	<input type="checkbox"/> Milestone	<input type="checkbox"/> Out <input type="checkbox"/> Cont <input type="checkbox"/> FTR <input type="checkbox"/> R-10 <input type="checkbox"/> Y-12 <input type="checkbox"/>

