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June 24, 1994

Mr. Gary L. Shear, Chief
Fuel Cycle and Decommissioning Branch
U.S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, Illinois 60532-4351

SUBJECT: Survey of Cambridge, OH Facility Off-Site Areas

Dear Mr. Shear:

This is in response to your letter of May 19, 1994 and the Nuclear Regulatory Commission's (NRC's) request at a May 26, 1994 meeting that Cyprus Foote Mineral Company (CFM) develop a course of action to address the possible presence of radioactive materials from the Cambridge, OH facility at off-site locations. As requested in the May 19, 1994 letter, a schedule of actions is being provided within thirty days of the May 26, 1994 meeting. CFM generally proposes to establish a database of off-site locations that potentially received slag from the facility, and to perform a survey of those locations.

Since the May 26, 1994 meeting, CFM has taken substantive actions to move forward on this issue, including the following:

- selected a consultant team consisting of Woodward Clyde Consultants and Sanford Cohen & Associates to assist in planning and implementation of the survey;
- initiated discussions with the current facility owner and operator, Shieldalloy, in order to obtain information about Shieldalloy operations and waste management;
- contacted the NRC concerning the availability of files and data; and
- began planning an off-site survey.

A preliminary scope of work for the survey is provided below, and a schedule is enclosed.



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PRELIMINARY SCOPE OF WORK:

The following activities will be performed by CFM:

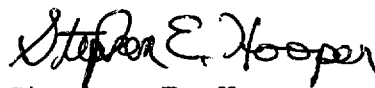
1. Review of documents; interviews: Prior to provision of a draft Work Plan and continuing into the implementation phase, CFM or its consultants will review pertinent data, documents and files (including, to the extent available, site maps, facility drawings, process flow charts, material acquisition and disposal records, site licenses and supporting documentation, inspection records, operating records, and records of radiological surveys). CFM or its consultant will also review the contents of the NRC headquarters and regional dockets and other documents as they become available. CFM or its consultants plan to interview selected current and former Shieldalloy facility employees, public officials and contractor employees with knowledge of materials leaving the site.
2. Work Plan: Draft and final Work Plans and schedules will be prepared, with an intervening review by the NRC. The Work Plan will include the scope of activities, identify methods of site characterization and response parameters, describe methods of data management and evaluation, and provide a schedule. Review of documents, interviews, and a public outreach program for the purpose of constructing a database of potential off-site locations is in progress and will continue during the Work Plan preparation phase of the project.
3. Public outreach: Alternative public outreach programs for gathering information about possible sites where slag was used as fill will be evaluated. The approach most appropriate to accomplish the needs of the survey will be implemented.
4. Implementation of Survey: Survey activities will commence upon finalization of the Work Plan and will be implemented as per the Work Plan. Information from previous or ongoing NRC activities will be incorporated into planning and implementation of the survey.
5. Draft and Final Survey Report: Draft and final reports of survey findings will be provided to the NRC.

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Agreement to design and implement the above-referenced survey is not an admission by CFM of any responsibility or liability for off-site slag disposal from the Shieldalloy site, and CFM specifically reserves its rights to contest any and all legal and factual matters, and raise any defenses, in any judicial or administrative proceeding. CFM reserves its rights to assert claims against any and all parties for the work referenced above. CFM's agreement to perform the above-referenced work is limited to the work described above.

Technical or scheduling issues can be directed to me at 704/734-2709, while legal issues can be directed to Mr. Don Patterson, Esq. at 202/789-6032. The CFM public affairs contact is Mr. Michael Rounds, who can be reached at 303/643-5186.

Very truly yours,



Stephen E. Hooper
Manager, Technical Services

SEH:ssg

cc: C. C. Bromley, Esq.
D. J. Patterson, Esq.

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SCHEDULE OF ACTIONS
FOR CAMBRIDGE, OHIO OFF-SITE SURVEY

<u>ACTION</u>	<u>COMPLETE DATE</u>
Letter Presenting Schedule of Actions	06/27/94
Receipt of Available Documents and Information from NRC and Shieldalloy	07/08/94
Review of Documents, Interviews with Contractors and Facility Staff	Through 07/29/94
Provide Draft Work Plan to NRC for Review	07/29/94
NRC Comment on Draft Work Plan	08/15/94
Provide Final Work Plan to NRC	09/02/94
Implementation of Survey per Work Plan	TBD
Incorporation of Information from On-going NRC Activities	On-going
Draft/Final Report	TBD

TBD - To be determined