

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED: Mallinckrodt Chemical, Inc. / St. Louis, MO		2. NRC/REGIONAL OFFICE REGION III US NUCLEAR REGULATORY COMMISSION 801 WARRENVILLE ROAD LISLE IL 60532-4351	
REPORT NUMBER(S) 040-06563/2008-001			
3. DOCKET NUMBER(S) 040-06563	4. LICENSE NUMBER(S) STB-401	5. DATE(S) OF INSPECTION 7/29-30 & 8/19, 2008	

LICENSEE:

The inspection was an examination of the activities conducted under your license as they relate to radiation safety and to compliance with the Nuclear Regulatory Commission (NRC) rules and regulations and the conditions of your license. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector. The inspection findings are as follows:

- 1. Based on the inspection findings, no violations were identified.
- 2. Previous violation(s) closed.
- 3. The violation(s), specifically described to you by the inspector as non-cited violations, are not being cited because they were self-identified, non-repetitive, and corrective action was or is being taken, and the remaining criteria in the NRC Enforcement Policy, NUREG-1600, to exercise discretion, were satisfied.

_____ non-cited violation(s) were discussed involving the following requirement(s):

- 4. During this inspection, certain of your activities, as described below and/or attached, were in violation of NRC requirements and are being cited. This form is a NOTICE OF VIOLATION, which may be subject to posting in accordance with 10 CFR 19.11.

(Violations and Corrective Actions)

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Statement of Corrective Actions

I hereby state that, within 30 days, the actions described by me to the Inspector will be taken to correct the violations identified. This statement of corrective actions is made in accordance with the requirements of 10 CFR 2.201 (corrective steps already taken, corrective steps which will be taken, date when full compliance will be achieved). I understand that no further written response to NRC will be required, unless specifically requested.

TITLE	PRINTED NAME	SIGNATURE	DATE
LICENSEE			
NRC INSPECTOR	Eugenio A. Bonano	<i>Eugenio A. Bonano</i>	8.19.08

Docket File Information
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6. INSPECTION PROCEDURES USED IP87104		7. INSPECTION FOCUS AREAS Observed removal of contaminated soil from Plant 6W	

SUPPLEMENTAL INSPECTION INFORMATION

1. PROGRAM CODE(S) 11300	2. PRIORITY 5	3. LICENSEE CONTACT Karen M. Burke	4. TELEPHONE NUMBER 314-654-5838
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Main Office Inspection Next Inspection Date: _____

Field Office Inspection _____

Temporary Job Site Inspection Plant 6W, St. Louis, MO _____

PROGRAM SCOPE

The inspector observed: 1) the removal of soil, contaminated with unreacted ore (URO), from burial pits one, two, and three located in Plant 6W; and 2) the loading of the contaminated soil onto rail cars for shipment to Energy Solutions for disposal. The inspector evaluated if activities were being conducted/performed safely and IAW established work plans, procedures, license amendment #4, and NRC regulations. The inspector also reviewed the licensee's QA program for their instrumentation used to perform direct measurements and air monitoring, training, shipping documents, the radiation work permit (RWP) program; and observed the security and control of the site. The inspector reviewed the following documents: "Site Safety & Health Plan," dated July 7, 2008; "Quality Assurance Plan for Removal of URO Trenches One Through Six," date August 8, 2008.

PERFORMANCE OBSERVATIONS

The licensee's contractor removed, and loaded into rail cars, the contaminated soil from burial pits one, two, and three. The work was done safely and in accordance with license amendment #4, work plan titled "Request for NRC License Amendment to Remove URO from Plant 6W," date January 28, 2008; procedures, and NRC regulations. The inspectors performed surveys of restricted and unrestricted areas and did not identify any concerns beyond the excavation sites. Safety meetings were conducted daily before work activities. The inspectors did not identify any concerns.

The licensee's contractor provided their own on-site radioanalytical laboratory services for analyzing the air particulate filter papers used in the air monitoring stations. The inspector reviewed the laboratory's QA process and procedures. Sample preparation and analysis was conducted in accordance with established data quality management objectives and procedures. The training records for two employees were selected and reviewed for completeness and adherence to established procedures. Records for four shipments were reviewed, "Rail Car No. JTLX 85/Shipment #0940-01-0001," "Rail Car No. JTLX 98/Shipment #0940-01-0004," "Rail Car No. JTLX 112/Shipment #0940-01-0002," "Rail Car No. CEFX 35288/Shipment #0940-01-0003." No findings of significance were identified.

The licensee maintains appropriate security and control of material on site in accordance with their procedures and regulatory requirements. All postings are in accordance with 10 CFR 20.