

OCT 06 1993

NOTE TO FILE: Engelhard SDMP Site, Docket No. 70-139
FROM: Jack D. Parrott, Project Manager
SUBJECT: TELEPHONE INTERVIEW WITH JOANNA ALLEN (GAO) REGARDING THE
ENGELHARD SDMP SITE

On September 24, 1993, as part of the Government Accounting Office's (GAO's) review of the Nuclear Regulatory Commission's Site Decommissioning Management Plan (SDMP), I discussed the decommissioning of the Engelhard SDMP site with Joanna Allen of the Detroit office of the GAO. I was provided with a copy of the questions that GAO would be asking via a copy of a letter from Anthony A. Krukowski, GAO, to John Austin dated July 26, 1993.

We discussed; why the site is not currently licensed, how the NRC found out about the site from the Environmental Protection Agency, Region 1 Office, (EPA), and how the NRC, EPA and State of Massachusetts are now fully cooperating in the regulation of this site. My responses to the GAO questions (as asked) are summarized below.

1. *Why was the site listed on the SDMP?*

Because the site has fallen under the authority of the EPA Resource, Conservation and Recovery Act (RCRA) due to the presence of hazardous waste on site, and because of the possibility for mixed waste.

2. *When did the licensee's operations with radioactive materials cease?*

1963.

3. *How was the contamination discovered?*

Engelhard had some institutional knowledge that NRC licensed materials had been used onsite. Therefore, they sampled for radioactivity in conjunction with sampling for RCRA constituents in 1988. The presence of radioactive contamination on site was brought to NRC's attention by the EPA in 1991.

4. *What potential health risk does the site pose?*

All the contamination appears to be underground or in restricted areas of the site. There does not appear to be any offsite migration at this time.

5. *What is the current status of the decommissioning plan? What are the actual and/or projected dates for completion of each phase?*

A. *Site characterization?*

Engelhard has submitted a site characterization plan which has been reviewed by NRC with comments sent back to Engelhard.

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What factors are factors in delaying the cleanup?
There was some delay caused by the involvement of EPA and The State of Massachusetts.
B. **Remediation plan?**
A remediation plan for the buildings has been submitted. It has been reviewed by NRC with comments sent back to Engelhard.

C. **Remediation activities?**

Remediation of the buildings will probably commence this fall or winter. The site remediation schedule is contingent upon the completion of the site characterization report.

D. **Licensee confirmatory survey?**

Not scheduled.

E. **NRC confirmatory survey?**

Not scheduled.

6. **What is the estimated cost of the cleanup, and who prepared the estimate?**

No estimate will be possible until site characterization is complete.

7. **How much money has been set aside for the cleanup, and by whom?**

This site is not licensed therefore there is no requirement for a decommissioning fund.

8. **What was the site's inspection priority before and after placement on the SDMP?**

Since there is no license on this site, it has no formal inspection requirement. However, the site has been visited twice by the regional fuel-cycle inspector since the NRC learned of the radiological contamination at the site.

9. **Have any enforcement actions been taken to expedite the cleanup since placement on the SDMP?**

No.

10. **What factor or factors are delaying the cleanup?**

There was some delay caused by the involvement of EPA and The State of Massachusetts. But once cooperative and public involvement arrangements were worked out, no delays have been encountered.

11. **What are some possible remedies to the factors contributing to the cleanup delay?**

Perhaps a general Memorandum of Understanding between NRC and EPA concerning these types of sites which have both hazardous and radioactive contamination.

12. *What can be done to expedite this cleanup?*

At this point it seems to be progressing in an acceptable manner.

cc:

J.H. Austin
T.C. Johnson