

UNITED NUCLEAR
CORPORATION

For Div. of Compliance

MAY 21, 1965

HEMATITE, MISSOURI 63047
TELEPHONE 314-937-2576

Mr. DONALD A. NUSSBAUMER
U. S. ATOMIC ENERGY COMMISSION
DIVISION OF LICENSING AND REGULATION
ST. ELMO AND NORFOLK STREETS
BETHESDA, MARYLAND

SUBJECT: SNM-33

REFERENCE: YOUR LETTER OF APRIL 21, 1965 TRANSMITTING
SNM-33 AS RENEWED APRIL 21, 1965.

GENTLEMEN:

THIS IS TO ACKNOWLEDGE YOUR REFERENCED LETTER AND PROVIDE YOU WITH OUR
PLANS TO COMPLY WITH THE CONDITIONS IMPOSED UNDER THE LICENSE. THE
IDENTIFICATION OF THE CONDITIONS DISCUSSED BELOW CONFORMS TO THE NUMERICAL
IDENTIFICATION FOLLOWED IN FORM AEC 401.

CONDITION 7 MAXIMUM QUANTITY OF SPECIAL NUCLEAR MATERIAL

THE 2,000 KG INVENTORY LIMIT WILL BE UNDULY RESTRICTIVE. IT IS REQUESTED
THAT SNM-33 BE AMENDED TO PERMIT A MAXIMUM INVENTORY OF 10,000 KG OF
SPECIAL NUCLEAR MATERIAL.

CONDITION 11 SAMPLING OF SCRAP PRIOR TO RECOVERY IN THE GREEN ROOM

OUR INTERPRETATION OF THE REQUIREMENT TO HOMOGENIZE, SAMPLE AND TEST THE
SCRAP FOR TOTAL U AND ENRICHMENT FOLLOWS. YOUR CONCURRENCE WITH THIS
INTERPRETATION IS REQUESTED.

SAMPLING AND TESTING AS REQUIRED BY CONDITION 11 APPLIES ONLY TO;

- A) SCRAP GENERATED EXTERNAL TO UNITED NUCLEAR.
- B) SCRAP GENERATED BY UNITED NUCLEAR WHICH HAS LOST ITS SPECIFIC
IDENTITY OF ENRICHMENT AND/OR URANIUM CONTENT. EXAMPLES OF
THIS TYPE OF SCRAP ARE: RESIDUES FROM EQUIPMENT CLEANUP AND
HOOD SWEEPINGS.

SAMPLING AND TESTING AS REQUIRED BY CONDITION 11 DOES NOT APPLY TO
SCRAP GENERATED BY UNITED NUCLEAR AND WHICH IDENTIFICATION OF THE

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MATERIAL, ENRICHMENT AND TOTAL U CONTENT HAS BEEN ACCURATELY MAINTAINED. EXAMPLES OF THIS TYPE OF SCRAP ARE:

- A) PELLETS PRODUCED IN OUR PELLET PLANT BUT REJECTED BY INSPECTION.
- B) OXIDE OR OTHER URANIUM COMPOUNDS PRODUCED IN OUR MANUFACTURING PROCESS BUT REJECTED BECAUSE OF CHEMICAL PURITY OR OTHER ATTRIBUTES.

CONDITION 12 FIXTURES FOR FLOOR STORAGE IN BUILDINGS 304 AND 401.

WE ARE INVESTIGATING THE USE OF PORTABLE CARTS OR OTHER DEVICES AND WILL ADVISE YOU ON JULY 1, 1965 OF OUR PLANS FOR FULFILLING THIS CONDITION.

CONDITION 13 POSTING NUCLEAR SAFETY LIMITATIONS

WE ARE PROCEEDING WITH THE POSTING OF APPLICABLE SIGNS.

CONDITION 14 OUTSIDE STORAGE AREAS

THE REQUIREMENT TO ERECT A FENCE OR OTHER BARRIER TO RESTRICT AREAS OF UNAUTHORIZED PERSONNEL IS AN UNNECESSARY BURDEN. MOVEMENT OF MATERIAL IN, OUT OR WITHIN THE AREA IS DONE ONLY WHEN DIRECTED BY PLANT SUPERVISION AND THEREFORE, ONLY WHEN AUTHORIZED. WE ARE THEREFORE REQUESTING THAT ERECTION OF A BARRIER AROUND THE STORAGE AREA BE DELETED AS A CONDITION OF THE LICENSE.

WE HAVE DECIDED TO DELETE THE USE OF THE PALLET SHOWN ON FIGURE 502.4-1 AND REPLACE IT WITH PERMANENTLY LOCATED DRUM SUPPORT FRAMES SHOWN ON FIGURE 502.4-1 DATED MAY 21, 1965. THESE FRAMES WILL BE INSTALLED IN THE STORAGE AREA AT SUCH SPACING AS TO MAINTAIN TWO FOOT SURFACE TO SURFACE SPACING OF THE DRUMS IN STORAGE. PLEASE INCORPORATE FIGURE 502.4-1 DATED MAY 21, 1965 INTO THE MANUAL "GENERAL INFORMATION AND PROCEDURES APPLICABLE TO THE HANDLING OF SPECIAL NUCLEAR MATERIAL" AS REVISED JANUARY 22, 1965. IN PLACE OF FIGURE 502.4-1 "SAFE SPACING PALLET". ALSO PARAGRAPH 502.4 OUTDOOR STORAGE, OF THE MANUAL, IS ENCLOSED REFLECTING USE OF THIS SUPPORT FRAME.

CONDITION 15 STORAGE IN BUILDING 251

OUR INTERPRETATION OF THIS CONDITIONS FOLLOWS. YOUR CONCURRENCE IS REQUESTED.

1. ALL STORAGE POSITIONS DESCRIBED IN PARAGRAPH 502.2 OF OUR MANUAL MAY BE USED FOR THE STORAGE OF FIVE-GALLON DRUMS.
2. FIFTEEN-GALLON DRUMS AND THE PELLET SHIPPING DRUM MAY BE STORED IN PLACE OF A FIVE-GALLON DRUM ON THE TOP AND BOTTOM POSITION OF THE RACKS DESCRIBED IN PARAGRAPH 502.2.

CONDITION 16 CRITICALITY CONTROL IN LABORATORY

THE RESTRICTIONS ARE ACKNOWLEDGED. IT IS NOTED THAT THE CONTROL LABORATORY IN BUILDING 240-1 IS NO LONGER IN EXISTANCE.

CONDITION 17 CENTERLESS GRINDER CIRCULATING PUMP TANK, D₂O PROCESS AND
UNSAFE GEOMETRY CONTAINERS

THE SEVERAL COMPONENTS OF THIS CONDITION ARE ACKNOWLEDGED.

CONDITION 18 FULL FACE, AIR SUPPLIED MASK

THIS CONDITION IS ACKNOWLEDGED.

CONDITION 19 SHIPPING PROCEDURES

THIS CONDITION IS ACKNOWLEDGED.

COMMENTS APPLICABLE TO THE LETTER ITSELF:

SECTION VIII OF HEALTH PHYSICS MANUAL

THIS WILL CONFIRM THAT LIMITS OF AIRBORNE RADIOACTIVE CONCENTRATIONS STATED
IN THE HEALTH PHYSICS MANUAL ARE ADJUSTED TO BE CONSISTENT WITH THE SPECIFIC
RADIONUCLIDES ENCOUNTERED.

EMERGENCY PROCEDURES

WE EXPECT TO SUBMIT AN EMERGENCY PROCEDURES MANUAL COMPLETE AS OUTLINED IN
YOUR LETTER BY JULY 1, 1965.

RESPECTFULLY YOURS,



L. J. SWALLOW,
QUALITY CONTROL MANAGER

LJS:JB
ENC.

cc: D. F. CRONIN - UNC NEW HAVEN