



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
612 EAST LAMAR BLVD, SUITE 400
ARLINGTON, TEXAS 76011-4125

June 14, 2012

Robert Compernelle, President
FMRI, Inc.
Number 10 Tantalum Place
Muskogee, Oklahoma 74403

SUBJECT: NRC INSPECTION REPORT 040-07580/12-001

Dear Mr. Compernelle:

This letter refers to the inspection conducted on May 16-18, 2012, at your facility located in Muskogee, Oklahoma. During this inspection, the NRC staff examined activities conducted under your license as they relate to public health and safety to confirm compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of activities, and interviews with personnel. The preliminary inspection results were presented to your onsite staff at the conclusion of the inspection. The enclosed report presents the results of this inspection.

During July 2011, the NRC staff identified one Unresolved Item involving your financial accounting of the proceeds from the sale of scrap material and equipment. An Unresolved Item is an issue of concern about which more information is required to determine if a performance deficiency exists, if the performance deficiency is more than minor, or if the issue of concern constitutes a violation. Specifically, the inspectors were unable to determine if you were required to report the sales of scrap metal and equipment to the NRC in accordance with License Condition 44. In addition, the inspectors were unable to determine if you are required to transfer these assets to the decommissioning trust fund as required by License Condition 10. Details about the Unresolved Item are documented in NRC Inspection Report 040-07580/11-001 dated September 1, 2011.

During this inspection, NRC staff reviewed your previous bankruptcy settlement agreements, license application submittals, and accounting records. The NRC staff concluded that you unintentionally reported the sales of scrap material incorrectly to the NRC. Your onsite staff is aware of the error and agreed to correctly report the sales of site assets to the NRC. Further, we determined that you do not have to transfer these proceeds to the decommissioning trust fund. Instead of the decommissioning trust fund, we noted that you have been transferring the proceeds to your bank account that is used for everyday transactions. Details of our analysis are provided in Section 1.2 of this Inspection Report. Accordingly, this Unresolved Item is closed.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response, if you choose to provide one, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response

should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

Should you have any questions concerning this inspection, please contact Mr. Robert Evans at (817) 200-1234 or the undersigned at (817) 200-1191.

Sincerely,

/RA/

D. Blair Spitzberg, PhD, Chief
Repository and Spent Fuel Safety Branch

Docket: 040-07580

License: SMB-911

Enclosure:

NRC Inspection Report 040-07580/12-001

cc w/enclosure:

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FINAL: R:\ DNMS

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ADAMS	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input checked="" type="checkbox"/> SUNSI Review Complete	Reviewer Initials: RJE
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E=E-mail

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**U.S. NUCLEAR REGULATORY COMMISSION
REGION IV**

Docket: 040-07580

License: SMB-911

Report: 040-07580/12-001

Licensee: FMRI, Inc.

Facility: Muskogee Plant

Location: Muskogee, Oklahoma

Date: May 16-18, 2012

Inspectors: Robert Evans, PE, CHP, Senior Health Physicist
Repository and Spent Fuel Safety Branch

Kenneth Kline, Project Manager
Office of Federal and State Materials and Environmental
Management Programs
Decommissioning and Uranium Recovery Licensing Directorate
Division of Waste Management and Environmental Protection
Special Projects Branch

Accompanied By: Bruce Watson, Chief
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Management Programs
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Division of Waste Management and Environmental Protection
Reactor Decommissioning Branch

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D. Blair Spitzberg, PhD, Chief
Repository and Spent Fuel Safety Branch

Approved By: D. Blair Spitzberg, PhD, Chief
Repository and Spent Fuel Safety Branch

Attachment: Monitoring Well MW-74 Sample Results
Supplemental Inspection Information

Enclosure

EXECUTIVE SUMMARY

FMRI, Inc.
NRC Inspection Report 040-07580/12-001

This inspection was a routine, announced inspection of decommissioning activities in progress at the FMRI facility in Muskogee, Oklahoma. In summary, the licensee was conducting decommissioning in accordance with license requirements.

Management Organization and Controls

- The licensee's staffing was being maintained in accordance with decommissioning plan requirements. The licensee implemented the radiation safety committee program in accordance with license requirements. An Unresolved Item related to accounting of asset sales was closed. The inspectors determined that the licensee did not have to transfer proceeds from the sale of scrap material to the decommissioning trust fund and the funds were being used to support site activities (Section 1.2).

Radiation Protection/Decommissioning Inspection Procedure

- The licensee implemented a radiation protection program during site decommissioning in compliance with 10 CFR Part 20 and the license. Occupational exposures were small fractions of the regulatory limits. The licensee was conducting surveys and sampling in accordance with license requirements. A previously cited violation involving minimum detectable activities of lapel air samplers was closed (Section 2.2).

Low-Level Radioactive Waste Storage/Inspection of Transportation Activities

- The licensee was storing and staging bagged work-in-progress (WIP) and other waste material in the onsite buildings and outdoor staging area in accordance with license requirements. No shipping operations were in progress during the inspection. The licensee was reconsidering its options for future shipments, and any changes will be reflected in an updated transportation plan (Section 3.2).

Environmental Protection

- The licensee conducted environmental monitoring in accordance with license requirements. No sample result exceeded the reporting limits specified in the license (Section 4.2).

REPORTS DETAILS

Summary of Site Status

At the time of the inspection, the licensee was in the standby mode. The licensee was previously conducting Phase 1 decommissioning in accordance with the NRC-approved Decommissioning Plan dated January 14, 2003. Phase 1 decommissioning includes removal of work-in-progress (WIP) residue material from Ponds 2 and 3 and transfer of this material to an out-of-state uranium mill for use as alternate feed material.

The licensee commenced with Phase 1 work during 2005. The licensee started by removing, bagging, and shipping WIP material from Pond 3. The licensee completed the removal of WIP material from Pond 3 during 2010. The licensee then reshaped the slopes of Pond 3 for erosion control. During 2011, the licensee removed and packaged all remaining Pond 3 material being stored in the onsite drying bed, and the licensee reshaped the drying bed for erosion control.

After an extended delay, the licensee resumed Phase I work on July 18, 2011. The initial work activities included bagging of wastes removed from Ponds 2 and 3. These bagged wastes included trash, debris, and liner material. The bags were placed inside a building for protection from the elements while in storage. The licensee plans to permanently dispose of these wastes at an out-of-state disposal facility at a later date.

The licensee started removing WIP material from Pond 2 on August 29, 2011. The licensee suspended this work during December 2011, pending restart of transportation activities. After the onsite inspection, the licensee notified the NRC that it would resume the excavation and bagging of Pond 2 material on or around July 9, 2012.

At the time of the inspection, the licensee was approximately 20-percent complete with this work activity. Material removed from Pond 2 was being stored in the Chem C building and the outdoor staging area. The licensee plans to resume shipping the bagged WIP material for use as alternate feed material at a uranium mill located in Utah later this year.

Since the last inspection, the licensee surveyed and free-released foundry material that was being stored in the Chem C building. The licensee also relocated some bagged WIP material from the outdoor staging area to the Chem C building. The licensee continued to survey, decontaminate, and free-release equipment from the boneyard and Chem A building. Further, the licensee continued to conduct routine monitoring and surveys in accordance with license requirements.

By letter dated June 21, 2011, the licensee requested NRC approval for consent for indirect change of control of the license from Fansteel to Green Lantern Acquisition 1. The licensee submitted a second letter dated June 21, 2011, requesting modification of the license to support the proposed change in ownership. The NRC staff submitted requests for information to the licensee, and the licensee responded to these requests.

During the onsite inspection, the NRC staff held a Category 1 public meeting with representatives of FMRI, Fansteel, and Green Lantern Acquisition-1 to discuss the licensee's outstanding application for indirect transfer of its license to Green Lantern Acquisition-1. At the time of this inspection, the NRC had not completed its review of these license amendment requests.

1 Management Organization and Controls (88005)

1.1 Inspection Scope

The inspectors reviewed the licensee's management organization and controls to ensure that the licensee was maintaining effective oversight of decommissioning activities.

1.2 Observations and Findings

a. Organizational Changes

The licensee's organizational requirements are provided in Figure 9-1 of the decommissioning plan. During February 2012, the licensee reassigned an individual to the position of radiation safety officer, replacing to previous radiation safety officer. Since this individual had previously filled the position, he was found to be qualified.

At the time of the inspection, site staffing consisted of the operations manager, two radiation technicians, one maintenance worker, one laborer, and the radiation safety officer. The licensee also had one part-time laborer and an onsite consultant. The operations manager was the highest ranking onsite individual, and the operations manager reported to the company president.

In summary, site staffing was in compliance with decommissioning plan requirements, and the licensee had enough staff to ensure compliance with routine monitoring and maintenance as required by the license.

b. Radiation Safety Committee

License Conditions 10 and 14 specify the requirements for the radiation safety committee. The goals of the committee are to ensure that employee exposures and effluent releases are as low as reasonably achievable and that the requirements of the license are being satisfied. The inspectors reviewed the licensee's implementation of the committee and interviewed committee members. The inspectors concluded that the committee met quarterly and discussed relevant topics. In addition, the annual radiation protection program review was conducted and reported to the committee for 2011. The inspectors concluded that the licensee had implemented its program for the radiation safety committee in accordance with license requirements.

c. (Closed) Unresolved Item 040-07580/1101-02: Reporting of surplus equipment sales to NRC and transfer of these monies to the standby trust.

During the July 2011 inspection, the NRC inspectors identified one Unresolved Item involving the licensee's accounting of scrap material and equipment sales. During the previous reporting year, the licensee sold scrap metal for the sum of \$4,000. The inspectors were unable to determine if the licensee was required to report the sale of scrap metal and equipment to the NRC in accordance with License Condition 44. In addition, the inspectors were unable to determine if the licensee was required to transfer these assets to the decommissioning trust fund as required by License Condition 10.

The inspectors reviewed the licensee's financial records during this inspection. The inspectors concluded that the licensee did not accurately account for the sale of these

assets. The licensee incorrectly combined rental income with asset sales, instead of reporting the sale of surplus equipment as a separate line item. (The licensee rents out warehouse space in buildings located in the former northwest property, an area that was previously free-released from the license.)

During the inspection, the licensee acknowledged the accounting error and indicated that it would report such proceeds separately under the sale of surplus equipment in the future. This finding was not safety significant because the licensee reported the sale but reported the sale incorrectly. The licensee's representative agreed to correct the accounting error and to ensure that future sales were reported accurately.

In addition, the inspectors questioned whether the licensee should have deposited the \$4,000 of proceeds into the decommissioning trust fund. The inspectors reviewed the licensee's records to determine where the licensee deposited the \$4,000 proceeds. The proceeds were deposited in FMRI's general bank account and not the decommissioning trust fund.

The inspectors reviewed the FMRI Promissory Note dated January 23, 2004, entered into by the licensee's parent company (Fansteel) to fund the decommissioning of the site. The inspectors determined that the \$4,000 in proceeds were not required to be deposited into the decommissioning trust fund. The promissory note only requires, other than the normal payments required by the promissory note, that Fansteel's excess cash be deposited into the decommissioning trust fund. The promissory note defines excess available cash as the change in fiscal year end cash from one period to the next less net increase for borrowings, sale proceeds, and capital expenditures below 5 percent of revenues.

As the proceeds were from FMRI's sale of scrap metal and not Fansteel's, the proceeds are not required to be deposited into the decommissioning trust fund. Instead, the licensee was transferring the funds to their bank account used for everyday transactions. For example, the income the licensee received from rental income was being deposited in this account. Also, payments for site services came out of this account. Further, Fansteel's excess available cash as defined in the promissory note is a negative number; therefore, a deposit for excess available cash is not required.

During the review of the licensee's accounting records and a random sampling of transactions for detailed review, the inspectors observed a number of other minor discrepancies that were pointed out to the licensee for correction.

1.3 Conclusions

The licensee's staffing was being maintained in accordance with decommissioning plan requirements. The licensee implemented the radiation safety committee program in accordance with license requirements. An Unresolved Item related to accounting of asset sales was closed. The inspectors determined that the licensee did not have to transfer proceeds from the sale of scrap material to the decommissioning trust fund and the funds were being used to support site activities.

2 Radiation Protection/Decommissioning Inspection Procedure (83822/87104)

2.1 Inspection Scope

The inspectors reviewed the licensee's implementation of its radiation protection and decommissioning programs to ensure compliance with 10 CFR Part 20 requirements and the license.

2.2 Observations and Findings

a. Occupational Exposures

The occupational radiation exposure monitoring requirements are specified in Section 10 of the Decommissioning Plan. At the time of the inspection, occupational exposure monitoring consisted of measurement of internal doses only. During 2008, the licensee suspended external personnel monitoring as allowed by 10 CFR 20.1502 based on historical results. The licensee continues to conduct routine ambient gamma radiation surveys to confirm that the general area dose rates remain low.

The licensee assigned internal exposures based on results obtained from lapel air samplers. During 2011, the licensee monitored seven individuals who conducted reclamation activities involving radioactive material. The licensee's records indicate that the highest total effective dose equivalent exposure was 0.008 rem with a regulatory limit of 5 rem. The highest total effective organ dose equivalent exposure was 0.052 rem with a regulatory limit of 50 rem. Assigned doses were well below regulatory limits. No bioassay samples have been collected and analyzed since 2007 due to the low levels indicated on these air sample results.

The licensee issued special work permits for non-routine work activities involving radioactive material. The inspectors reviewed the special work permits for 2011. The special work permits provided the safety precautions, personnel protective equipment, and monitoring requirements for the protection of site workers. At the time of the inspection, no new special work permits had been issued during 2012.

b. Routine Radiological Sampling and Surveys

The inspectors reviewed various records of radon sampling, equipment releases, and surface contamination surveys. Overall, the records indicate that the licensee was conducting the required surveys and sampling in accordance with license requirements. The records showed that all equipment free-released had contamination below the licensed limit. In addition, the results of the weekly, biweekly, and work clothing surface contamination surveys demonstrated that the licensee did not have wide-spread contamination problems. The inspectors verified that instruments used for these survey efforts were properly calibrated.

During the inspection, the inspectors identified and communicated to the appropriate licensee representatives several documentation weaknesses. These weaknesses included use of pencil for permanent records required under the license and inconsistent documentation of second level reviews for site records (including spreadsheets and original data collection records).

The inspectors reviewed the licensee's training program records. Training consisted of annual refresher training, new employee training, and offsite responder training. The licensee provided annual general employee training to site workers. A review of the licensee's files confirmed that new individuals completed general employee training at the appropriate level prior to starting work. However, the licensee was unable to provide all the training records for some employees. These missing records were for the employees who had worked at the site for several years. A licensee representative stated that it would locate or recreate the missing training records for these employees

- c. (Closed) VIO 040-07580/1102-01: Failure to achieve minimal detectable activity when using lapel air samplers

During the November 2011 inspection, the NRC inspectors identified a violation related to the licensee's inability to meet the minimal detectable activity limit specified in the license for lapel air samplers. The license attachment, Part B, provides the licensee's commitment for minimum detectable activity. However, due to the limited amount of airflow, the licensee's lapel air samplers are not able to detect uranium at the license-specified minimum detectable activity.

In response to this violation, by letter dated January 31, 2012, the licensee committed to calculate the air sampler minimum detectable activity in accordance with Regulatory Guide 8.25, "Air Sampling in the Workplace." This Regulatory Guide is referenced in the NRC-approved decommissioning plan. During the previous inspection, the inspectors confirmed that the licensee was meeting the minimum detectable activity as described in the Regulatory Guide. Since the licensee has committed to conduct the calculation in accordance with instructions provided in an NRC Regulatory Guide, this method was considered acceptable.

2.3 Conclusions

The licensee implemented a radiation protection program during site decommissioning in compliance with 10 CFR Part 20 and the license. Occupational exposures were small fractions of the regulatory limits. The licensee was conducting surveys and sampling in accordance with license requirements. A previously cited violation involving minimum detectable activities of lapel air samplers was closed.

3 **Low-Level Radioactive Waste Storage/Inspection of Transportation Activities (84900/86740)**

3.1 Inspection Scope

The inspectors conducted a review of the licensee's handling and storage of radioactive wastes to ensure compliance with license requirements.

3.2 Observations and Findings

At the time of the inspection, the licensee had 1690 bags of WIP material in storage. The WIP material came from Ponds 2 and 3 as well as the former drying bed. The bagged WIP material was being stored in the thermite building, Chem C building, and the outdoor staging area.

In addition to WIP material, the licensee had bagged debris (non-WIP material) in storage in the former wastewater treatment facility. The licensee continued to store contaminated soils in the sodium reduction building. This soil originated from previous reclamation work involving Ponds 1N, 1S, and 5. The licensee also continued to store about 7000 cubic yards of potentially contaminated soil recovered during construction of the intercept trench. This material was stored onsite under sheets of plastic. Finally, the licensee continued to store approximately 68,000 dry tons of calcium fluoride material in Ponds 8 and 9. These various materials will be relocated, packaged, shipped, transferred and/or disposed during future decommissioning activities.

The inspectors reviewed the licensee's staging of WIP material in the outdoor staging area. License Condition 25 provides the outdoor staging requirements. This license condition provides restrictions for number of lifts, cover material, base material, inspections, and storm water runoff. The inspectors compared the licensee's actual staging operations to the license requirements, and the inspectors concluded that the licensee was staging the WIP material in accordance with license requirements.

The licensee started using the outdoor staging area during mid-September 2011. As allowed by the license, the licensee can stage material at this location without an enhanced cover for up to one year. Prior to the one year deadline, the licensee will have to ship the material offsite, relocate the material to an onsite building, or install an improved cover system.

The inspectors toured the areas where the bagged WIP and waste material were being stored. The areas were controlled by the licensee with boundary markers and postings. The inspectors conducted radiological surveys of the bagged WIP material being staged and in storage using a Ludlum Model 2401-EC survey meter (NRC No. 21175G, calibration due date 10/28/12). The material measured up to about 0.75 millirems per hour on contact. The inspectors concluded that no area met the definition of a radiation area (5 millirems per hour).

At the time of the inspection, the licensee had excavated and shipped about 13,200 tons of WIP material from Pond 3. The licensee discontinued shipment operations during early 2009 due to the cost of transportation. At the time of the inspection, the licensee had not finalized its plans for shipment of the remaining WIP material. The licensee plans to ship all WIP material to a mill in Utah for use as alternate feed material, but the licensee has not finalized its future plans for how the material will be transported to the mill.

In addition, the licensee had not finalized its plans for shipment and disposal of all bagged wastes, including material removed from the vicinity of Ponds 2 and 3. This waste material consisted of trash, debris, plastic sheets, and soil-like material. The bagged waste material was being temporarily stored in the former wastewater treatment facility. After the licensee has determined where the waste material will be disposed, the licensee will then determine how it will ship the material to this disposal site.

The licensee has a transportation plan for the Phase 1 remediation project. The licensee plans to resume shipping operations during 2012. Once the licensee determines how it will ship WIP material to the out-of-state mill, and how it will ship the residual waste material to a disposal facility, then it will update the transportation plan accordingly. The inspectors will review this program area during a future inspection.

3.3 Conclusions

The licensee was storing and staging bagged WIP and waste material in the onsite buildings and outdoor staging area in accordance with license requirements. No shipping operations were in progress during the inspection. The licensee was reconsidering its options for future shipments, and any changes will be reflected in an updated transportation plan.

4 **Environmental Protection (88045)**

4.1 Inspection Scope

The inspectors reviewed the licensee's environmental monitoring program for compliance with regulatory and license requirements.

4.2 Observations and Findings

a. Liquid Effluents

The effluent control program requirements are provided in Section 11.2 of the Decommissioning Plan. The licensee used four outfalls for the discharge of water from the site. Plant waste water was discharged through Outfall 001. The other three outfalls (002, 003, and 005) were used for the discharge of storm water runoff.

The licensee occasionally released batches of liquids through Outfall 001. The licensee collected water samples prior to and during each release. The samples were analyzed for gross alpha and gross beta concentrations. These sample results were then compared to the licensed action levels. If either the gross alpha or the gross beta concentration exceeded the action level, then the licensee conducted an isotopic analysis to determine if the release was reportable.

The inspectors reviewed the licensee's water sampling records for 2011 and confirmed that the licensee was sampling and analyzing the liquid effluents as required by its National Pollutant Discharge Elimination System permit, with one minor exception. The licensee failed to conduct an isotopic analysis of one storm water sample that slightly exceeded the gross alpha action level. The licensee acknowledged the error as an oversight during the review of the laboratory sample results. Due to the low gross alpha activity level, the NRC inspectors concluded that the release would not have been reportable to the NRC. The licensee was considering its options for ensuring documentation of second-level reviews of site records.

The inspectors confirmed that the licensee was issuing condition reports for all gross alpha and gross beta concentration exceedances for a follow up review. The licensee reported the water sample results to the State of Oklahoma in accordance with permit requirements. In summary, none of the sample results exceeded the NRC reportability requirements.

b. Environmental Air Sampling

The licensee sampled airborne alpha radioactivity at six locations. The sample stations included four perimeter stations, one background station, and one offsite station. The

licensee continuously collected airborne particulates at these six locations and analyzed the samples weekly. The air sample filters were analyzed for gross alpha concentrations, and these concentrations were compared to the action level. Based on the licensee's 2011-2012 records, none of the sample results exceeded this administrative action level.

c. Groundwater Monitoring

The licensee sampled 19 monitoring wells and 4 sumps on a quarterly frequency. If the samples exceeded the gross alpha or gross beta action levels, then the licensee conducted an isotopic analysis of the samples. The inspectors reviewed the licensee's sample results for 2011-2012. The licensee collected all required samples, and conducted an isotopic analysis of all samples that exceeded the action levels. The inspectors concluded that no sample result exceeded the reporting level, therefore, the licensee was not required to report any sample result to the NRC.

Between 2006-2010, water samples collected from monitoring well MW-74 have exceeded the uranium concentration reporting level. This well is located down-gradient of Pond 3 but up-gradient of the intercept trench that runs parallel to the Arkansas River. The results for samples collected from MW-74 since March 2006 are provided in Attachment 1 to this inspection report.

The licensee previously concluded that subsurface contaminant disturbance caused by the reclamation of Pond 3 was the most likely reason for the elevated uranium concentrations in Monitoring Well MW-74. Phase I decommissioning commenced in June 2005, and a negative trend was first identified in the MW-74 samples during September 2005.

The reclamation of Pond 3 was completed during 2010. The sample results for 2011-2012 suggest that the uranium concentrations in the groundwater around MW-74 are trending downward. The licensee was unable to conduct an isotopic analysis of one sample result collected from MW-74 during September 2011 due to a laboratory reporting error. Regardless, the intercept trench still functions to collect potentially contaminated groundwater that may be migrating from Pond 3 towards the Arkansas River.

4.3 Conclusions

The licensee conducted environmental monitoring in accordance with license requirements. No sample result exceeded the reporting limits specified in the license.

5 Exit Meeting

The inspectors reviewed the scope and findings of the inspection during the exit meeting conducted at the conclusion of the onsite inspection on May 18, 2012. The licensee did not identify as proprietary any information provided to, or reviewed, by the inspectors with the exception of one financial record.

MONITORING WELL MW-74 SAMPLE RESULTS

(units of pCi/L)

Sample Date	Uranium-238	Uranium-235	Uranium-234	Reporting Level
March 15, 2006	5460	Not Detected	4740	3000
June 28, 2006	9040	Not Detected	8620	3000
July 14, 2006	3800	Not Detected	3360	3000
July 28, 2006	4100	Not Detected	4180	3000
August 10, 2006	8240	Not Detected	7890	3000
August 24, 2006	6080	Not Detected	5240	3000
September 20, 2006	11,300	Not Detected	10,300	3000
October 25, 2006	4610	83	4280	3000
November 15, 2006	9110	121	8320	3000
December 14, 2006	9660	24	8680	3000
March 23, 2007	8320	39	7160	3000
June 13, 2007	9070	299	8180	3000
September 12, 2007	6480	142	6280	3000
December 19, 2007	6740	70	6550	3000
March 26, 2008	1050	75	1050	3000
June 11, 2008	7840	157	7450	3000
September 24, 2008	9810	1220	9200	3000
December 17, 2008	11,400	82	10,900	3000
March 26, 2009	5730	462	5410	3000
June 25, 2009	11,400	286	10,500	3000
September 16, 2009	10,600	Not Detected	9600	3000
December 10, 2009*	10,000	500	10,000	3000
March 17, 2010	7550	50	6960	3000
June 10, 2010*	3138	141	3138	3000
September 30, 2010	4370	296	3970	3000
December 9, 2010*	2695	121	2695	3000
March 30, 2011	2730	40	2650	3000
June 23, 2011*	1884	85	1884	3000
September 14, 2011	not available	not available	not available	3000
December 14, 2011*	669	30	669	3000
March 2012	607	30	529	3000

*The licensee analyzed these samples for total uranium. The isotopic sample results are the licensee has prorated estimates based on the total uranium concentration sample results.

SUPPLEMENTAL INSPECTION INFORMATION

PARTIAL LIST OF PERSONS CONTACTED

Licensee

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G. Marshall, Consultant, Premium Environmental Services
R. Miller, Radiation Safety Officer, Omega Project Services
Curtis J. Zamec, President and Chief Executive Officer, Fansteel, Inc.

State of Oklahoma, Department of Environmental Quality

P. Dizikes, Attorney
J. Flynn, Environmental Engineer
L. McCaskill, Environmental Program Specialist
C. Parrott, Chief Engineer
K. Pham, Professional Engineer

INSPECTION PROCEDURES USED

IP 83822	Radiation Protection
IP 84900	Low-Level Radioactive Waste Storage
IP 86740	Inspection of Transportation Activities
IP 87104	Decommissioning Inspection Procedure for Materials Licensees
IP 88005	Management Organization and Controls
IP 88045	Environmental Protection

ITEMS OPENED, CLOSED, AND DISCUSSED

Open

None

Closed

040-07580/1101-02	URI	Reporting of surplus equipment sales to NRC and transfer of these monies to standby trust
040-07580/1102-01	VIO	Failure to achieve minimal detectable activity when using lapel air samplers

Discussed

None

LIST OF ACRONYMS AND ABBREVIATIONS USED

CFR	Code of Federal Regulations
IP	Inspection Procedure
URI	Unresolved Item
VIO	violation
WIP	work-in-progress