UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 E LAMAR BLVD
ARLINGTON, TX 76011-4511

April 30, 2015

Mr. Billy Ray, Site Manager
Rio Algom Mining LLC
P.O. Box 218
Grants, NM 87020

SUBJECT: NRC INSPECTION REPORT 040-08905/15-001

Dear Mr. Ray:

This refers to the inspection conducted on March 29-30, 2015, at your former Ambrosia Lake facility in McKinley County, New Mexico. This inspection was an examination of activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. Specifically, the NRC evaluated the demolition and removal of the water treatment and the ion exchange buildings.

Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of activities, and interviews with personnel. The inspection findings were discussed with you and your staff at the conclusion of the onsite inspection. The enclosed report presents the results of this inspection. Based on the results of this inspection, the NRC has determined that no violations of NRC requirements were identified. No response to this letter is required.

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 Agency wide Documents Access Management System (ADAMS), accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html.

Should you have any questions concerning this inspection, please contact Mr. Rick Muñoz, Health Physicist, at 817-200-1220 or the undersigned at 817-200-1191.

Sincerely,

/RA/

Ray L. Kellar, P.E., Chief
Repository and Spent Fuel Safety Branch
Division of Nuclear Materials Safety

Docket: 040-08905
License: SUA-1473

Enclosure:
Inspection Report 040-08905/15-001

cc: Michael Ortiz, Chief
New Mexico Environment Department
Radiation Control Bureau
P.O. Box 5469
Santa Fe, NM 87502-5469

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X SUNSI Review By: RRM		ADAMS **X** Yes ☐ No	**X** Publicly Available ☐ Non-Publicly Available		**X** Non-Sensitive ☐ Sensitive		Keyword:
OFFICE	DNMS/NMIB	RFSF/BC:					
NAME	RRMunoz	RLKellar					
SIGNATURE	***/RA/***	***/RA/***					
DATE	04/28/2015	04/30/2015					

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U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket:	040-08905
License:	SUA-1473
Report:	040-08905/15-001
Licensee:	Rio Algom Mining LLC
Location:	McKinley County, New Mexico
Date:	March 29-30, 2015
Inspector:	Rick Muñoz, Health Physicist Nuclear Materials Inspection Branch Division of Nuclear Material's Safety
Approved by:	Ray L. Kellar, P.E., Chief Repository and Spent Fuel Safety Branch Division of Nuclear Material's Safety
Attachment:	Supplemental Inspection Information

EXECUTIVE SUMMARY

Rio Algom Mining LLC
NRC Inspection Report 040-08905/15-001

This inspection was a special, announced inspection of decommissioning activities of the water treatment facility and ion exchange building being conducted at the former Rio Algom Mining, LLC, mill in McKinley County, New Mexico. In summary, the licensee was conducting reclamation activities in accordance with license requirements.

Management Organization and Controls

- At the time of the inspection, the licensee had sufficient staff for the reclamation activities in progress. (Section 1.2)

- The licensee had implemented an effective demolition work plan for the removal and disposal of the water treatment facility and the ion exchange building. (Section 1.2)

- During the July 2013 inspection (ML13361A121), a violation was identified involving the licensee's failure to designate a qualified individual to the position of radiation safety officer between early February and late April 2013. On March 29, 2015, the NRC inspector verified that the radiation safety officer (RSO), assigned since April 25, 2013, possessed the minimum qualifications as specified in Section 2.4.1 of Regulatory Guide 8.31. The violation involving the licensee's failure to designate a qualified individual to the position of RSO between early February and late April 2013 was closed. (Section 1.2)

- The failure to have a qualified radiation safety officer resulted in violations related to several late inspections, reviews, and reports. Open violations cited and unresolved items identified during the July 2013 inspection will remain open until the next scheduled inspection. (Section 1.2)

Radiation Protection/Operator Training

- The licensee's implementation and performance of the water treatment facility and ion exchange building work plan ensured safety and compliance with license conditions and regulatory requirements. The licensee and its contractors complied with the commitments of the work plan. Equipment calibrations and training were up to date, and no contamination problems were identified. (Section 2.2)

Personnel Exposure and Environmental Protection

- The licensee collected air particulate samples at two locations, upwind and downwind, during this specific demolition activity. Sample results were negligible. Monitoring equipment was well maintained and appropriately calibrated. (Section 3.2)

Radioactive Waste Management

- The licensee managed and disposed of construction and radioactive wastes in accordance with license requirements. (Section 4.2)

Report Details

Summary of Plant Status

The Ambrosia Lake mill processed approximately 33 million tons of uranium ore from 1958-1985. Reclamation of the tailings cells commenced in 1989, and the mill was demolished in 2003-2004.

During the July 2013 inspection, remaining site structures included the machine shop, water treatment facility, ion exchange building, security building, and site offices. The licensee previously demolished structures of various sizes. These structures included the water tower, block house, scale house, pump house, as well as the decontamination wash pad. The material was disposed in either the Tailings Pond 2 disposal cell or Disposal Area 2.

Since the last inspection, the licensee has cleaned the areas with elevated readings in Ponds #4, #5, and #6 in the interior channel which totaled approximately 200,000 yards of soils. Approximately 150,000 yards of radium impacted soils were removed from the mill pond. The alternate disposal cell was filled during the summer of 2014, which included the radon barrier and rock protector. The licensee completed the demolition of the remaining structures in the mill yard except for two 500,000 gallon tanks and contaminated soils totaling approximately 200,000 yards. The dam in the mill pond was completely removed. Minor surface re-grading in Pond #7 and #8 was completed which involved the replacement of eroded soils and the placement of approximately 3 inches of 1 inch rock. The construction of the diversion channel on the south side of Pond No. 7 and No. 8 has been completed. The original borrow area for the radon cover has been reclaimed. The licensee has completed the construction of the interior channel. The elevated reading areas from Section 4 have been removed including the reclamation of the road from Section 4. The elevated water tower was removed in late 2014. The bridge over Highway 509 was removed and cut into workable sections during March of 2015. All that remains of the bridge is the removal of two eight by three foot footings on either side of the road currently scheduled for removal in late spring of 2015.

The licensee plans to scan the inside of the mill yard and conduct free release surveys of the equipment fleet including 45 pieces of equipment (heavy, light vehicles, trucks), during the summer of 2015. A lay down decontamination concrete pad was constructed in February 2015 to contain the materials. The pad is planned to be surveyed and removed once all equipment is free-released in 2015.

At the time of this inspection, site reclamation activities were in progress. The work in-progress specifically focused on the demolition, waste removal, and disposal of the water treatment facility (WTF) and the ion exchange building (IXB). The WTF and IXB material including resins were disposed on-site in Tailings Pond 2 disposal cell. The licensee continued to use soil from two nearby borrow pits as radon barrier material. General fill material was obtained from the borrow area located on the south-east side of the property. Overburden was obtained from the new clay borrow area located south of Pond 2. Some of these soils were being used as cover material over the disposal cell.

1 Management Organization and Controls (88005)

1.1 Inspection Scope

The inspector reviewed the licensee's oversight and control of licensed activities related to the demolition, debris removal, and disposal of all wastes associated with the removal of the WTF and IXB.

1.2 Observations and Findings

At the time of the inspection, site staffing consisted of a combination of Rio Algom Mining, LLC (RAML) licensee staff and contractors. The highest ranking official was the site manager, however neither the site manager nor the project manager were required to be present at the site on a daily basis. Instead, the deputy site manager was responsible for providing oversight of the day-to-day activities. Other licensee staff assigned to the site includes one radiation protection technician acting as the alternate RSO, reclamation engineer, and maintenance technician.

During the inspection, three contractors were onsite: Conestoga-Rovers & Associates (CRA); BPH-Billiton (BPH); and Solutient Technologies, LLC (STL). RAML contracted the services of CRA for the construction and demolition activities. BPH was contracted for management and coordination of the decommissioning and construction activities. CRA sub-contracted STL for health physics support. The site superintendent and construction engineer provided oversight of the contractor work force. The positions of RSO and alternate RSO were being filled by STL. Since the RSO contractor was not on-site daily, he delegated the health physics responsibilities to an assistant RSO by letter dated July 12, 2013. In addition to the site assistant RSO, the RSO assigned two health physics (HP) technicians to assist in contamination control, access control, and egress surveys of personnel and equipment under the WTF and IXB demolition work plan. A security force was present at all times to control and record all individuals entering the property. At the time of the inspection, the licensee had sufficient staff for the work in progress.

License Condition 11 specifies that the licensee shall designate an RSO who will be responsible for the establishment and maintenance of a facility radiation protection program including the personnel monitoring and environmental monitoring programs. The RSO is also required to possess minimum qualifications as specified in Section 2.4.1 of Regulatory Guide 8.31, "Information Relevant to Ensuring That Occupational Radiation Exposures at Uranium Recovery Facilities Will Be As Low As Is Reasonably Achievable." The previous RSO left the company in early February 2013. The licensee did not fill the position until April 25, 2013, in part, because the search for a replacement RSO took longer than the licensee had anticipated. In the interim, the licensee did not designate an RSO and the duties of the RSO were reassigned to various staff including the radiation protection technicians. The licensee's failure to designate an RSO between early February 2013 and April 25, 2013, was a violation of License Condition 11 (040-08905/1301-01). The licensee's failure to designate an individual as RSO was significant because a number of license requirements were not met during the time frame that the position remained open. This failure included late reports and missed site inspections resulting in additional cited violations and unresolved items.

To correct the violation for failure to designate a qualified RSO responsible for the establishment and maintenance of the facility radiation protection program, the licensee

submitted a courtesy notification indicating they now had a qualified radiation safety. On March 29, 2015, the NRC verified that the individual designated as RSO since April 25, 2013, who was assigned with the establishment and maintenance of the facility's radiation protection program possessed the minimum qualifications as specified in Section 2.4.1 of Regulatory Guide 8.31. Accordingly, violation 040-08906/1301-01 is closed. The remaining violations and NRC unresolved items, identified during the July 2013 inspection, will be reviewed during the next scheduled NRC inspection.

1.3 Conclusions

At the time of the inspection, the licensee had sufficient staff for the reclamation activities in progress. A previously cited violation involving the licensee's failure to designate a qualified individual to the position of RSO between early February and late April 2013 was closed. The failure to have a qualified RSO resulted in additional violations related to several late inspections, reviews, and reports. These violations will remain open until the next scheduled inspection.

2 Radiation Protection/Training (83822/88010)

2.1 Inspection Scope

The inspector reviewed the licensee's implementation of its radiation protection program relative to the demolition, removal, and disposal of materials from the WTF and IXB to verify compliance with NRC regulations and license requirements.

2.2 Observations and Findings

License Condition 14 states that written standard operating procedures shall be established, and the procedures shall be reviewed annually. The licensee's records indicated that site procedures had been established and were reviewed by the new RSO. In addition, the licensee maintained radiation detecting instrumentation for use during routine surveys and scans. The licensee established and maintained a program to ensure that instruments were being calibration checked as required by the license.

CRA developed a specific WTF and IXB Demolition Work Plan for BPH. The plan was reviewed and enhanced by the RSO before final approval by RAML. The work plan established radiation health and safety operating procedures. The work plan included Radiation Work Permits to address the transite/asbestos abatement (RA-2015-04-01) and the demolition and resin bead removal (RA-2015-05-01) of the WTF and IXB. Both work permits were opened on February 10, 2015, and were closed December 31, 2015. Demolition, removal, and disposal activities related to the asbestos and transite abatement evolution began on February 10, and was completed on March 7, 2015. The WTF and the IXB location was demarcated with an exclusion zone, contamination reduction zone, personnel contamination reduction ingress-egress corridor, equipment route ingress-egress area, and an HP support zone.

The inspector's discussions with management verified that assessments had been made by the licensee to assess which activities and at which locations the most exposures are being received, what groups of workers are receiving the highest exposures, what discussions they have had with the HP staff, and what steps have been taken to reduce exposures during the WTF and IBX removal evolution. Interviews with affected personnel verified what had been done to reduce exposures. The work plan called for

intermittent watering of the resins within the IX column tanks while they were being sheared. The runoff liquids and resin beads were to be contained within Sump No. 1 and Sump No. 2 of the IXB. The excavation shear operator was also instructed to dip any tank or column section sheared into the sump liquid if there was any indication of residual resin beads remaining on the cut piece of material.

License Condition 10 provides the training requirements. The licensee conducted various types of training including visitor orientation, initial site training, on-the-job training, and job safety analysis (JSA) work sheets requiring sign offs on a daily basis. The JSA sheets were reviewed and discussed during each morning safety tail-gate briefing.

During the inspection, the licensee's contractor was conducting work using both the licensee's and some of its own radiation protection program standard operating procedures. All were tied into the WTF and IXB Demolition Work Plan. The procedures had been reviewed by the licensee's staff. The inspector reviewed the contractor's radiation protection program and discussed the program results with the RSO and HP staff. The contractor conducted initial radiation protection training at the end of February 2014, before demolition work started on the WTF and IXB on March 23, 2015.

The contractor conducted exposure monitoring, bioassay sampling, breathing zone air sampling (lapel monitors), high-volume general area air sampling, vehicle and equipment surveys, personnel surveys, and area surveys to support the work in progress. The contractor also issued radiation work permits for special work activities. According to the contractor representatives, none of the various radiological sample results were indicative of radiological problems. The inspector will review the results of the contractor's occupational exposure monitoring during a future inspection. Finally, the licensee's contractor conducted daily safety meetings (tail gate sessions) to ensure that site workers were made aware of the safety hazards that could be encountered during construction work activities.

Portable radiological survey instruments and equipment were examined to verify operability, response, and proper settings. All instruments and equipment in use were properly calibrated. The calibration and surveillance program for these instruments are being accomplished in accordance with license requirements or licensee procedures.

Before any demolition began, the work plan called for a complete power washing of the WTF and IXB. The work permit required workers to wear respiratory protection equipment certified by NIOSH/MSHA. Discussion with workers indicated that a maintenance and training program was conducted and that it was administered and conducted in accordance with written procedures. Records indicated that respirator users were individually fitted for respirators and that respiratory equipment was operationally tested immediately prior to each use. After the power washing of the WTF and IXB, only the movable thumb excavator and the shear excavator operators were required to wear lapel air samplers to monitor for potential airborne contamination. The results of this monitoring will be reviewed during the next scheduled inspection.

The exclusion zone areas and temporary work areas were adequately posted with "Caution Radioactive Materials" postings. Although there were no radiation areas noted access was strictly controlled in accordance with site procedures. Access in and out of the disposal cell was also strictly controlled, including the requirement escorts for any individual not specifically authorized.

The licensee established required surveys of personnel and specified work areas in each of the contractor's mobile trailers. These personnel surveys are required of all employees working at the site before leaving the site. The surveys are conducted using approved procedures. The inspector reviewed a random sample of survey records to verify that they are routinely reviewed by HP staff and any corrective actions are taken, as appropriate. The inspector observed surveys in progress by licensee personnel. Surveyors appeared to have proper training and knowledge in checking the survey instrument for proper operation with a dedicated check source and in the use of the instrument for conducting radiation surveys. Procedural requirements for surveys appear adequate to demonstrate compliance with the regulations and with pertinent license requirements.

To monitor for worker exposures to radioactive material, the licensee conducted external exposure monitoring and internal exposure monitoring via bioassay sampling. The work plan called for the HP staff to wear an additional whole body badge (optically stimulated luminescent) dosimeters to monitor exposures during the WTF and IXB removal. The licensee's records of exposures during this evolution will be evaluated during the next scheduled inspection to verify that occupational exposures remained below the annual regulatory limit of 5 Rem.

The licensee collected baseline bioassay samples from seven site workers before initiating the WTF/IXB work plan. Bioassays will be collected once the final removal of Sump No. 1 and Sump No. 2 evolutions are completed. Sample results of the bioassay program will be reviewed during the next scheduled inspection.

The HP technicians responsible for oversight of the work assisted the equipment operators, which included: the water cannon operator, excavator with shear operator; excavator with movable thumb operator; haul truck driver; and the man lift operator; in conducting and documenting personnel radiological surveys when leaving the personnel egress station from the exclusion zone. No documented survey result exceeded the action limit. In addition, the HP technicians conducted vehicle surveys of the haul truck at the second equipment egress location from the exclusion zone. On occasion, a clump of contaminated soil was detected. Before the equipment was allowed to leave the exclusion zone, HP staff verified that no removable contamination remained. All survey results were less than the action levels. These various survey results indicate that the site did not have contamination problems.

The inspector walked down the licensee's radioactive material use and disposal locations to verify that public dose limits were not exceeded. The inspector used a Ludlum Model 19, serial number 16337 (36543), calibration due July 21, 2015. The highest ambient gamma radiation measurements were recorded at the boundary of the exclusion zone in close proximity and adjacent to one of the IX columns. The highest reading measured was 3,500 µR/hour. The inspector's survey results were similar to the licensee's survey results, indicating that no area required posting as a radiation area.

2.3 Conclusions

The licensee's implementation and performance of the WTF/IXB Work Plan ensured safety and compliance with license conditions and regulatory requirements. The licensee and its contractors complied with the commitments of the work plan.

Equipment calibrations and training were up to date, and no contamination problems were identified.

3 Personnel Exposure and Environmental Protection (88045)

3.1 Inspection Scope

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

3.2 Observations and Findings

Environmental Monitoring

To monitor for internal exposures, the licensee collected air particulate samples at two locations, upwind and downwind, during this specific demolition activity for radon progeny and uranium dust concentrations. The air samplers operated continuously, and the filters were exchanged daily. The inspector interviewed the individual who collected the sample filters. The filters were analyzed daily for natural uranium, thorium-230, radium-226, and lead-210 concentrations. All sample results indicated that the uranium dust concentrations were less than 1-percent of the licensed limit. The air sample results were negligible respective to the limits. The inspector confirmed that the licensee routinely calibrated the air samplers as stipulated by License Conditions 10 and 16. The inspector confirmed that the licensee's demolition activities did not have an impact on public doses

3.3 Conclusions

Environmental air monitoring samples were collected. Sample results were negligible. Monitoring equipment was well maintained and appropriately calibrated.

4 Radioactive Waste Processing, Handling, Storage, and Transportation (88035)

4.1 Inspection Scope

The inspector observed the demolition activities of the WTF and the IXB, interviewed licensee representatives, toured the site, and reviewed applicable records to determine if the licensee had established and maintained an effective program for managing radioactive wastes.

4.2 Observations and Findings

License Condition 32 states that the licensee is authorized to dispose of and bury contaminated waste materials resulting from past and current operations into designated disposal areas. The inspector reviewed the licensee's control of debris and radioactive wastes resulting from the IXB demolition activities.

At the time of the inspection, Disposal Cell 2 remained open. This cell was being used for disposal of the remaining structural debris and contaminated soils. Additionally Tailings Pond 2, and part of Disposal Cell 2, also remained open for disposal of contaminated soil and liquids resulting from the WTF and IX building demolition from Sump No. 1 and Sump No. 2. The liquids were pumped directly from the sumps via a 4-

inch line directly to berm area located 50 feet up, east of center, and at the top of Disposal Cell 2. The liquids were placed in the berm lay down area to allow for evaporation before covering with soil.

License Condition 42 allows the licensee to consolidate and transport Section 4 evaporation pond sediments, while License Condition 37 allows the licensee to dispose of the pond sediments in Tailings Cell 2. Section 4 is the area where the licensee previously constructed and operated 11 evaporation ponds. The NRC conducted a confirmatory survey of this area in September 2009. The results of the confirmatory survey were submitted to the licensee by report dated February 12, 2010 (ML100560099). The 2009 survey results suggest that additional remediation was necessary before the area could be free-released for unrestricted use. Several areas located within Section 4 contained contamination that exceeded the release limits for thorium-230.

The licensee removed approximately 70,000 yards of additional soils from Section 4. The licensee informed the inspector that the Section 4 area was recently resurveyed for residual radiological source term material. The data had been reviewed by licensee representatives and determined that all removable soil contamination had been removed. The Section 4 soil material was disposed in the Tailings Pond 2 disposal cell during 2014. NRC will consider the need for another confirmatory survey of the area because the licensee intends to free-release the Section 4 area for unrestricted use.

License Condition 13 allows the licensee to operate mine water uranium recovery treatment facilities as part of the groundwater corrective action program. The license requires the licensee to submit an annual report of the ion exchange units in operation. The most recent report was submitted to the NRC by letter dated December 5, 2012. In this annual report, the licensee notified the NRC that no columns were being used for mine water treatment. The inspector verified that the licensee had not conducted mine water treatment using the ion exchange columns since the last inspection.

The licensee has not transported any radioactive material over public highways since the last inspection; therefore, this program area was not reviewed. Also, License Condition 41 allows the licensee to dispose of waste material from other sites, but the licensee stated that it had not received wastes from other licensees since the last inspection.

4.3 Conclusions

The licensee managed the disposal of radioactive wastes in accordance with approved NRC license requirements.

5 Exit Meeting

The inspector reviewed the inspection findings during an exit meeting conducted at the conclusion of the onsite inspection on March 30, 2015. During the inspection, the licensee did not identify any information reviewed by the inspector as proprietary.

SUPPLEMENTAL INSPECTION INFORMATION

PARTIAL LIST OF PERSONS CONTACTED

Rio Algom Mining (RAML)

A. Baus, Site Manager, RAML
D. Murray, Deputy Site Manager, RAML
T. Ballaine, Superintendent, RAML
B. Ray, Manager of Projects (bhpBulliton)
B. Squibb, Radiation Safety Officer (Solutient Technologies, LLC)
L. Collins, Assistant Radiation Safety Officer (Solutient Technologies, LLC)
G. Alexander, Health Physics Technician (Solutient Technologies, LLC)
L. Squibb, Health Physics Technician (Solutient Technologies, LLC)
M. Moran, Construction Engineer (Conestoga-Rovers & Associates)
R. Powell, Engineer (bhp Bulliton)
S. Corning, (bhpBulliton)

INSPECTION PROCEDURES USED

IP 88005	Management Organization and Controls
IP 83822	Radiation Protection
IP 88010	Training
IP 88035	Radioactive Waste Processing, Handling, Storage, and Transportation

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None

Closed

040-08905/1301-01	VIO	Failure to assign qualified individual to position of RSO

Discussed

040-08905/1301-01	VIO	Failure to assign qualified individual to position of RSO
040-08905/1301-02	VIO	Failure to conduct weekly site inspections
040-08905/1301-03	VIO	Failure to submit semi-annual report to NRC
040-08905/1301-04	URI	Calculation of public dose assessment
040-08905/1301-05	URI	Lower limits of detection for soil, sediment, vegetation samples
040-08905/1301-06	VIO	Failure to submit quarterly groundwater report to NRC

LIST OF ACRONYMS

ADAMS	Agencywide Documents Access and Management System
ALARA	As Low As Reasonably Achievable
BHP	bhp-Billiton
CFR	Code of Federal Regulations
CRA	Conestoga-Rovers & Associates
HP	Health Physics
IP	Inspection Procedure
IXB	Ion Exchange Building
NRC	U.S. Nuclear Regulatory Commission
JSA	Job Safety Analysis
RAML	Rio Algom Mining, LLC
RSO	Radiation Safety Officer
URI	Unresolved Item
VIO	Violation
WTF	Waste Water Treatment Facility