



Kennecott Uranium Company
Sweetwater Uranium Project
Post Office Box 1500
Rawlins, Wyoming 82301-1500
Phone: (307) 328-1476
Fax: (307) 324-4925

28 July 2005

Mr. Gary Janosko, Chief
c/o Document Control Desk
Fuel Cycle Facilities Branch - Division of FCSS
Office of Nuclear Material Safety and Safeguards
Mail Stop T-8A33
11545 Rockville Pike
Rockville, MD 20852-2738

Dear Mr. Janosko:

**SUBJECT: Sweetwater Uranium Project - Docket Number 40-8584
Source Materials License SUA-1350 - Semiannual 10 CFR 40.65 Report
Airborne Effluents**

Enclosed is Kennecott Uranium Company's Semiannual 10 CFR 40.65 Report for the first half of 2005 for airborne effluents. This report addresses the requirements of License Condition 11.5 of SML #SUA-1350, as well as the requirements of 10 CFR 40.65(a)(1).

Kennecott Uranium Company is only required to monitor for ambient gamma and airborne particulates at the downwind location (Air 4A) and radon at the upwind (Air 2) and downwind (Air 4A) locations as long as operations remain suspended as per License Condition 11.5. Kennecott is not required to perform stack, soil, sediment or vegetation sampling as long as operations remain suspended.

An error in a date on the 2004 RadTrak Radon Monitor sheet submitted on February 15, 2005 was discovered. A corrected page is being included with this report.

Kennecott Uranium Company has examined the data included in this report, calculated the dose to the nearest resident in millirems per year for the first half of 2005 from the licensed activities and concluded that the dose does not exceed the 100 mrem per year dose limit. A copy of the calculation sheet as well as an explanation of the calculation method is included. This is being done at the request of Elaine Brummett, previously of your staff, in an email dated September 7, 2001.

Should you have any questions, please contact me at (307) 328-1476.

Sincerely yours,

A handwritten signature in cursive script that reads 'Oscar A. Paulson'.

Oscar Paulson
Facility Supervisor

cc: Stephen J. Cohen, Project Manager
Director - USNRC DRSS, Region IV (w/o enc.)
Roger Strid - KEC

**KENNECOTT URANIUM COMPANY
SWEETWATER URANIUM PROJECT
Source Material License SUA-1350**

**2004 – R E V I S E D
RadTrak Radon Monitor
(pCi/L)**

DATE	LOCATION	RADIONUCLIDE	CONCENTRATION	STD DEVIATION/ STD COUNTING ERROR	LOWER LIMIT OF DETECTION (LLD)	
				%	pCi/L-Days	pCi/L
1/1/04 – 4/1/04	Downwind - Air 4A	Radon	2.7 pCi/L	8.2	6.0	0.06
1/1/04 – 4/1/04	Upwind - Air 2	Radon	2.7 pCi/L	8.2	6.0	0.06
4/1/04 – 6/30/04	Downwind - Air 4A	Radon	1.7 pCi/L	10.4	6.0	0.06
4/1/04 – 6/30/04	Upwind - Air 2	Radon	2.4 pCi/L	9.0	6.0	0.06
6/30/04 – 10/3/04	Downwind - Air 4A	Radon	3.1 pCi/L	7.7	6.0	0.06
6/30/04 – 10/3/04	Upwind - Air 2	Radon	3.6 pCi/L	7.2	6.0	0.06
10/3/04 – 1/01/05	Downwind - Air 4A	Radon	2.8 pCi/L	7.9	6.0	0.06
10/3/04 – 1/01/05	Upwind - Air 2	Radon	3.9 pCi/L	6.7	6.0	0.06

**KENNECOTT URANIUM COMPANY
SWEETWATER URANIUM PROJECT
Source Material License SUA-1350**

**2005
RadTrak Radon Monitor
(pCi/L)**

DATE	LOCATION	RADIONUCLIDE	CONCENTRATION	STD DEVIATION/ STD COUNTING ERROR	LOWER LIMIT OF DETECTION (LLD)	
				%	pCi/L-Days	pCi/L
1/1/05 – 4/4/05	Downwind - Air 4A	Radon	1.8 pCi/L	9.2	6.0	0.06
1/1/05 – 4/4/05	Upwind - Air 2	Radon	2.3 pCi/L	8.3	6.0	0.06
4/4/05 – 7/3/05	Downwind - Air 4A	Radon	1.5 pCi/L	5.4	6.0	0.06
4/4/05 – 7/3/05	Upwind - Air 2	Radon	2.6 pCi/L	4.7	6.0	0.06
	Downwind - Air 4A Upwind - Air 2	Radon Radon				
	Downwind - Air 4A Upwind - Air 2	Radon Radon				

**KENNECOTT URANIUM COMPANY
SWEETWATER URANIUM PROJECT
Source Material License SUA-1350**

**2005
DIRECT RADIATION MEASUREMENTS
(TLD)**

Location	Date	Exposure Rate (mr/Qtr)	Error Estimated	Lower Limit of Detection (LLD) Millirems
TLD 0000 - Control 0004 - Air 4A	1/1/05 – 4/4/05 1/1/05 – 4/4/05	36 51	0.5 mr 0.9 mr	10 ¹ 10 ¹
TLD 0000 - Control 0004 - Air 4A	4/4/05 – 7/3/05 4/4/05 – 7/3/05	26 40	2.9 mr 4.5 mr	10 ¹ 10 ¹
TLD 0000 - Control 0004 - Air 4A				
TLD 0000 - Control 0004 - Air 4A				

¹ Please see the following copy of a letter from ThermoNUtech on Lower Limits of Detection (LLDs).

**KENNECOTT URANIUM COMPANY
SWEETWATER URANIUM PROJECT
Source Material License SUA-1350**

CONTINUOUS LOW-VOLUME AIR PARTICULATE ANALYSIS

STATION 4A – 2005

Quarter/Date Sampled Air Volume	Radionuclide	Concentration μCi/ml	Error Estimate μCi/ml	LLD μCi/ml	Effluent Conc.* pCi/ml	% Effluent Concentration
1st Quarter 1/1/05 – 4/4/05 Air Vol in mLs 4.38 E+10	U-nat	<1.00 E-16	N/A	1.00 E-16	9.00 E-14	<1.11 E-01
	Th-230	<1.00 E-16	N/A	1.00 E-16	3.00 E-14	<3.33 E-01
	Ra-226	1.11 E-16	3.25 E-17	1.00 E-16	9.00 E-13	1.23 E-02
	Pb-210	1.61 E-14	3.25 E-16	2.00 E-15	6.00 E-13	2.68 E+00
2nd Quarter 4/4/05–7/3/05 Air Vol in mLs 4.39 E+10	U-nat	2.16 E-16	N/A	1.00 E-16	9.00 E-14	2.40 E-01
	Th-230	1.15 E-16	2.59 E-17	1.00 E-16	3.00 E-14	3.82 E-01
	Ra-226	1.95 E-16	7.78 E-17	1.00 E-16	9.00 E-13	2.16 E-02
	Pb-210	1.38 E-14	3.33 E-16	2.00 E-15	6.00 E-13	2.30 E-00
3rd Quarter Air Vol in mLs	U-nat					
	Th-230					
	Ra-226					
	Pb-210					
4th Quarter Air Vol in mLs	U-nat					
	Th-230					
	Ra-226					
	Pb-210					

LLD's are as published in Reg. Guide 4.14

*Effluent Concentration from the NEW 10 CFR Part 20 - Appendix B - Table 2

Year for Natural Uranium

Year for Thorium-230

Week for Radium-226

Day for Lead-210

Memorandum

Oscar Paulson
Facility Supervisor

27 July 2005

To: File - 10 CFR 40.65 Report

From: Oscar Paulson

Subject: Dose to the General Public in Millirems per Year as Represented by the Nearest Resident – First Half 2005

The following is a dose calculation for the nearest resident (the contract security guard) for the first half of 2005.

Calculation Assumptions:

1. The nearest resident for dose calculation purposes is considered to be the site security officer when he is not on duty and sleeping inside the Security Trailer. The site security officer is scheduled to be on site from 5:30 p.m. on Thursday of each week to 10:00 p.m. the following Sunday, on holidays and at times that the Senior Facility Technician is on vacation. In spite of the fact that the site security officer does not reside on site continuously, no occupancy factor is assigned to him and for dose calculation purposes he is assumed to reside on site continuously.
2. Radon concentrations are measured in the Security Trailer with Radtrak detectors placed in the kitchen and bedroom and changed quarterly. The results from these detectors are averaged to derive a semiannual radon concentration in Pico curies per liter for the Security Trailer.
3. Radon exposures in working levels are measured semiannually in the Security Trailer using a calibrated Bendix BDX-44, MSA or Sensidyne GilAir II air pump and filter. The filter is read by the modified Kusnetz Method.
4. The radon concentration and exposure are used to calculate the equilibrium factor. The equilibrium factors calculated semiannually are averaged to derive a site equilibrium factor.
5. This equilibrium factor is applied to the upwind radon concentrations to derive a background radon dose and to the average semiannual radon concentration in the Security Trailer to derive a radon dose to the nearest resident. An equilibrium factor table is attached.
6. The dose from the semiannual downwind airborne particulate concentrations of natural uranium, radium-226 and thorium-230 are used to calculate the dose from airborne particulates in the Security Trailer in spite of the fact that the Security Trailer is not downwind of the facility.
7. The gamma dose from the downwind gamma radiation monitor (environmental thermo- luminescent dosimeter) is used to calculate the gamma radiation dose in the Security Trailer.
8. The doses from radon-222, airborne particulate radionuclides and gamma radiation are summed to produce a dose to the nearest resident (the Security Trailer).

9. The radon concentrations measured at the upwind air monitoring stations during the two (2) quarters for a given semiannual period are averaged, corrected for the site equilibrium factor and converted to a background radon dose for the facility.
10. This background radon dose is summed with the background gamma radiation dose (from the revised Environmental Report – dated August 1994) and the doses derived from the background airborne particulate concentrations (natural uranium, radium-226 and thorium-230 as described in the revised Environmental Report dated August 1994) to yield a background radiation dose for the facility for the given semiannual period.
11. The background dose is subtracted from the calculated dose to the nearest resident (Security Trailer) to derive a dose to the nearest resident for the facility.

BACKGROUND

	Average Concentration	Dose (mrem)
Gamma Exposure:		200.70 (approx. 22.9 uR/hr)
Airborne Particulates:		
U nat	6.2 E-16 µCi/ml	0.34
Ra-226	3.9 E-16 µCi/ml	0.22
Th-230	3.9 E-16 µCi/ml	0.65
Gases:		
Radon-222	2.45 pCi/l	225.3
Total		427.21

Notes:

1. An equilibrium factor of 0.209 was used for radon based on seventeen (17) comparisons of radon-222 and radon-222 daughter concentrations from 1993 to the present. Please see attached sheet entitled "Equilibrium Factors for Nearest Resident".
2. Gamma and airborne particulate background data is from the revised Environmental Report (August 1994).
3. The background radon concentration at the upwind air station (Air 2) for the period was used to calculate background radon dose.
4. Calculation: (Radon concentration (pCi/l))*(Equilibrium factor)*(0.44 rems/pCi/l) = Dose (rems)

SECURITY TRAILER

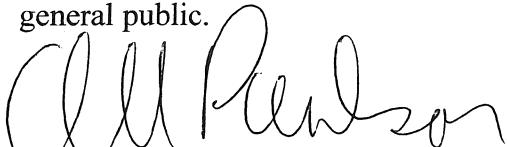
	Average Concentration	Dose (mrem)
Gamma Exposure:		182.00
Airborne Particulates:		
U nat	1.58 E-16 µCi/ml	0.09
Ra-226	1.53 E-16 µCi/ml	0.01
Th-230	1.08 E-16 µCi/ml	0.18
Gases:		
Radon-222	2.55 pCi/l	234.5
Total		416.78

Notes:

1. An equilibrium factor of 0.209 was used for radon based on seventeen (17) comparisons of radon-222 and radon-222 daughter concentrations from 1993 to the present.

2. Downwind airborne particulate concentrations and gamma doses for the first and second quarters of 2005 were used for the security trailer. These doses were converted to millirems per year (mrem/yr).
3. Radon concentration was measured in the security trailer for the first and second quarters of 2005 and is based on an average of RadTrak units located in two (2) locations; the kitchen and the bedroom.
4. The gamma dose rate is based upon the TLD dosimeters for the first and second quarters converted to an annual dose rate.

The net (dose to the nearest resident minus background dose) annual TEDE from the licensed operations for the first half of 2005 is 0 mrem/year, which is below the 100 mrem/year dose limit to members of the general public.

A handwritten signature in black ink, appearing to read "Oscar Paulson". The signature is fluid and cursive, with the first name "Oscar" written in a larger, more prominent script than the last name "Paulson".

Oscar Paulson

Avg dose.doc

Kennecott Uranium Company
Sweetwater Uranium Project

Equilibrium Factor for Nearest Residence
(Security Guard Trailer)

Date	Radon Concentration (pCi/L)	Exposure (WL)	Equilibrium Factor
1/1/93 – 6/30/93	3.2	0.009	0.28
1/1/97 – 6/30/97	1.5	0.003	0.20
7/1/97 – 12/31/97	2.2	0.002	0.09
1/1/98 – 6/30/98	1.65	0.003	0.18
1/1/99 – 6/30/99	1.90	0.009	0.47
7/1/99 – 12/31/99	3.25	0.002	0.06
1/1/00 – 6/30/00	2.12	0.004	0.19
7/1/00 – 12/31/00	3.05	0.009	0.30
1/1/01 – 6/30/01	3.60 ¹	0.012	0.33
7/1/01 – 12/31/01	2.78	0.013 ²	0.47
1/1/02 – 6/30/02	2.48	0.009 ²	0.34
7/1/02 – 12/31/02	2.80	0.003 ²	0.11
1/1/03 – 6/30/03	2.40	0.004 ²	0.17
7/1/03 – 12/31/03	3.75 ³	0.006 ²	0.16
1/1/04 – 6/30/04	2.08	0.003 ²	0.14
7/1/04 – 12/31/04	3.0	0.0005	0.017
1/1/05 – 6/30/05	2.55	0.0013	0.051
Average			0.209

¹ This value is based upon an average of three (3) RadTrak detectors. The second quarter RadTrak detector in the Security Trailer bedroom was lost.

² Average of two (2) measurements

³ Fourth quarter 2003 concentration only. Landauer, Inc. lost the third quarter 2003 RadTrak units.

Calculation Parameters

1. Radon concentrations in the Security Trailer are calculated based upon the results of two (2) RadTrak detectors (one in the kitchen and one in the bedroom) that are changed quarterly. The radon concentration for a given semiannual period is an average of the results of four (4) RadTrak detections, one in the kitchen and one in the bedroom, changed quarterly.
2. Radon exposures (radon daughters concentrations measured in Working Levels) are taken semiannually in the trailer in two (2) locations (kitchen and bedroom) using a Bendix BDX-44, MSA or Sensidyne GilAir II air pump and a filter. The filter is evaluated using the modified Kusnetz Method.
3. The equilibrium factor is calculated.

Radon Dose (rems) = (Radon Concentration (pCi/L)) * (Equilibrium Factor) * (0.44 rem/pCi/L)

An occupancy factor may be added as required.

1 WL ~ 100 pCi/L with daughters present (100% equilibrium)

Equilibrium Factor Formula: Equilibrium Factor = Exposure (WL) * 100 / Concentration (pCi/L)

Source: National Council on Radiation Protection (NCRP) Report #97