

THE CARBORUNDUM COMPANY

THE CARBORUNDUM METALS COMPANY DIVISION  
P. O. BOX 32 • AKRON, NEW YORK

September 13, 1961

U. S. Atomic Energy Commission  
Washington 25, D. C.

Attention: Mr. Donald A. Nussbaumer, Chief  
Source and Special Nuclear Materials Branch  
Division of Licensing and Regulation

Reference: 40-5001 and my letter of May 15, 1961 to J. C. Delaney

Gentlemen:

On September 6, we met with AEC representatives Mr. Donald Harmon and Mr. Carl Welty at our Parkersburg, West Virginia plant for a tour of our Nigerian ore processing facilities. I am sure this was an enlightening visit for all of us.

It was felt that our attempt at obtaining a full-term license for operation on Nigerian ore at Parkersburg would be enhanced by the following requested revision to Section 20.103 (b) (line 4) of 10 CFR Part 20: change "for forty hours in any period of seven consecutive days" to "averaged over 160 hours in any 28 consecutive days." This change is requested because the operation is on a continuous shift basis which calls for men to work seven consecutive days of 8 hours each. It is our understanding that this requested change has been routinely accepted for continuous operation in most uranium mills.

We would also like to request exemption from Section 20.203 (f) (2) pertaining to the labeling of containers. In our operations, in-process materials containing natural thorium in excess of ten times the quantities specified in Appendix C must be routinely handled. Many containers are employed in the transfer of material from one area or department of our plant to another. The areas are well marked. It is again our understanding that the necessity of labeling each container has been waived in uranium mill operations as long as the specific area or building has been properly posted as an area containing radioactive materials.

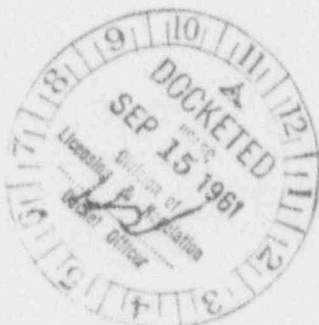
We hope that you will respond favorably to these requested revisions of 10 CFR 20 for our operations and further that this will enhance issuance of a term license.

Very truly yours,

THE CARBORUNDUM METALS COMPANY

*D. R. Spink*

D. R. Spink, Assistant to Manager  
Technical Branch



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