APR 23 1992

License: 43-03238-01
Docket: 030-06459
Control: 463542

U.S. Department of the Interior
ATTN: Stephen D. Hill
Research Director
Bureau of Mines
Salt Lake City Research Center
729 South Arapeen Drive
Salt Lake City, Utah 84108

Gentlemen:

We have reviewed your letter dated April 26, 1991, requesting an amendment to your byproduct material. Before further action can be taken, we will need the following additional information.

1. Item A.3 - your application requests that eating be permitted in the offices of Rooms 218, 224, and 225. We understand that these offices are located in laboratories where radioactive material is used. Before we can allow eating in these offices, you must address the following:

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- Specify the typical procedures carried out, quantities involved, and radioactivity measured for each isotope in each lab.

- Develop sufficient safety measures to assure there is no transfer of food, drink, or radioactive materials between the radioactive material use area and the eating area. For example, what measures will be taken to assure that employees remove their protective gloves and wash their hands before entering the eating area?

- Detail how the eating area will be separated from the working area and how the flow of radioactive material into the area will be restricted. For example, the area could be marked by tape and posted with signs, provided such notices are clearly visible to prevent inadvertent entry with radioactive material.

- Confirm that food, drink, or personal effects will not be stored with radioactive materials.

- Designate one sink in each lab that will only be used for non-radioactive hand, utensil, and/or dish washing. The sink must be restricted from radioactive material and should be included in the routine laboratory surveys.

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- Address the frequency of radiation surveys and types of measurements to be made in each of the labs. Alternatively, you may provide evidence that the existing frequency of scheduled surveys for each lab and corresponding air filtration systems will be effective in monitoring the safety of the designated eating areas.

- Describe both initial and periodic training. The training must specifically inform employees of the restriction in place and precautions to be followed.

- Assure that entry and exit to the designated eating and drinking areas can be obtained without bringing food and drink through a radioactive materials use area.

2. Item D.3. of your application states that radioisotope users must report any exposure received as a result of personal medical or dental x-ray. It's not clear how you are using this information.

   NRC does not permit a licensee to include an employee's medical exposure with his occupational exposure. NRC is only concerned with the radiation that an employee gets as a result of their employment. Your personnel monitoring reports must include only occupational exposure history.

   Please us how you are using this information.

3. We note that you stated shipping will not be done if the radioactive decay renders the waste low enough in activity to be disposed as regular waste. This statement makes you request unclear whether it is for interim storage pending availability of a waste broker for disposal in a licensed site, or for decay-in-storage. At the time of storage, waste must be identified as interim storage or decay-in-storage, and segregated as such. Specify how waste will be identified, segregated, and disposed.

4. Waste designated as interim storage must be disposed of at low-level waste disposal site licensed by NRC or an Agreement State or transferred to a licensee authorized to receive the waste. The Commission has stated that it will not look favorably upon long term on-site storage beyond January 1, 1996, for waste destined to a licensed disposal site. We understand that you are requesting a storage period of ten years. Justify the need for a storage period beyond the January 1, 1996, deadline.

5. Waste designated for decay-in-storage should be held for a minimum of ten half-lives or longer, depending on the isotope and total activity, before disposal in regular trash. Again, the NRC does not look favorably on decay-in-storage requests which extend beyond a five year timeframe. If your request is for a storage period of ten years, justify the need for the extension beyond the five year period.

6. Submit your survey procedures for monitoring waste before disposal. Also, specify for each radiation detection instrument used to survey the waste the manufacturer's name and model number, the type of radiation detected, the window thickness in mg/cm2, and minimum dete table activity.

7. Specifically, identify the isotopes of interest with half-lives between 65 and 120 days and the maximum possession limit needed. NRC policy requires your license to identify the isotopes with half-lives greater than 65 days that will be held for decay-in-storage.

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter. Please reply in duplicate and refer to the license, docket, and control numbers specified above. If you have questions or require clarification on any of the information stated above, we encourage you to contact us at (817) 860-8143.

Sincerely,
Original Signed By
Vivian H. Campbell
Vivian H. Campbell
Health Physicist
Nuclear Materials Licensing Section