



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

811 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

JUN 29 1992

In Reply Refer To:
License: 43-03238-01
Doc#t: 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 Arapahoe Drive
Salt Lake City, Utah 84108

Gentlemen:

We are continuing to review your letter dated April 26, 1991, and your May 8, 1992, response to our April 23, 1992, letter. Before your license can be amended to authorize your request, several issues must be resolved.

1. Our April 23 letter requested that you submit procedures for surveying waste before disposal in ordinary trash. The decayed radioactive waste must not be disposed as ordinary trash until the waste is held in storage for a minimum of 10 half-lives, the final survey results are at or below background radiation levels, and radiation labels are obliterated or removed. Submit a description of your survey procedures as requested.
2. The sketches of your storage facility do not appear to contain all the features identified in the physical description. We are unclear about the location of the door, the locking mechanism, and the ventilation slots. Provide a detailed sketch and description of the storage facility including the location of the door, the locking mechanism, and ventilation slots.
3. We are concerned that the ventilation slots will result in environmental conditions that will cause deterioration of the waste containers. You state that you "do not expect snow or rain to be in contact with barrels that will be raised from the floor by wood pallets." We believe that storing the barrels in a potential moist environment presents a hazard to the containers. Clarify if you expect water to get into the storage facility.

4. ✓ Inspecting the containers each time a barrel is added does not assure us that the contents will be adequately monitored even under excellent storage conditions. As a minimum, we expect the licensee to perform direct or remote visual inspections of containers quarterly. Amend your procedure for inspection of the containers accordingly.
5. You stated that you have no fire protection and suppression system in place and that none is needed. Tell us how you arrived at this conclusion, including discussion of the various considerations such as chemical properties of stored materials, etc.
6. The procedures you described for responding to emergencies are rather ambiguous. We understand that emergency services are available. However, you should describe your procedure for responding to emergencies and tell us how you will activate your plan if an employee identifies an emergency such as a fire.

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

RIV:NMLS *AK*

VHCampbell

6.12.192