

SLR:BM
40-2341

*Procr. II (FU Pend.)
1st Enforce. Ltr.
Same Citations*

MAR 4 1965

American Potash and Chemical Corporation
255 Ann Street
West Chicago, Illinois

Attention: Mr. Bruce J. Bennett
Plant Manager

Gentlemen:

LICENSE FILE ROUTING	
JNA	AMA
ETM	EPH
ECA	SLA

JDG

This refers to the inspection conducted on December 15, 16 and 17, 1964, of your activities authorized under ARC Source Material License No. STA-333.

It appears that certain of your activities were not conducted in full compliance with the requirements of the ARC's "Standards for Protection Against Radiation," Part 20, Title 10, Code of Federal Regulations, in that:

1. Two employees received whole body radiation doses of 1270 millirems and 1560 millirems respectively, during the first calendar quarter of 1963, and one employee received a whole body radiation dose of 1290 millirems during the fourth calendar quarter of 1963, contrary to 10 CFR 20.101, "Exposure of individuals to radiation in restricted areas." Since no Form ARC-4 had been completed for these individuals, their whole body exposures should have been limited to 1.25 rems during the periods in question.
2. Surveys of radiation levels within the plant were inadequate to assure compliance with 10 CFR 20.101 with respect to the external radiation doses received by employees, contrary to 10 CFR 20.201(b), "Surveys."

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3. Surveys conducted during the various thorium processing operations were inadequate to determine compliance with 10 CFR 20.103 with respect to the airborne concentrations of thorium to which employees were exposed, contrary to 10 CFR 20.201(b), "Surveys."
4. The Prep Area Area where source material was used and stored was not posted as required by 10 CFR 20.203(e)(2), "Caution signs, labels, and signals."

We note that items of noncompliance similar to the ones described in Items 1, 2 and 3 above were found also during the last previous inspection and brought to your attention in our notice dated November 29, 1962.

This notice is sent to you pursuant to the provisions of Section 2.201 of the AEC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office, within twenty (20) days of your receipt of this notice, a written statement or explanation in reply including (1) corrective steps which have been taken by you, and the results achieved; (2) corrective steps which will be taken; and (3) the date when full compliance will be achieved.

Regarding Item 3 above, we note that time weighted exposures were not determined for employees who worked at times in areas where the airborne concentrations of thorium exceeded the airborne concentration limit applicable for 40 hours exposure in a period of seven consecutive days.

We understand that surplus equipment which could be contaminated with thorium is on occasion sold by the Corporation as scrap. It is noted that while the equipment is usually steam-cleaned prior to

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transfer, this has not been done in every case. Also, we understand that scrap equipment has never been surveyed for contamination prior to its release. With your reply, please inform us of the steps which have been or will be taken by you to assure that scrap equipment, which has been used in thorium processing operations, is decontaminated to the extent set forth in our enclosure, prior to its release to unlicensed recipients.

Very truly yours,

Eber R. Price, Director
Division of State and
Licensee Relations

Enclosure:
Radioactivity Contamination Limits for
Abandonment of Facilities and Equipment

bcc: Compliance Div., HQ
Compliance Div., III
Public Document Room

SLR:EB
RN:lra:EGP

CO

DVL :B

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