



40-3453
RETURN ORIGINAL TO PDR, HQ.

ATLAS CORPORATION

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RICHARD E. BLUBAUGH
Vice President of Environmental
and Governmental Affairs

December 11, 1992

Mr. Ramon E. Hall, Director
Uranium Recovery Field Office
Region IV
U.S. NUCLEAR REGULATORY COMMISSION
Box 25325
Denver, CO 80225

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Re: Source Material License SUA-917
Docket No. 40-3453
Response to Notice of Violation

Dear Mr. Hall:

This response is in reply to your November 16, 1992 letter and inspection report which was received November 17, 1992. During an inspection conducted at our Moab Uranium Mill on October 28, 1992, an alleged violation of NRC requirements was identified. The violation involved the failure of the Licensee to document the approval of Radiation Work Permits (RWP) issued by the Radiation Control Coordinator (RCC) or his designee. This written response is being provided as required by provisions of Section 2.201 of the NRC "Rules of Practice", Part 2, Title 10, Code of Federal Regulations.

NRC

License Condition No. 25 of License SUA-917 states, in part, that Radiation Work Permits issued for nonroutine work shall be approved by the Radiation Control Coordinator or his alternate. Contrary to this requirement, documentation was not available to show approval by the RCC or his alternate of 27 RWPs issued between August 25, 1992 and October 16, 1992.

This is a Severity Level V violation (supplement VI).

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DESIGNATED ORIGINAL

Certified By *Mary C. Hood*

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ATLAS

1. Atlas admits that, at the time of the inspection, documentation was not available to show approval by the RCC or his alternate of some RWPs. However, Atlas believes that the RWPs were issued appropriately with the exception of the required signatures. This violation is of minor significance and has not changed the effect of our nonroutine radiation safety work program. The desired effects were being achieved overall as demonstrated by the low uranium concentrations measured from samples taken during such work.

2. Corrective steps which have been taken, and results achieved:

The RCC held a meeting with his alternates on October 29, 1992 and reviewed the procedure for approving the RWP documentation; corrections were made on this date.

3. Corrective steps which will be taken to avoid further violation:

Corrective steps were taken on October 29, 1992 to insure that no such violations would occur in the future. I will review the RWP documentation on a regular basis. If similar deficiencies are encountered in the future, disciplinary action will be initiated.

4. Date when full compliance will be achieved:

Full compliance was achieved on October 29, 1992.

Sincerely,

ATLAS CORPORATION



Richard E. Blubaugh
Vice President of Environmental
and Governmental Affairs

c: R.R. Weaver
D.L. Edwards