

PETROTOMICS COMPANY

TIDEWATER OIL COMPANY • MANAGING PARTNER

P. O. BOX 1844 • CASPER WYOMING

March 25, 1963

Mr. Ralph G. Page
Chief, Enforcement Branch
Division of Licensing & Regulation
U. S. Atomic Energy Commission
Washington 25, D. C.



Dear Mr. Page:

In regard to your letter received March 5, 1963, notifying Petrotomics Company of nine violations of the A. E. C.'s "Standards for Protection Against Radiation" Part 20, Title 10, Code of Federal Regulations, we will take each violation in the order you listed and give first, the corrective steps which have been taken; second, the corrective steps that will be taken; and, three, the date when full compliance will be achieved in each case.

ITEM 1

Over-exposure of five Petrotomics employees from May, 1962 through August, 1962.

1. Corrective steps which have been taken are the scheduling of less time for each man operating in these high exposure areas. Also, better housekeeping in these areas has been achieved. License No. SUA-551 was amended on November 9, 1962 to permit the averaging of air concentrates over eighty hours in the period of fourteen consecutive days.

2. Corrective steps which will be taken are continued good housekeeping and additional decreases of scheduled working time in these high exposure areas if surveys indicate possible over-exposure.

3. Full compliance has been achieved in respect to this item since September 1, 1962.

ITEM 2

Failure to report the above over-exposures to the A. E. C. within thirty days of each over-exposure.

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We at Petrotomics Company did not understand there to be any over-exposures until explained by Mr. George Smith, Division of Compliance, Denver, during his inspection of October 23-25. Had we been aware of these over-exposures, they would have been reported within thirty days. A report was filed as soon as we became aware of the over-exposures.

1. The corrective steps which have been taken are: (a) Report to the A. E. C. October 31, 1962; (b) Receipt of letter on November 9, 1962, which amended our License No. SUA-551 to permit the averaging of air concentrations over eighty hours in the period of fourteen consecutive days.

2. The corrective step that will be taken in the event of future over-exposures will be immediate notification within thirty days of over-exposure.

3. We have been in full compliance since October 31, 1962 in respect to this violation.

ITEM 3

Failure to notify five employees who were exposed to airborne concentrations of radioactive material in excess of the limits specified in 10 CFR 20.103.

1. The corrective steps taken have been the notifications in writing to the five over-exposed as set forth in 10 CFR 20.103 and 20.405.

2. In the future, over-exposed individuals will be notified within thirty days as set forth in 10 CFR 20.103 and 20.405.

3. We are now, as of March 20, 1963, in full compliance in respect to this item.

ITEM 4

Failure to take Breathing Zone Samples and failure to make adequate time studies from April 1, 1962 to October 23, 1962.

1. Breathing zone samples and adequate time studies have been taken since October 31, 1962.

2. Breathing zone samples and adequate time studies will be taken as specified by Part 20, Title 10 and License No. SUA-551.

3. We have been in full compliance since October 31, 1962 in respect to these items.

ITEM 5

Failure to make surveys to determine the concentrations of airborne radioactive material released to unrestricted areas.

1. Surveys have been started which will determine the concentrations of airborne radioactivity released to the unrestricted area around the mill. The direct sampling of the dryer stack has shown that the concentration is too high around the immediate discharge area to meet the MPC for an unrestricted area. However, large volume samples taken downwind from the stack on the edge of the unrestricted areas closest to the discharge of the stack have shown very low levels of airborne radioactivity.

2. Continuation of the environmental sampling program, especially downwind from the dryer stack is planned.

3. We have been in full compliance in respect to this item since February 1, 1963.

ITEM 6

Failure to post drying and packaging areas with signs bearing the correct wording.

1. Correct signs were posted before November 1, 1962.

2. No further action is planned.

3. We have been in full compliance in this area since November 1, 1962.

ITEM 7

Failure to have correctly worded signs on tailings area and signs not spaced at specified frequency.

1. Correctly labeled signs have been placed on the entrances to the tailings area.

2. An application for exemption in respect to frequency of signs will be made this month so that, if approved, signs need be placed only frequently enough so that there is always at least one sign in view from any vantage point.

3. We will be in full compliance in respect to this item as soon as we submit this request for exemption and it is approved.

ITEM 8

Failure to keep records of liquid effluent uranium analyses in the correct units as set forth in 10 CFR 20.401(b).

1. Since November, 1962, all uranium analyses of liquid effluents have been kept in the correct units. Also all analyses preceding November, 1962 have been changed to the correct units.

2. Continuation of reporting liquid effluent uranium analyses as set forth in 10 CFR 20.401(b) will be practiced.

3. We have been in full compliance since November 1, 1962 in respect to this item.

ITEM 9

Failure to submit the Quarterly Radiation Report on or before June 15, 1962 contrary to Condition 12 of License SUA-551.

1. This quarterly report was submitted late because of a mistake in handling in our Petrotomics office. We regret that this happened, and have taken precautions which will prevent this unfortunate occurrence again.

2. No further action is planned.

3. We have been in full compliance on this subject since submitting that report July 12, 1962.

We hope that the above information is sufficient to satisfy the requirements of Petrotomics Company in answering the Notice of Violations received March 5, 1963.

Since taking over the position of radiologist on December 21, 1962, I have been making every possible effort to see that our employees are fully protected at all times and that we maintain top record in the radiation safety field.

Sincerely yours,

D. S. Hutchinson
Radiologist

DSH:afn

FROM: Patricia Conway USAF, Dayton		DATE OF DOCUMENT: 3-25-63		DATE RECEIVED: 3-27-63		NO.: 205	
		LTR. <input checked="" type="checkbox"/>		MEMO: <input type="checkbox"/>		REPORT: <input type="checkbox"/>	
		ORIG.: <input checked="" type="checkbox"/>		CC: <input type="checkbox"/>		OTHER: <input type="checkbox"/>	
TO: main Page FLA		ACTION NECESSARY <input type="checkbox"/>		CONCURRENCE <input type="checkbox"/>		DATE ANSWERED: <input type="checkbox"/>	
		NO ACTION NECESSARY <input type="checkbox"/>		COMMENT <input type="checkbox"/>		BY: <input type="checkbox"/>	
CLASSIF.: <input type="checkbox"/>		POST OFFICE <input type="checkbox"/>		FILE CODE: 40-659			
REG. NO: <input type="checkbox"/>		DESCRIPTION: (Must Be Unclassified)		REFERRED TO		DATE	
		Ltr. ref. our 3-1-63 ltr. and advising us in regard to the steps taken to bring lic. 10-51 into compliance w/ regulations. 10-51 ENCLOSURES:		N. Page: 3-27-63			
				Handwritten:			
				w/1 compliance cy.			
				2-27-63			
REMARKS: Mail room instructions: 1- 1 cy. w/held 2.4 file 1-file cy. (retained)							