

Umetco Minerals Corporation

40-8681

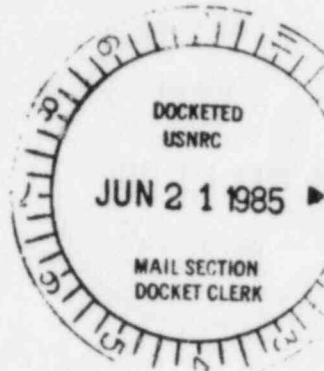


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June 20, 1985

RETURN ORIGINAL TO PDR, HQ.



Candice C. Jierree, Project Manager
Licensing Branch 2
Uranium Recovery Field Office, Region IX
730 Simms, Suite 100A
Denver, CO 80225

Re: SUA-1358
Umetco Minerals Corp.
White Mesa Mill

Dear Ms. Jierree:

In response to your initial evaluation of the White Mesa facility license renewal application as expressed to Mr. Don Sparling, Plant Manager, we have revised the submittals to clarify your concerns. Attached are five copies of the revised application, minus the large maps, which have not changed. Please replace the text portion of the original application with the enclosed. The majority of the application revision is identical to the original submittal and should not create any delays in the renewal process.

If you have any questions or concerns, please contact me at 303-245-3700, extension 234 to expedite the process.

Very truly yours,

Roger K. Jones
Environmental Coordinator

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Certified By Mary C. Hood

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Questions on the Renewal Application which pertain to the writing of the SER

5. The documents listed for inclusion as Appendix A are not included. Does the licensee wish only to reference documents which they assume the NRC maintains copies?

Answer: In our initial discussions with Mr. Ed Hawkins and Mr. Paul Hildenbrand of your office, it was determined that previous submitted documents by Energy Fuels Nuclear, Inc. did not require re-submittal by Umetco Minerals, but merely referenced for license condition purposes.

6. The internal mill inspection program is weak. The program should conform to Section 2.3 of Reg. Guide 8.31. A daily walkthrough visual inspection, a weekly inspection for observation of radiation control practices, and a monthly review of all monitoring data is needed.

Answer: In the original submittal, conformance to Section 2.3 of Reg. Guide 8.31 was demonstrated in the following sections: Page 55 of the main text; Page 4, ALARA program and Section 4 of the Quality Assurance Program under the Administrative Procedures Manual. The revised application includes more clarity as discussed in the main text, page 65, Section 5.3.2; Environmental Surveillance Manual, Page 156, Section 3.1; Administrative Procedure Manual, Section 3.6, page 74-75, ALARA Program; and in Section 4.7, Page 95 of the Quality Assurance Program. This details adherence to Section 2.3 of Reg. Guide 8.31.

7. Bi-monthly safety meetings need to be required. Also contractor safety training is not fully addressed.

Answer: The safety program includes an annual one-hour refresher training class and monthly discussions during scheduled safety training classes where radiation awareness and protection is a portion of the topics reviewed. The training program is discussed in the revised Administrative Procedure Manual, Section 6.0, specifically covering Umetco employees and Contractor training.

8. Airborne surveys for U-Nat. need to be performed weekly when the MPC exceeds 25 percent.

Answer: This requirement has been spelled out more directly in the revised submittal for airborne U-Nat. and radon progeny. See the revised Radiation Protection Procedures Manual, Sections 1.1.2, 2.1.2 and 2.2.3.

9. Enough information is present to approve use of protection factors unless the licensee specifies otherwise.

Answer: The respiratory protection program is designed to meet with NRC standards. We hereby request usage of protection factors; however, the usage of protection factors would be utilized judiciously in the evaluation of employees exposures.

Umetco Renewal Questions Necessary to Write the Environmental Assessment

7. No interim stabilization plans were proposed.

Answer: A plan for control of blowing tailings and stabilization of the tailing ponds is included in the revised submittal.

8. Surety information is missing. Property ownership.

Answer: Currently, surety is through the agreement between Umetco Minerals, Union Carbide Corporation and USNRC as issued by license amendment dated December 5, 1984. Prior to or at the conclusion of the one-year trial period, if the NRC so designates that this agreement cannot be carried forth, negotiations will be initiated to provide an appropriate form of surety for this facility. The value listed therein was \$4,235,830.00.

The property on which the site is located was acquired by Umetco Minerals Corporation in the majority acquisition of the White Mesa facility.

9. Decommissioning and Reclamation Plan within nine months of issuance of the new license.

Answer: Umetco Minerals proposes to utilize the Decommissioning and Reclamation Plan as submitted by Energy Fuels Nuclear for the facility as currently in place. Revised costs will be submitted as necessary for surety purposes.

10. The frequency of surface contamination surveys appears to have been omitted. Etc.

Answer: Section 2 of the original Radiation Protection Procedures Manual lists surface contamination alpha surveys as on a bi-weekly frequency. The revised procedure lists the frequency as weekly in the Radiation Protection Procedures Manual, Section 2.3.2.2.

11. The NRC will require annual fire evacuation drills.

Answer: The revised submittals discuss the fire prevention inspection program to be initiated. Semi-annual fire evacuation drills are included as discussed in the revised Administrative Procedures Manual, Section 1, page 12, subsection 1.11.8.

12. Restricted area markings and access control needs to be more inclusive. How is the site protected? What signs are posted? Is there 24-hour security? Is the entire site fenced?

Answer: The revised application provides more detail on this subject. The mill is enclosed by a chain link security fence. The restricted area, including the mill, is enclosed by a standard barbed wire fence. Caution-Radioactive Material and Restricted Area signs are posted at visible intervals on this perimeter fence. Personnel are on site 24-hours per day to provide additional security of the restricted area. Access gates are locked and posted to prevent unauthorized access. Gates involving major transport activity are manned during such activities.