

DLR:DFH
40-299
40-1856
40-1112

MAR 20 1962

Union Carbide Nuclear Company
Division of Union Carbide Corporation
270 Park Avenue
New York 17, New York

Attention: Mr. Sylvan Grosser
Vice President

Gentlemen:

This refers to that portion of your letter dated December 1, 1960, which requested exemption from Section 20.202(a)(1), 10 CFR 20, at your Globe, Trace Elements, Slick Rock, Uravan, Green River and Rifle uranium mills. In lieu of the provisions of this Section, you propose to furnish personnel monitoring devices to employees who receive, or are likely to receive a dose in any calendar quarter in excess of 50 percent of the applicable value specified in paragraph (a) of Section 20.101 rather than 25 percent as specified in Part 20.

Section 20.401 requires each licensee to maintain records showing radiation exposures of all individuals for whom personnel monitoring is required under Section 20.202. Section 20.404 requires each licensee to furnish to a former employee a report of the former employee's exposure to radiation as shown in records maintained by the licensee pursuant to Section 20.401(a), if requested by the former employee. Section 20.406 requires a licensee to advise each employee annually of the employee's exposure to radiation as shown in records maintained by the licensee pursuant to Section 20.401(a), if requested by the employee.

The purpose of requiring personnel monitoring devices is to determine and record significant radiation exposure received by employees and others involved in licensed activities as well as to determine compliance with Part 20. Although your proposal indicates that it is unlikely your employees would receive a radiation dose in excess of the limits of Part 20, it would in effect result in disregarding a dose of up to 625 mrem per quarter insofar as employees' exposure records are concerned. We believe such radiation doses are too high to be disregarded. Also your proposal would exclude those employees whose exposures fall within the 25 to 50 percent region of the applicable limits from the notification provisions of Part 20 referred to above.

OFFICE ▶

9612160234 620320
PDR ADCK 04000299
C PDR

SURNAME ▶

DATE ▶

MAR 20 1962

In view of the foregoing, your request to provide appropriate personal monitoring equipment to individuals likely to receive a radiation dose in excess of 50 percent of the applicable values specified in Section 20.101(a) is hereby denied. Pursuant to 10 CFR 2, "Rules of Practice," you may request a formal hearing on this matter within thirty (30) days from the date of this letter.

Sincerely yours,

Director,
Division of Licensing and Regulation

Enclosures:

10 CFR 2

10 CFR 20

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Br. and Div. rfs

Compl.

DFHarmon, LR

OFFICE ▶	LR	LR	CGC	IR	LR	IR
SURNAME ▶	<i>see att</i> DFHarmon	<i>see att</i> DNussbaumer	<i>see att</i> Hadlock	<i>see att</i> LJohnson	<i>see att</i> RLKirk	<i>see att</i> RLowenstein
DATE ▶	3/14/62	3/ /62	3/ /62	3/ /62	3/ /62	3/ /62

Union Carbide Nuclear Company -2-

In view of the foregoing and since your application did not provide any procedures or alternatives in lieu of the requirements of Part 20, your request to provide appropriate personnel monitoring equipment to individuals likely to receive a radiation dose in excess of 50 percent of the applicable values specified in Section 20.101 (a) is hereby denied. Pursuant to 10 CFR 2, "Rules of Practice," you may request a formal hearing on this matter within thirty (30) days from the date of this letter.

Sincerely yours,

Distribution:

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Enclosures:

10 CFR 2

10 CFR 20

Compl.

DFHarmon, LR

Director

Division of Licensing and Regulation

OFFICE ▶	LR	LR	OCC	LR	LR	LR
	see attached	see attached	see attached	see attached	<i>ML</i>	
SURNAME ▶	DFHarmon:rl	DNussbaumer	Haalock	IJohnson	RLkirk	RLowenstein
DATE ▶	3/13/62	3/ /62	3/ /62	3/ /62	3/13/62	3/ /62

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DFHarmon, LR

Union Carbide Nuclear Company
Division of Union Carbide Corporation
270 Park Avenue
New York 17, New York

Attention: Mr. Sylvan Cromer
Vice President

Gentlemen:

This refers to that portion of your letter dated December 1, 1960, which requested exemption from Section 20.202(a)(1), 10 CFR 20, at your Globe, Trace Elements, Slick Rock, Uravan, Green River and Rifle uranium mills. In lieu of the provisions of this Section, you propose to furnish personnel monitoring devices to employees who receive, or are likely to receive a dose in any calendar quarter in excess of 50 percent of the applicable value specified in paragraph (a) of Section 20.101 rather than 25 percent as specified in Part 20.

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The purpose of requiring personnel monitoring devices is to determine and record significant radiation exposure received by employees and others involved in licensed activities as well as to determine compliance with Part 20. Although your proposal indicates that it is unlikely your employees would receive a radiation dose in excess of the limits of Part 20, it would in effect result in disregarding a dose of up to 625 mrem per quarter from an employee's exposure record. We believe such radiation doses are too high to be disregarded. Also your proposal would exclude those employees whose exposures fall within the 25 to 50 percent region of the applicable limits from the notification provisions of Part 20.

referred to above.

In view of the foregoing and since your application did not provide any procedures or alternatives in lieu of the requirements of Part 20, your request to provide appropriate personnel monitoring equipment to individuals likely to receive a radiation dose in excess of 50 percent of the applicable values specified in Section 20.101(a) is hereby denied. Pursuant to 10 CFR 2, "Rules of Practice," you may request a formal hearing on this matter within thirty (30) days from the date of this letter.

Sincerely yours,

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DFHarmon, LR

Original signed
by R. Lowenstein

Director
Division of Licensing and Regulation

Enclosures:
10 CFR 2
10 CFR 20

OFFICE ▶	LR	LR	OGC	LR	LR	LR
SURNAME ▶	DFHarmon:ral	DANussbaumer	LJohnson	RLKirk	RLowenstein	
DATE ▶	3/13/62	3/13/62	3/13/62	3/13/62	3/19/62	

referred to above.

In view of the foregoing and since your application did not provide any procedures or alternatives in lieu of the requirements of Part 20, your request to provide appropriate personnel monitoring equipment to individuals likely to receive a radiation dose in excess of 50 percent of the applicable values specified in Section 20.101(a) is hereby denied. Pursuant to 19 CFR 20, "Rules of Practice," you may request a formal hearing on this matter within thirty (30) days from the date of this letter.

Sincerely yours,

*Retyped
because of
this type*

Director
Division of Licensing and Regulation

Distribution:

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Compl.

DFHarmon, LR

OFFICE ▶	LR	LR	OGC	LR	LR	LR
SURNAME ▶	DFHarmon:ral	DNussbaumer	LJohnson	RLKirk	FLowenstein	
DATE ▶	3/9/62	3/ /62	3/12/62	3/ /62	3/ /62	3/ /62