

DISTRIBUTION

40-6659/GRK/85/09/06/0

- 1 -
SEP 13 1985

Docket File 6659
LFMB/DCS/PDR
DBangart, RIV
GKonwinski
URFO r/f
WDEQ (2)
JHaes, RCPD, WY

URFO:GRK
Docket No. 40-6659
SUA-551, Amendment No. 9
040066592900
04006659291S
04006659292E

MEMORANDUM FOR: Docket File No. 40-6659

FROM: Gary R. Konwinski, Project Manager
Licensing Branch 2
Uranium Recovery Field Office, RIV

SUBJECT: AMENDMENT NO. 9 TO SOURCE MATERIAL LICENSE SUA-551

Background

By letter dated June 4, 1985, Petrotomics Company requested an amendment to Source Material License SUA-551. The amendment request specifically discussed mill decommissioning, a modified emergency action plan and a reduction in the radiological effluent and environmental monitoring program. Due to Petrotomics' mill dismantling plans, the mill site decommissioning was resolved under license action dated July 29, 1985. This memo will discuss the proposed plans for emergency action and proposed revision to the environmental monitoring and recommend the licensing action as appropriate.

Emergency Action Plan

The emergency action plan submitted by Petrotomics was in response to License Condition No. 38 which requires the licensee to submit such a plan by June 1, 1985 for review and approval. The Petrotomics' submittal included identification of situations whereby emergency actions should be initiated, a general notification procedure, a reporting/communications network, as well as procedures for each specific type of emergency situation.

		8509260253	850913			
		PDR	ADOCK	04006659		
		C	PDR			
ME						
E	85/09/12					

Transportation accidents involving yellowcake are detailed in the yellowcake spill emergency plan. The plan consists of a general notification procedure as well as a procedure for dispatching a response team. The team is made up of Petrotomics employees familiar with yellowcake handling and appropriate radiation safety procedures. The staff finds that this portion of the emergency action plan is no longer applicable due to decommissioning of the mill and the absence of yellowcake on site. Furthermore, licensing action dated July 29, 1985 authorized the licensee to possess only byproduct materials resulting from past operations.

Radiological Effluent and Environmental Monitoring Program

- The yellowcake dryer and packaging stack as well as the cooler stack are eliminated from sampling, because they no longer exist.
- The number of air particulate sampling locations has been reduced from five to four. An intermediate air sampler located between the restricted area boundary and the site boundary was eliminated from the program because electrical service to that portion of the property has been discontinued to enhance the safety of mill decommissioning.
- Radon sampling is conducted at the air particulate sampling locations; therefore, one radon sampling site is proposed to be eliminated.

C	:	:	:	:	:	:	:
ME	:	:	:	:	:	:	:
DATE	:	:	:	:	:	:	:
85/09/12	:	:	:	:	:	:	:

- The number of downwind vegetation sampling locations is proposed to be reduced from four to two. The one upwind site will remain.

The staff review of the proposed reductions in radiological effluent and environmental monitoring indicate that they represent a reasonable reduction in the program given the decommissioned status of the Petrotonics facility. The potential for a release to the environment diminished greatly with the decommissioning of the mill, removal of stockpiled ore and the implementation of an extensive tailings beach misting system.

Petrotonics has also proposed to modify their ground water monitoring program. This issue is under joint review between the NRC and the Wyoming Department of Environmental Quality. As such, this issue will be resolved under separate licensing action.

Conclusion

The staff review of the Petrotonics emergency action plan and the radiological effluent and environmental monitoring programs, as proposed in their June 4, 1985 submittal, indicate that appropriate safety considerations as well as lines of communication have been established. Similarly the proposed reductions in monitoring, with the exception the changes in the ground water monitoring as discussed above, are in keeping with the status of the facility. The staff therefore recommends that SUA-551 be amended by revising License Condition Nos. 11, 34 and 41 to read as follows:

11. For use in accordance with statements, representations, and conditions contained in Sections 3.4, 3.5, 3.6, Section 4 (excluding Section 4.3 and Appendices), and Section 5 (as modified by Section 7, excluding item 3, of the licensee's submittal dated June 4, 1985) and excluding Section 5.9 and Appendices and the requirements for general mill area gamma, dust and radon air sample locations shown in Tables 5.5.2-1, 5.5.2-2 and 5.5.2-3 of the licensee's application dated April 1, 1981 and revisions submitted by cover letters dated January 27, 1982; March 24, 1982; and September 27, 1983; except where superseded by license conditions below.

C	:	:	:	:	:	:	:
ME	:	:	:	:	:	:	:
TE :85/09/12	:	:	:	:	:	:	:

Notwithstanding the above the licensee shall use portable air sampling and lapel samplers (during the period of decommissioning) to determine worker exposure to airborne radionuclides on a job specific basis using the time cards.

Whenever the word "will" is used in the above referenced sections it shall denote a requirement.

34. The licensee shall implement the general emergency action plan as described in Section 6, excluding Section 6.4, of their June 4, 1985 submittal.
41. The licensee shall implement the environmental and effluent monitoring program as specified in Table 5.5.7-1 of the renewal application, as modified by Section 7, excluding item 3 of the licensee's submittal dated June 4, 1985.

/s/

Gary R. Konwinski, Project Manager
Licensing Branch 2
Uranium Recovery Field Office, RIV

Approved by:

/s/

Harry J. Pettengill, Chief
Licensing Branch 2
Uranium Recovery Field Office, RIV

Case Closed: 040066592900
04006659291S
04006659292E

C :	URFO	URFO	:	:	:	:	:
ME :	GKonwinski	HPettengill	:	:	:	:	:
TE :	85/09/12	9/13	:	:	:	:	: