



energy fuels nuclear, inc.

p.o. box 787 • blanding, utah 84511

January 30, 1997

Mr. James Park
U.S. Nuclear Regulatory Commission
Uranium Recovery Branch
Washington, DC 20555-0001

Re: License Renewal Application for White Mesa Mill
Source Material License SUA-1358
Docket No. 40-8681

Dear Mr. Park:

Attached, is a written summary of the chain of authority and qualifications for the various management positions at the White Mesa Mill. This revisions include the information about the Radiation Technician position that you requested by telephone yesterday.

These attachments should be inserted in the *Application for Renewal*, submitted by Umetco, Book 1, Section 5. The changes in the written summary reflect the current management at the White Mesa Mill.

If you have any questions, concerning this material, please contact me at (801) 678-2221.

Very truly yours,

William N. Deal
Mill Manager

cc: Harold R. Roberts
Michelle R. Rehmann
Ronald E. Berg

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5.0 ADMINISTRATION

5.1 Corporate Organization

Energy Fuels Nuclear, Inc. (EFN), the applicant, is the operator of the White Mesa Mill. EFN corporate headquarters are located in Denver Colorado. Milling operations are managed from the office located at the White Mesa Mill south of Blanding Utah. The staff at the mill receives support from the corporate office. The relevant company organization is illustrated in Table 5.1-1.

The authority and responsibilities of each level of management as shown in Table One are as follows:

The President of EFN is responsible for all of the practices and decisions made by those personnel reporting to him. He delegates the authority for the decisions in the uranium mill operations to the Mill Manager. He reports to the owner(s) of EFN.

The Environmental Manager reports to the President of EFN and provides services to the various operating units relative to environmental, radiation safety, occupational health, and permitting activities. This position performs periodic audits of the facilities to identify potential liabilities, ensure regulatory and corporate standard compliance, and, as required, recommend corrective measures.

The Mill Manager is responsible to the President of EFN in conducting the firm's uranium milling operations in a safe and efficient manner. These responsibilities include full responsibility for milling operations including safety and environmental programs, and security practices.

The Maintenance Superintendent reports directly to the Mill Manager, and has responsibility for all maintenance activities at the mill as well as responsibility to ensure compliance with applicable health, safety, and environmental practices and standards.

The Mill Superintendent reports directly to the Mill Manager and is responsible for the day-to-day operating procedures, equipment and accounting procedures. Duties also include reviewing appropriate mill operations with the Radiation Safety Officer and Site Safety Manager to assure operation compliance with Corporate and Regulatory Standards.

The Radiation Safety Officer is directly responsible for developing, implementing, monitoring, and reporting activities that assure that the mill radiation safety program meets applicable standards. This responsibility involves monitoring, maintenance, and evaluation of personnel exposure and plant area surveys; determination of occupational work modifications relative to radiation protection; personnel radiation protection training; maintenance of plant radiation monitoring equipment; and report preparation for regulatory agency compliance. The position reviews plant procedures and equipment and develops and coordinates policy adherence. The Radiation Safety Officer reports to the Mill Manager and is authorized to escalate concerns to the Environmental Manager or the President as deemed necessary.

5.0 ADMINISTRATION (continued)

The Safety Technician reports directly to the Radiation Safety Officer and implements, monitors, and reports safety affairs for the mill. Duties include general safety training of personnel; safety procedure and practice development, implementation; and enforcement; industrial hygiene monitoring other than radiation protection; first aid instruction and fire protection training. MSHA and corporate safety standards compliance are the responsibility of this position. The Safety Technician reports to the Radiation Safety Officer and is authorized to escalate concerns to the Mill Manager as deemed necessary.

The Radiation Technician reports directly to the Radiation Safety Officer and is responsible for performing radiation monitoring measurements throughout the mill area. This individual provides all necessary record keeping, survey data accumulation and analysis, instrument performance calibrations, and quality control requirements. The Radiation Technician reports to the Radiation Safety Officer and is authorized to escalate concerns to the Mill Manager.

The Environmental Technician provides necessary monitoring to comply with regulatory permits and licenses. These responsibilities include mill emission sources, solid and liquid waste disposal systems, and off-site environmental concerns. In addition, the Environmental Technician is responsible for the tailings reclamation technology and operating supervision of the tailings cells. The Environmental Technician reports directly to the Radiation Safety Officer and is authorized to escalate concerns to the Mill Manager as deemed necessary.

The Radiation Safety Officer, Safety Technician, Radiation Technician, and the Environmental Technician have sufficient authority to enforce regulation compliance and assure employee health and safety in the mill. They have the authority to cancel, postpone, or modify any operation or process which poses an immediate radiological, safety, or environmental hazard. The positions have the authority to escalate concerns to the Mill Manager or to the appropriate level of corporate management to ensure that all radiological, safety, and environmental considerations are being fulfilled and met. Each of these positions may be assigned support staff to maintain compliance with the applicable regulations. Such staff will be assigned primarily health, safety, and environmental duties and will not be assigned duties in areas where their authority or disposition to perform radiation protection duties is impaired.

5.0 ADMINISTRATION (continued)

5.2 Qualifications

The minimum qualifications of radiation protection personnel associated with uranium processing at the White Mesa Mill are as follows:

Mill Manager

Must have a B.S. degree in engineering or related physical science, or equivalent experience in management and/or operation of uranium processing operations.

Maintenance Superintendent

Must have a B.S. degree in engineering or equivalent experience in maintenance of uranium processing plants.

Mill Superintendent

Must have B.S. in engineering or equivalent experience in the operation of an uranium processing plant.

Radiation Safety Officer

Must meet the requirements of U.S. NRC Regulatory Guide 8.31, Information Relevant to Ensuring that Occupational Exposures at Uranium Mills will be as Low as is Reasonably Achievable, Section 2.4.1, Technical Qualification for Radiation Safety Officer. Must also have a working knowledge of applicable company, state and federal safety and environmental regulations.

Radiation Technician

Must meet the requirements of U.S. NRC Regulatory Guide 8.31, Information Relevant to Ensuring that Occupational Exposures at Uranium Mill will be as low as is Reasonably Achievable, Section 2.4.2, Technical Qualifications for Health Physics Technicians.