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40-3453

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DPHarmon, LR

APR 27 1962

Uranium Reduction Company
P. O. Box 488
Moab, Utah

Attention: Mr. R. F. Hollis
Vice President and General Manager

Gentlemen:

This refers to your application dated April 2, 1962, which requested authority to incinerate wet press papers containing source material.

In support of your application we require the following additional information:

1. A description, including drawings, of the Model 3FC incinerator, indicating how it is connected to the main stack and its relationship to the product drying hearth system.
2. Estimated quantities of uranium involved in each operation.
3. Frequency of incineration.
4. Procedures for handling the ash.
5. Procedures to prevent overexposure of personnel to airborne radioactivity during incineration including a description of the type, frequency and location of airborne radioactivity surveys to be made.

Sincerely yours,

Original signed
by R. Lowenstein.

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Director
Division of Licensing and Regulation

OFFICE	LR	LR	LR	LR	LR
SURNAME	DPHarmon:ral	DANussbaumer	LJohnson	RLKirk	RLowenstein
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APR 27 1962

Uranium Reduction Company
Box 488
Moab, Utah

Attention: Mr. R. F. Hollis
General Manager

Gentlemen:

This refers to your letter dated December 2, 1960, which requested exemption from Section 20.202(a)(1), 10 CFR 20, and to your letter dated November 29, 1960, which requested authority to release effluents containing radioactive material in concentrations greater than the limits in 10 CFR 20. We regret that, due to an inadvertence, our reply to these letters was not sent to you earlier.

In lieu of the provisions of Section 20.202(a)(1), 10 CFR 20, 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 75 percent of the applicable specified value.

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

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dose of 937 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 75 percent region of the applicable limits from the notification provisions of Part 20 referred to above.

In view of the foregoing, your request for an exemption from Section 20.202(a)(1) which requires you to provide personnel monitoring equipment to individuals likely to receive a radiation dose in excess of 25 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.

In support of your application to discharge liquid effluents containing radioactive material in concentrations greater than the limits in Part 20, we require the following additional information:

1. A detailed description of the area in which the mill is located including the following:
 - a. Location and size of nearby inhabited areas;
 - b. Location of streams and rivers;
 - c. Location of effluent streams showing points of discharge into the Colorado River; and
 - d. Points of water intake along the Colorado River which might be affected by the release of effluents.

A topographical map with the above identifications is preferred.

2. Your liquid effluent survey results for 1961, including sampling locations.
3. Your step-by-step procedure for radium, uranium and thorium analysis.
4. A description of the retention capability and integrity of your tailings dams, conditions that might lead to accidental release of the waste, the environmental effects of such release and your program of inspection and maintenance to prevent such an accidental occurrence. Your description of the retention capability and integrity of your system should include drawings showing the layout, heights, top width, side slopes, freeboard, seepage control,

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protection of embankment surfaces, foundation design, typical cross-sections of dams and characteristics of fill material, etc. This information should be supplemented by a discussion of construction methods and specifications. You should also include your reasons in detail why the dams cannot be constructed to prevent overflow or the effluents treated to remove radioactive materials.

Sincerely yours,

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DFHarmon, IR

Director

Division of Licensing and Regulation

Signed by
R. Lowenstein

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