

# Atlas Minerals

Division of Atlas Corporation

P.O. Box 1207 Moab, Utah 84532

October 2, 1978

Mr. Glen D. Brown, Chief  
Fuel Facility and Material Safety Branch  
United States Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011

Mr. Brown:

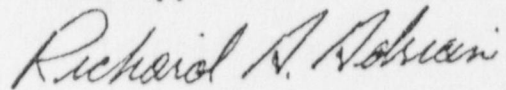
We have received your September 7, 1978 letter and the attached Notice of Violation. Our comments are:

1. No comment required.
2. We are aware of the requirement of paragraph C.2, Regulatory Guide 3.15, and comply with this requirement to the best of our ability. We therefore select respiratory protection equipment adequate to provide the appropriate protection factor, based on the air count history of the area involved. In the instance cited a respirator providing a protection factor of 50 was specified. This should have been adequate for the area involved. The personal air monitor data, which of course is not available until after the fact, indicated that a protection factor of around 300 would have been required to meet C-2 requirements. I believe the personal air sampler used in this case must have been contaminated, because the respirator used actually did provide the men involved with adequate protection. Bioassay data on the men involved confirm that no significant exposures occurred. We will continue to specify respiratory protection equipment very conservatively. NO
3. Procedures to assure compliance with 10 CFR 21.21 (a) have now been implemented. NO
4. No comment required.
5. The inventory report required by 10 CFR 40.64 (b) was not submitted in 1977. This was an oversight due to a reorganization in our accounting department - it should not happen again. The 1977 report was filed on August 14, 1978, and the 1978 report will be filed within 30 days after September 30, 1978.

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6. The posting requirements of 10 CFR 21.6 have now been satisfied.

Sincerely,

A handwritten signature in cursive script, reading "Richard A. Adrian".

Richard A. Adrian  
General Superintendent

RAA:sd