



Sisecam Wyoming, LLC

PO Box 513
254 County Road 4-6
Green River, WY 82935
Phone: 307-875-2600

ADAMS Accession# ML22206A267

June 28, 2019

BY U.S. MAIL & EMAIL (Lizete.Roldan-Otero@nrc.gov)

ATTN: Document Control Desk, Washington,
DC 20555-001
Lizette Roldan-Otero PhD,
Chief
Materials Inspection Branch
Division of Radiological Safety and Security
U.S. Nuclear Regulatory Commission Region IV
1600 E Lamar Blvd
Arlington, TX 76011

Re: Reply to Notice of Violation; in NRC Inspection Report 030-06803/2022-001
Mine Name: Sisecam Wyoming, LLC
Docket No. 030-06803
License No. 49-11578-01

Dear Messrs. Roldan-Otero,

Sisecam Wyoming, LLC operates the Big Island Mine and Refinery in Green River, Wyoming. During the announced routine inspection on May 3, 2022, two Notice of Violations were given for: 10 CFR 20.1101(a) and condition 13.1 of NRC license 49-11578-01 Amendment 28. The notice of violation was sent digitally on the morning of June 28, 2022. The following is the "Reply to Notice of Violation; in NRC Inspection Report 030-06803/2022-001"

Notice of Violation No. [A] (May 3, 2022)

Notice of Violation: No. A, was written on June 27, 2022, from the unannounced routine inspection of the facility on May 3, 2022.

The Citation reads as follows.

10 CFR 20.1101(a) requires that each licensee shall develop, document, and implement a radiation protection program commensurate with the scope and extent of licensed activities and sufficient to ensure compliance with the provisions of 10 CFR Part 20. Contrary to the above, from July 26, 2018, to the date of the inspection on May 3, 2022, the licensee failed to develop, document, and implement a radiation protection program



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commensurate with the scope and extent of licensed activities and sufficient to ensure compliance with the provisions of 10 CFR Part 20. Specifically, the licensee's radiation safety officer (RSO) began performing the functions of the RSO on July 26, 2018, but was never provided electronic access to the individual work orders that are used to document whether leak tests and shutter checks were actually being performed as requested; this led, in part, to the failure of the licensee to demonstrate that leak tests had actually been performed as requested in the work orders. Subsequently, the licensee's radiation protection program was not sufficient to ensure compliance with the provisions of leak testing of sealed sources at the required intervals, and was not sufficient to allow the appropriate oversight of the radiation protection program by the RSO.

- 1) Reason for the violation, or, if contested, the basis for disputing the violation or severity level
 - a. While the RSO had access to all employees and could follow up on the status of work orders through inspections and conversations with the appropriate teams to ensure the appropriate steps were being taken, the computerized work order system showed a work order as: Duplicate, On Work Order, Completed, Scheduled, or Rejected. The system did not allow the RSO to open each individual work order to ensure the checklist of steps needed for compliance were checked off in the system.
- 2) The corrective steps that have been taken and the results achieved
 - a. Access was granted to the RSO on June 14th, 2022, to be able to open up work orders and see the checklist being performed
- 3) The corrective steps that will be taken
 - a. Additionally, we will be assigning asset tags for the work orders to each individual nuclear gauge to make the documentation easier to provide for the annual audit and upon request from a government agent
- 4) The date when compliance will be achieved
 - a. Compliance for the citation has been achieved. The additional steps to better organize the process may take a few months but will be completed by year's end.

Notice of Violation No. [B] (May 3, 2022)

Notice of Violation: No B, was written on June 27, 2022, from the unannounced routine inspection of the facility on May 3, 2022.

The Citation reads as follows.



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Condition 13.H of NRC License 49-11578-01, Amendment 28, issued July 26, 2018, requires, in part, that records of leak test results shall be maintained for 3 years. Contrary to the above, as of May 3, 2022, the licensee failed to test each sealed source and detector cell for leakage and/or contamination at intervals not to exceed 6 months or at such other intervals specified in the certificate of registration issued by the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or by an Agreement State, and to maintain the leak test results for 3 years. Specifically, from the date of the previous inspection on September 15, 2016, to the date of this inspection on May 3, 2022, the licensee failed to demonstrate that each sealed source was leak tested at the required interval; the certificate of registration for these particular fixed nuclear gauges documents the leak test interval to be 36 months. There were no records available to demonstrate that the following fixed nuclear gauge sealed sources had been leak tested at 36-month intervals: Serial Numbers FN778, FN782, FN898, FN899, and FR285.

- 1) Reason for the violation, or, if contested, the basis for disputing the violation or severity level
 - a. A switch over from systems, from Oracle to Microsoft D365, had a few of the leak tests fail to be incorporated into the new system.
- 2) The corrective steps that have been taken and the results achieved
 - a. Leak tests for those serial numbers were completed the 16th of June and mailed out on the 17th of June. Results were received from the lab on June 28th. All results were under the level of detection of $<0.005 \mu\text{Ci}$
- 3) The corrective steps that will be taken
 - a. Printing out a list of work orders at the end of the year tied to the leak tests and verifying with the results to ensure compliance
- 4) The date when compliance will be achieved
 - a. Leak tests are currently compliant.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Jeremiah Rawson, RSO
Industrial Hygiene Specialist
Sisecam Wyoming, LLC
254 County Road 4-6
P.O. Box 513
Green River, WY 82935
jrawson@ciner.us.com