genesisalkali

August 30, 2022

United States Nuclear Regulatory Commission [via 1st class mail]
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Washington DC 20555-0001

Ms. Mary C. Muessle, Director [via federal express]
Division of Radiological Safety and Security
Nuclear Regulatory Commission
Region IV
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Email: R4Enforcement@NRC.gov

Re: NRC INSPECTION REPORT: 030-06794/2022-001; EA-22-067
INSPECTION RESPONSE: Written response to apparent violation
DOCKET NUMBER: 030-06794
LICENSE NUMBER: 49-04295-01
Response to Apparent Violation in NRC Inspection Report 030-06794/2022-001; EA-22-067; Letter from NRC date 22 August, 2022

1. Reason for the apparent violation

Genesis Alkali has more than one storage facility for nuclear gauges on their site in Green River Wyoming. This particular storage unit held newly purchased nuclear gauges, to be placed into the Granger Facility, once a renovation/upgrade to the facility was reached. The exterior storage unit keys were inadvertently left laying on a crate near the storage bunker 39 days before this inspection by the NRC. It was not noticed by Genesis Alkali personnel or the RSO until NRC requested to see the new gauges as part of their inspection. This happened due to there being no need for anyone to be going into the storage unit until such time as the upgrade to the site was completed; so the missing keys were not noticed by site staff or the RSO.

2. Corrective steps that have been taken and results achieved

The first step was to lock the storage unit after the NRC inspector reviewed the contents and return the keys to their proper "safe keeping" location, which is actually at the Westvaco site. The second step was to discuss better options for safe storage of gauges.

IE07
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RGN-IV

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3. Corrective steps that will be taken

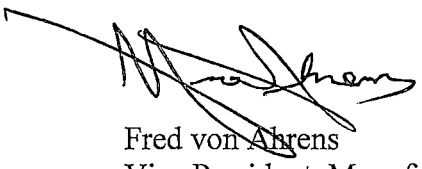
The storage units for gauges will be upgraded to combination locks, so there will be no external locks requiring keys. The locks that will be considered for this purpose will be selected based on their ability to withstand the harsh weather conditions and "trona" environment in which they must be placed; several locks will be tested to see which works the best for Genesis Alkali operations. In addition, Genesis Alkali will institute a review plan to verify operational status of new locks on a monthly basis for one year, to assure they not only stay locked in light of the environmental conditions, but also that access to the storage unit also remains possible. If these locks serve their purpose properly, these will become an internal requirement for Genesis Alkali. If these locks do not withstand the rigors of the environment Genesis Alkali will pursue other options to secure the unit. NOTE: Genesis Alkali, in the event of failure of these locks, may restore key entry to the unit. Only the RSO and management at Genesis Alkali can approve this change; this would not be deemed a permanent replacement for use of combination locks. These keys would be kept in a lock box; only personnel, authorized by the RSO would be able to access the box. The overall goal is to utilize combination locks that do not require individuals to have a physical set of keys in their possession. Other options may be considered by Genesis Alkali as needed to assure continuous security and control of gauges in storage. Potential combination locks will be tested throughout the upcoming winter and a selection of a suitable replacement for the key lock system will be instituted company-wide for radioactive material storage units.

4. Date when full compliance will be achieved

The selection of combination locks to test will be made by 15 October, 2022. At the end of May, 2023, a selection of a combination lock system will be selected to be used site-wide at Genesis Alkali.

If you have any questions, or require additional information, please contact John James at 307/872-2320 or john.james@genlp.com.

Sincerely,



Fred von Ahrens
Vice President, Manufacturing
Genesis Alkali

Cc: Andre Azevedo, Director, Maintenance
John James, Electrical Maintenance Engineer