

July 26, 2000

Mr. Michael J. Mocniak,
Fansteel, Inc.
Number One Tantalum Place
North Chicago, Illinois 60064

SUBJECT: NRC STAFF REVIEW OF LICENSE CONDITION 24 AMENDMENT REQUEST
(TAC L31305)

Dear Mr. Mocniak:

The staff has reviewed your January 25, 2000 letter which contained a request for several changes to your license SMB-911. The letter specifically requested a change to license condition 24, and numerous changes to Part I of the license application. As discussed in several telephone conferences, there is additional information which is needed before the staff can make a final determination on this request. The request for additional information is enclosed.

In addition to submitting the requested information, a complete Part I of the license application is requested. This new copy should include a date and a revision number on each page. Any revised pages submitted in the future should contain the new date, new revision number and continue to include the change bars in the right hand margin.

During the review the staff noted that there were changes made to Part 1 of the license application which were not marked with a side bar. All changes to the license application should be clearly marked and if in the future an amendment request contains unmarked changes, the entire request will be denied and returned without further review.

Please review the enclosed request for information and submit the requested information within 60 days of the date of this letter. If you have any questions concerning this request, or if more time is needed to respond to the questions, please contact me by phone on 301-415-5819 or e-mail at hma@nrc.gov.

Sincerely,

/RA/

Heather Astwood, Project Manager
Fuel Cycle Licensing Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS

Docket 40-7580
License SMB-911

Enclosure : Request for Additional Information

cc: Mr. A. Fred Dohmann
 Fansteel
 Number Ten Tantalum Place
 Muskogee, OK 74403

Please review the enclosed request for information and submit the requested information within 60 days of the date of this letter. If you have any questions concerning this request, or if more time is needed to respond to the questions, please contact me by phone on 301-415-5819 or e-mail at hma@nrc.gov.

Sincerely,
/RA/

Heather Astwood, Project Manager
Fuel Cycle Licensing Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS

Docket 40-7580
License SMB-911

Enclosure : Request for Additional Information

cc: Mr. A. Fred Dohmann
Fansteel
Number Ten Tantalum Place
Muskogee, OK 74403

Distribution: (Control No. 260S)[PARTIAL]

Docket 40-7580 PUBLIC NMSS r/f FCSS r/f
LIB r/f LCarson, RIV TSmith, DWM LRAFky, OGC
SWoods, DWM LFields
G:\FCLB\lic-cond-24-ltr.wpd

OFC	FCLB		FCLB		FCLB	
NAME	H Astwood				LRoché	
DATE	7/ 25 /00		7/ /00		7/ 25 /00	

C = COVER

E = COVER & ENCLOSURE

N = NO COPY

Request for Additional Information

1) The last sentence of Section 2.7 should be removed. Section 2.7 was revised to indicate that a variety of records including records related to employee training, audits and inspections, radioactive releases, and environmental surveys would be maintained for “at least 2 years”. Some of these records are required by the regulations to be maintained longer than 2 years, as specified by §20.2102, §20.2103, and §40.36(f).

2) Section 3.4 should be revised to include current description of the General Safety Procedures which are taught as part of the training program. This section should be revised to give a general outline of the safety procedures which are taught to the workers and should reflect the current situation at the site. The general licensing commitments made in this section such as bullets #4, 7, 8, and 9 should be moved to another more appropriate section.

In addition, the respiratory protection statement was modified to no longer require respirators in an emergency. No justification was provided for this change. Provide a detailed justification for this reduction in respiratory protection and revise this bullet to indicate when respiratory equipment must be used.

3) Section 3.5.1. The 3rd paragraph originally stated that specific actions would be taken if the action level was exceeded. This paragraph was changed to include a more detailed list of actions that *might* be taken if the action level is exceeded. This change does not provide NRC with sufficient information to make the determine that appropriate actions will be taken to prevent the Part 20 limits from being exceeded. Revise this paragraph to indicate exactly what actions will be taken by the PRSO when the action level is exceeded.

4) Section 3.5.1 - paragraph 5. The 3rd sentence - “Monitoring will be conducted to measure ventilation performance.”, was changed to indicate that monitoring will only be conducted during the life of the first filter. Ventilation monitoring should continue throughout the life of the process. This is not an equivalent change and no justification was provided. Provide justification for this reduction in monitoring.

5) In Section 3.5.2 weekly surface contamination surveys were changed to bi-weekly. No justification for this reduction in frequency was provided. Provide a rationale for this reduction in sampling frequency.

6) Section 3.5.2 also was changed from “Any spilled material is to be immediately cleaned up...” to “...any spill in excess of normal end-of-shift cleanup...” This statement should be modified to be clear and quantitative. Provide a justification for this change, and modify the statement to include the parameters for determining when a spill is to be cleaned up for both radiological and non-radiological liquid and solid spills.

7) Section 3.5.5, #2 The first sentence should be modified to include both *monitoring well* and *effluent samples*.

8) Section 3.5.5, #3 has been changed to state that exceedances of the Part 20 release limits that require a report to the regional administrator will be reported 30 days after *verification* of

the exceedance. This change should be removed. Part 20 regulations require that reports be submitted within 30 days of the date of the occurrence, or knowledge of the occurrence, not verification of it.

9) Section 3.5.11 was substantially modified to be consistent with the request to modify license condition 24. In an SER dated December 18, 1997, the NRC staff described actions Fansteel had committed to take in response to NRC concerns over the monitoring of product streams. Based on this SER the staff determined that license condition 24 was necessary. In addition the information contained in the current section 3.5.11 was submitted to NRC in a letter dated May 17, 1999 and is important to support license condition 24. The staff has reviewed the past license application packages and SERs and has determine that section 3.5.11 is needed and should remain unchanged from the May 17,1999 version. Therefore the changes to this paragraph should be removed.