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**Subject: Comments on Draft Regulatory Guide DG-8027
Information Relevant to Ensuring that Occupation Radiation
Exposures at Uranium Recovery Facilities Will be As Low
As is Reasonably Achievable**

Dear Sir or Madam:

Rio Algom Mining Corp. (RAMC) is providing its comments to the Draft Regulatory Guides, DG-8027. These comments are presented in below.

General Comment on the Draft Regulatory Guide, DG-8027

In some cases, licensees have license conditions that tie their source material license to the Regulatory Guide, DG-8027. In most cases, that tie-down is to a specified section guide, but it can be a tie-down requirement to the entire guide. RAMC recommends that NRC add language to the introduction of the guide that clarifies that recommendations in the guide that states that license requirements established through license conditions and amendments have precedence over recommendations provided in the Regulatory Guide.

Additionally, in cases where a licensee is required to follow the Regulatory Guide through a license condition, RAMC suggest that the NRC provide some consideration for existing programs put in place by licensees. In some cases, the elements of the existing programs are not exactly consistent with the recommendations in the Regulatory Guide but are in compliance with all regulatory and license requirements.

**Regulatory Guide DG-8027 (Proposed Revision I of Regulatory 8.31)
Information Relevant to Ensuring that Occupational Exposures at Uranium
Recovery Facilities Will be As Low As is Reasonably Achievable**

Sections 3 and 4

In general, this regulatory guide is intended not only for experienced NRC and facility health physics staff, but it is also a means of informing new health

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Att: ANN BERANEK (AFB)

physics personnel with both NRC staff and the licensee of the real expectations for the application of ALARA at uranium recovery facilities. In these two sections, it is apparent that the intent of the text is to identify areas within a uranium recovery facility where the concept of ALARA can be applied. The majority of the areas discussed are only relevant to conventional uranium mills, and there is no differentiation of how these suggestions may or may not apply to ISL uranium recovery facilities. Of the operating uranium recovery facilities, ISL is the dominant of the recovery processes used in the industry at this time. There should be some discussion of the differences in the two types of facilities with respect to potential hazards and expected performance. For example, the potential fire hazards in an IX/elution process of an ISL facility is significantly different than a solvent-extraction process found at a conventional mill. For example, the entire discussion of Section 3.4 is dedicated to fire hazards within a conventional mill facility. Section 4 describes the four areas that present radiological and toxic airborne hazards at a "*typical uranium recovery facility*". These four areas include Ore Storage, Handling and Crushing Areas; Grinding Leaching and Concentrating Process Areas; Precipitation, Drying, and Packaging Areas; Miscellaneous Locations. Of these four areas, only two can be realistically found in an ISL facility, and yet, the text of this section does not differentiate between the two types of processes.

If you have any questions, please call me at (405) 858-4807, or I can be contacted by email at pgoranson@ramc.net.

Sincerely,



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