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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

February 8, 2001

VIA FACSIMILE & OVERNIGHT MAIL

Administrative Judge
Ann Marshall Young
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Mail Stop T-3-F23
Washington, D.C. 20555-0001

Re: International Uranium (USA) Corporation

Dear Honorable Judge Young:

Pursuant to your order dated February 6, 2001, enclosed please find the letter dated November 16, 2000 (Operating Procedure for Determination of Available Tailings Capacity) and the letter dated December 18, 2000 (Supplemental Information Regarding April 12, 2000 Amendment Request to Process an Alternate Feed Material from W.R. Grace at the White Mesa Uranium Mill Source Material License SUA-1358). Under copy of this transmittal letter, copies of the aforementioned letters have also been sent for overnight delivery to the Petitioner, Sarah Fields.

Copies of each have been served on counsel of record as indicated in the enclosed certificate of service.

Sincerely,



Frederick S. Phillips

Enclosures

cc: Office of Rulemakings and Adjudication
David Frydenlund

Template = SECY-043



INTERNATIONAL
URANIUM (USA)
CORPORATION

Independence Plaza, Suite 950 • 1050 Seventeenth Street • Denver, CO 80265 • 303 628 7798 (main) • 303 389 4125 (fax)

November 16, 2000

VIA FACSIMILE & FIRST CLASS MAIL

Mr. William von Till, Project Manager
Fuel Cycle Licensing Branch
U.S. Nuclear Regulatory Commission
Mail Stop T-8A33
Washington, D.C. 20555

Re: Operating Procedure for Determination of Available Tailings Capacity

Dear Mr. von Till:

Amendment 15 to the White Mesa Mill Source Material License No. SUA-1358 regarding the revision to the Reclamation Plan, revised License Condition 9.11 states the following:

“The final reclamation shall be in accordance with the May, 1999, Reclamation Plan Revision 2.0, Attachment A submitted on June 22, 1999, and Revision 3.0 submitted on July 7, 2000, and July 17, 2000. Prior to the placement of alternate feed material, the licensee shall determine that adequate cell space is available for that additional material. This determination shall be made by a SERP approved procedure.”

A copy of the draft procedure for determining whether sufficient tailings capacity is available for either an alternate feed or a conventional ore run was sent to you on August 11, 2000 for comment. However, Linde material was scheduled to be received at the White Mesa Mill on September 25, 2000. As a result, ~~the procedure was reviewed, amended and approved by the SERP Committee prior to receiving any~~ comments from you.

Please find attached the SERP approved copy of the procedure, which was implemented prior to the receipt of the Linde material. Also attached is a blackline copy illustrating the changes made by the SERP. We would appreciate any comments you may have regarding this procedure. However, unless we hear otherwise from you, we will continue to implement the procedure in the form attached to this letter.

If you have any questions regarding the attached or require any further information please do not hesitate to contact me at (303) 389-4153, or by e-mail at rhochstein@intluranium.com.

Sincerely,

Ron F. Hochstein
President & C.E.O.

RFH
Attachments

cc: David C. Frydenlund
Michelle R. Rehmann

No.: PBL-3 Rev. No.: R-0 Date: September 25, 2000	INTERNATIONAL URANIUM (USA) CORPORATION STANDARD OPERATING PROCEDURES Title: Tailings Capacity Evaluation	Page 1 of 2
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1.0 Purpose:

The U. S. Nuclear Regulatory Commission (NRC) license for the White Mesa uranium mill (Mill) is a Performance-Based License (PBL). The PBL allows International Uranium (USA) Corporation ("IUSA") to evaluate and implement certain changes in the licensed operation without applying for and receiving a formal amendment to the NRC license. The following procedure outlines the steps to follow when accepting additional conventional ore or alternate feed materials, to ensure that the currently permitted capacity of the Tailings Management System is not exceeded. This Standard Operating Procedure (SOP) is as per the Mill's NRC License.

2.0 Tailings Capacity Determination Procedure:

Whenever the Mill is considering receiving conventional ore, 11e(2) material, or an alternate feed, the capacity of the Mill Tailings System will have to be determined to ensure that sufficient volume is available to store the projected incremental volumes of tailings material, as well as the projected volumes of waste material from final reclamation of the Mill facility, based on the approved Reclamation Plan. This evaluation will be performed by the Mill Manager, or his designee, and approved by the President of IUSA, or his designee.

The procedure for determining whether there is sufficient capacity is described as follows and documented on the attached Tailings Capacity Form.

- 2.1 For the first evaluation, the base volume ("BV") available will be based on the capacity stated in the **Tailings Capacity Evaluation** report submitted to the NRC May 15, 2000 (a copy of which is attached). For each subsequent evaluation, the previous evaluation will produce a remaining tailings capacity value, which will become the BV.
- 2.2 Mill Management will maintain a Tailings Capacity Evaluation Record ("TCER") book, in which all evaluation forms and supporting calculations will be maintained. Refer to the TECR to obtain the BV value to be used in each subsequent evaluation.
- 2.3 The volume of tailings discharged to the active tailings cells between the date of the BV and the evaluation date will be estimated based on the Mill's production reports.
- 2.4 The amount of Mill site trash disposed of in the tailings system will be determined. The number of loads of trash hauled between the date of the BV and the evaluation date will be taken from the Garbage Log.

No.: PBL-3 Rev. No.: R-0 Date: September 25, 2000	INTERNATIONAL URANIUM (USA) CORPORATION STANDARD OPERATING PROCEDURES Title: Tailings Capacity Evaluation	Page 2 of 2
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- 2.5 The amount of 11(e).2 in-situ waste material deposited into the tailings system between the date of the BV and the evaluation date will be summarized. The quantities of material will be listed by supplier and will be based on the Scale House Weigh Tickets from each shipment.
- 2.6 The BV, minus the quantities in items 2.3, 2.4 and 2.5 above, will become the current tailings capacity. This number will be used as the BV (item 2.1 above) for the subsequent evaluation.
- 2.7 The amount of alternate feed material or conventional ore committed to be processed and deposited into the tailings system will be summarized. The maximum projected quantities of material will be listed by supplier and stated in dry tons, i.e. less the estimated moisture content.
- 2.8 The sum of the quantities estimated in item 2.7 above will be subtracted from the current tailings capacity calculated in item 2.6 above, to determine the remaining capacity available.

No.: Draft-4 Rev. No.: 0 Date: August 11, 2000	INTERNATIONAL URANIUM (USA) CORPORATION STANDARD OPERATING PROCEDURES Title: Tailings Capacity Evaluation	Page 1 of 2
<u>No.: PBL-3</u> <u>Rev. No.: R-0</u> <u>Date: September 25, 2000</u>	<u>INTERNATIONAL URANIUM (USA) CORPORATION</u> <u>STANDARD OPERATING PROCEDURES</u> <u>Title: Tailings Capacity Evaluation</u>	<u>Page 1 of 2</u>

1.0 Purpose:

The U. S. Nuclear Regulatory Commission (NRC) license for the White Mesa uranium mill (Mill) is a Performance-Based License (PBL). The PBL allows International Uranium (USA) Corporation ("IUSA") to evaluate and implement certain changes in the licensed operation without applying for and receiving a formal amendment to the NRC license. The following procedure outlines the steps to follow when accepting additional conventional ore or alternate feed materials, to ensure that the currently permitted capacity of the Tailings Management System is not exceeded. This Standard Operating Procedure (SOP) is as per ~~NRC License the Mill's Condition No. 9.11, License Amendment No. 15, dated July 21, 2000 (A copy of the License Amendment transmittal letter and the Technical Evaluation Report are attached).~~ NRC License.

2.0 Tailings Capacity Determination Procedure:

Whenever the Mill is considering ~~processing~~ receiving conventional ore, 11e(2) material, or an alternate feed, the capacity of the Mill Tailings System will have to be determined to ensure that sufficient volume is available to store the projected incremental volumes of tailings material, as well as the projected volumes of waste material from final reclamation of the Mill facility, based on the approved Reclamation Plan. This evaluation will be performed by the Mill Manager, or his designee, and approved by the President of IUSA, or his designee.

The procedure for determining whether there is sufficient capacity is described as follows and documented on the attached Tailings Capacity Form.

2.1 For the first evaluation, the base volume ("BV") available will be based on the capacity stated in the Tailings Capacity Evaluation report submitted to the NRC May 15, 2000 (a copy of which is attached). For each subsequent evaluation, the previous evaluation will produce a remaining tailings capacity value, which will become the BV.

2.32.2 Mill Management will maintain a Tailings Capacity Evaluation Record (~~"TECR"~~) ("TCER") book, in which all evaluation forms and supporting ~~documentation~~ calculations will be maintained. Refer to the TECR to obtain the BV value to be used in each subsequent evaluation.

No.: Draft-4 Rev. No.: 0 Date: August 11, 2000	INTERNATIONAL URANIUM (USA) CORPORATION STANDARD OPERATING PROCEDURES Title: Tailings Capacity Evaluation	Page 1 of 2	
No.: PBL-3 Rev. No.: R-0 Date: <u>September 25,</u> <u>2000</u>	<u>INTERNATIONAL URANIUM (USA) CORPORATION</u> <u>STANDARD OPERATING PROCEDURES</u> Title: Tailings Capacity Evaluation	Page 2 of 2	

- 2.3 The volume of tailings discharged to the active tailings cells between the date of the BV and the evaluation date will be estimated based on the Mill's production reports. |
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- 2.6 The BV, minus the quantities in items 2.3, 2.4 and 2.5 above, will become the current tailings capacity. This number will be used as the BV (item 2.1 above) for the subsequent evaluation.
- 2.7 The amount of alternate feed material or conventional ore committed to be processed and deposited into the tailings system will be summarized. The maximum projected quantities of material will be listed by supplier and stated in dry tons, i.e. less the estimated moisture content.
- 2.8 The sum of the quantities estimated in item 2.7 above, will be subtracted from the current tailings capacity calculated in item 2.6 above, to determine the remaining capacity available. |



INTERNATIONAL
URANIUM (USA)
CORPORATION

Independence Plaza, Suite 950 • 1050 Seventeenth Street • Denver, CO 80265 • 303 628 7798 (main) • 303 389 4125 (fax)

December 18, 2000

VIA FACSIMILE AND OVERNIGHT MAIL

Mr. Philip Ting, Branch Chief
Fuel Cycle and Safety and Safeguards Branch
Division of Fuel Cycle Licensing
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
2 White Flint North
11545 Rockville Pike, Mail Stop T-7J9
Rockville, MD 20852

Re: Supplemental Information Regarding April 12, 2000 Amendment Request to Process an Alternate Feed Material from W.R. Grace at the White Mesa Uranium Mill
Source Material License SUA-1358

Dear Mr. Ting:

International Uranium (USA) Corporation ("IUSA") hereby submits the enclosed final procedure, following IUSA discussions with NRC staff regarding the subject license amendment request. As indicated in our transmittal of the draft procedure on December 15, 2000, this procedure is submitted in response to the NRC's request that IUSA provide specific practices that would be applied to management of the material from the W.R. Grace facility; however, this procedure is intended to be applied to acceptance of any alternate feed material(s) which IUSA determines to potentially contain levels of thorium that require that special procedures, over and above those required for conventional ores or other alternate feed materials, be applied.

Based on our discussion today with Mr. von Till of NRC Staff, IUSA understands that the proposed draft procedure was acceptable to NRC; therefore, IUSA is transmitting the final version of the SOP at this time. IUSA looks forward to your staff's completion of reviewing the W.R. Grace amendment request. As always, I can be reached at 303.389.4131.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michelle R. Rehmann', written over a horizontal line.

Michelle R. Rehmann
Environmental Manager

Mr. Philip Ting
December 18, 2000
Page 2 of 2

Attachment

cc: Ronald E. Berg
William N. Deal
David C. Frydenlund
Ron F. Hochstein
William Sinclair/UDEQ
William von Till/NRC

No.: PBL-XX Rev. No.: R-0 Date: December 18, 2000	INTERNATIONAL URANIUM (USA) CORPORATION STANDARD OPERATING PROCEDURES Title: High Thorium Content Ore Management	Page 1 of 8
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1.0 Purpose

The following procedure applies to acceptance of alternate feed material(s) which International Uranium (USA) Corporation (IUSA) determines to potentially contain levels of thorium that require that special procedures be followed, which are over and above those required for conventional ores or other alternate feed materials. Potential alternate feed materials undergo pre-acceptance evaluation by the IUSA ALARA Committee. Material(s) which the ALARA Committee determines require such special procedures will be designated as "High Thorium-Content" (or, "HTC") materials. This procedure may be amended, subject to approval by IUSA's Safety and Environmental Review Panel (SERP) from time to time, as appropriate to incorporate information and results obtained from the evaluation of health physics surveys, monitoring and controls implemented pursuant to keeping radiological exposures to employees, the public and the environment As Low As Reasonably Achievable (ALARA).

The methods set forth in this Standard Operating Procedure (SOP) are based on the assumption that the HTC material(s) will be delivered to the White Mesa Mill in 20-ton intermodal containers (IMCs). Should the delivery method be modified, IUSA will revise this SOP to address the selected mode of delivery.

2.0 Ore Receiving

For material receiving procedures, see Section 2.0 of White Mesa Mill SOP PBL-1, rev. No. R-1, *Intermodal Container Acceptance, Handling and Release*.

3.0 Ore Dumping

1. After the IMC has been dropped off in the Restricted Area, connect the Bartlett tipper to the chassis with a loaded IMC and transport across the truck scales. After weighing the IMC, move the tipper and chassis onto the ore storage pad.
2. Enter the loaded weight of the IMC on the IMC SWT.
3. Remove the tarp on the back of the IMC and open the tailgate.
4. Dump the material in the IMC onto the ore storage pad.
5. After all material has been removed from the IMC, transport the empty IMC back across the scales for an empty weight.
6. Record the empty weight on the appropriate IMC SWT.
7. At the end of each day, turn in outbound SWT to Mill Records Manager.

No.: PBL-XX Rev. No.: R-0 Date: December 18, 2000	INTERNATIONAL URANIUM (USA) CORPORATION STANDARD OPERATING PROCEDURES Title: High Thorium Content Ore Management	Page 2 of 8
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8. The Mill Records Manager will fill out a Daily Materials Receipts form to obtain the net weight of the material in each IMC.
9. After weighing the IMC, the Bartlett tipper will deposit the IMC in a designated area, within the Restricted Area, for decontamination.
10. Use a front-end loader or similar equipment to push material into the designated ore lot pile.
11. Stockpile size will not exceed 200 tons or 10 containers.
12. Once an ore lot pile is complete, label the pile with the appropriate ore lot number, and cover with reinforced plastic.
13. Gross alpha air sampling will be performed continuously, as indicated in Section 7.1(6) of this SOP, during initial phases of material receipt in order to determine the exact frequency of monitoring and the required PPE to be used. A Radiation Work Permit (RWP) will be issued during the initial receipt of HTC feed material(s). The RWP will list the health physics controls, required personal protective equipment, monitoring, and survey requirements necessary to assess the radiological exposure potential to employees operating under the RWP. The air sampling data collected, as described in Section 7.1 of this SOP, will also be among the data used to ensure that the stabilization methods listed below are adequate.
14. Dust suppression measures will include the following:
 - a. Application of stabilizing agent(s) to the piles (for example magnesium chloride or similar material), either prior to or in addition to being covered.
 - b. All piles will be wet down at least once per day until such time that they are covered.
 - c. All completed stockpiles will be covered with reinforced plastic.
 - d. All stockpiles will be inspected at least once per day to ensure the integrity of the covering.
 - e. In the event of wind speeds in excess of 20 MPH, all dumping activities will cease **immediately**.

4.0 Radiation Monitoring during Ore Processing

Due to the likelihood of higher concentrations of thoron and other radiological dangers during HTC ore processing, the following monitoring methodologies will be followed

No.: PBL-XX Rev. No.: R-0 Date: December 18, 2000	INTERNATIONAL URANIUM (USA) CORPORATION STANDARD OPERATING PROCEDURES Title: High Thorium Content Ore Management	Page 3 of 8
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while processing HTC mill feed. Based upon results of monitoring and dose calculations, recognizing that there may be a potential for higher than normal radiological exposures, the Mill Radiation Safety Officer (RSO) may recommend that personnel be rotated from area to area periodically in order to reduce potential exposure.

As soon as the results of the monitoring activity, conducted in accordance with the conditions indicated by the RWP, have been evaluated, the added radiological surveys applicable to the particular HTC mill feed will be established, communicated to the Radiation Safety Technicians (RSTs), conducted, and documented. Irrespective of the added surveys selected for the particular HTC feed, the following radiological surveys will be performed routinely for the duration of the processing of HTC materials.

4.1 Area Airborne Sampling

During initial receipt of HTC materials, weekly area airborne sampling will be conducted in the areas of the Mill listed below. A twenty-four hour air sample will be collected at a flow rate of 40 liters per minute, or greater. After sufficient data has been collected and reviewed by the RSO and ALARA Committee, area airborne sampling frequency may be reduced to once every two weeks during the processing of HTC mill feed.

1. Ore feed area.
2. Leaching area.
3. Central Control Room.
4. Solvent Extraction Building.
5. Precipitation area.
6. Yellowcake drying area.
7. Yellowcake packaging area.

The above samples will be analyzed for gross alpha.

4.1.4 DAC Determination

A composite feed sample will be analyzed for radioscopic composition for U-Nat and Th-Nat. A composite of two air samples from each of the above locations will also be analyzed for U-Nat and Th-Nat. The composite air sample results will be compared to the feed material results. These data comparisons will be used by the RSO to establish the appropriate derived air concentration (DAC) for each location listed above, and the U-Nat to Th-Nat ratio for analysis using gross alpha counting. If gross alpha counting of air samples using the U-Nat to Th-Nat ratios indicate an airborne radioactive dust concentration of 25% of the thorium DAC or Uranium DAC, or the geometric mean of the mixture, in any of the areas listed above, then the air sample frequency will be increased to weekly in those areas only.

No.: PBL-XX Rev. No.: R-0 Date: December 18, 2000	INTERNATIONAL URANIUM (USA) CORPORATION STANDARD OPERATING PROCEDURES Title: High Thorium Content Ore Management	Page 4 of 8
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4.2 Breathing Zone Sampling

- a. Breathing zone air samples will be collected once per month on select individuals who perform routine work tasks associated with processing operations.
- b. Breathing zone air samples will be collected from individuals who perform work tasks under an RWP.
- c. In addition to the above sampling under (a) and (b), further breathing zone samples will be collected from individuals at the discretion of the RSO.

4.3 Environmental Sampling

- a. Continuous air samples will be collected on a weekly basis in the following areas during processing of HTC feed material.
 1. Ore pad area.
 2. Tailings area.

4.4 Tailings Management

Tailings resulting from processing HTC alternate feed material will be deposited in an area of the tailings system that will ensure that the material is fully submerged beneath pond liquid and/or tailings slurry from non-HTC alternate feed materials until such time as the first layer of interim cover or random fill is placed on the tailings system. This will minimize the potential for thoron gas to escape to the atmosphere. Mill Management and the RSO will coordinate efforts to ensure that operations personnel are provided direction regarding placement of HTC tailings. In addition, the weekly tailings inspections reports will document the placement of HTC tailings during the preceding week.

4.5 Surveys For External Radiation

- a. All employees working with HTC material will wear a personal TLD badge. The badges will be collected quarterly and the results entered on individual exposure forms.
- b. Beta/gamma dose rate measurements will be performed weekly in all areas of the mill operations. These data will be used to perform monthly dose rate calculations.
- c. Monthly TLD badges will be worn by individuals who perform work tasks that are anticipated to exhibit the highest potential dose

No.: PBL-XX Rev. No.: R-0 Date: December 18, 2000	INTERNATIONAL URANIUM (USA) CORPORATION STANDARD OPERATING PROCEDURES Title: High Thorium Content Ore Management	Page 5 of 8
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rate exposures, such as those assigned to RWP tasks and workers performing initial receipt and handling of the HTC material, prior to establishment of material-specific DAC values.

4.6 Surveys for Radon-222, Radon-220 and Their Daughters

Monthly measurements of radon daughter concentrations for both Ra-222 and Ra-220 will be conducted in those areas of the Mill listed above in Section 4.1 of this SOP. If radon daughter concentrations from either the uranium or thorium parent is greater than 25% of the limit (0.08 working level for Ra-222 or 0.25 working level for Ra-220) the sampling frequency will be increased to weekly in areas where these levels are routinely encountered. All ventilation systems in the Mill will be checked daily by the radiation safety staff.

5.0 Decontamination and Release of IMCs

For intermodal release procedures, see White Mesa Mill Standard Operating Procedure PBL-1, rev. No. R-1, *Intermodal Container Acceptance, Handling and Release*.

6.0 Hazard Identification and Safety

In addition to the usual safety procedures required for work at the Mill, the following safety procedures are to be followed for projects involving HTC materials.

6.1 Required Personnel Protective Equipment (PPE)

In all areas of the Mill covered by this procedure, hard hats, safety glasses and steel-toed shoes are required as a minimum. These must be worn in all areas of the Mill with the exception of the Administration Building.

The following are **required** while handling HTC material.

1. Coveralls. **Coveralls must be laundered on a daily basis!**
2. Leather or rubber gloves.
3. Rubber Boots or Booties.
4. Respiratory protection as directed by the RSO or specified in an RWP. Respiratory protection will be used during initial receipt and handling of HTC feed material (s) and until material-specific DAC values are set. In addition, all individuals who work in areas where there is a likelihood that the airborne concentration DAC

No.: PBL-XX Rev. No.: R-0 Date: December 18, 2000	INTERNATIONAL URANIUM (USA) CORPORATION STANDARD OPERATING PROCEDURES Title: High Thorium Content Ore Management	Page 6 of 8
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limits for either uranium, radon, thoron or thorium will exceed 25% of the DAC will be required to wear respiratory protection, as directed by the RSO (See section 7.1.2), below.

6.2 Industrial Hazards and Safety

1. Use caution when chassis are backing onto the Ore Pad.
2. Ensure that all personnel within 50 feet of the area where the IMC is hooked up to the Bartlett tipper are aware that dumping is about to commence.
3. Bartlett tipper operators must use caution during the dumping process. Move at least 25 feet away from the rear of the IMC during the initial dumping operation.
4. Do not place any part of your body inside the IMC when the chassis is being tipped and the tailgate is open. The IMC could be lowered or accidentally fall at any time, which would cause the tailgate to close rapidly and result in injury. Only work under the tailgate after it has been properly blocked open.
5. Be aware of high-pressure wash water.
6. When the crane is in operation, make sure all personnel, except the persons in charge of the tag lines, are 50 feet away from the IMC being moved. The persons in charge of the tag lines should **never** be underneath the IMC that is being moved.
7. Be aware of slippery conditions on the ore pad during periods of inclement weather.
8. Be aware of the potential for ice build-up on and around the decontamination pad during periods of cold weather.
9. Use caution when entering or exiting equipment. Be sure to use the ladders and hand rails. **Do not jump off of the equipment.**

7.0 Radiological and Environmental Concerns

Environmental radiation monitoring is routinely performed at the White Mesa Mill at sufficient frequency (quarterly and semiannually) that any potential impact to the public and or the environment would be identified. In addition to the environmental air monitoring samples collected continuously at the Mill and analyzed for radioisotopes U-

No.: PBL-XX Rev. No.: R-0 Date: December 18, 2000	INTERNATIONAL URANIUM (USA) CORPORATION STANDARD OPERATING PROCEDURES Title: High Thorium Content Ore Management	Page 7 of 8
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Nat, Ra-226, Th-230 and Pb-210, the air samples collected during receipt, handling, processing, and disposal of HTC materials will also be analyzed for Th-232, Ra-228 and Th-228. The RSO will evaluate the resulting data and compare the results to their respective effluent concentration limits contained in 10 CFR Part 20, Appendix B, and will retain records of these evaluations at the Mill for NRC inspection.

7.1 Airborne Radiation Protection

1. Until otherwise indicated by air sampling results, and agreed upon by the Mill RSO and the ALARA Committee, the areas of the ore storage pad used for HTC material will be posted as either a "**Radiation Area**" and/or "**Airborne Radioactivity Area**". These areas will be posted with caution signs in accordance with 20.1902.
2. Subsequent to approvals by the RSO and ALARA Committee for reduced posting, if, based on air sampling, an area exhibits 25% of the DAC limits for either uranium or thorium, it will be posted "**Respiratory Protection Required**".

All personnel involved with material handling during a project involving HTC material will be required to wear a **full face respirator**, until such time that review of the air samples by the RSO and ALARA committee indicate that this level of protection is not needed. Employees will be notified of any changes to the respiratory protection requirements during an HTC project by memorandum.

- a. All individuals who work in areas where there is a likelihood that the airborne concentration DAC limits for either uranium, radon, thoron or thorium will exceed 25% of the DAC will be required to wear respiratory protection. As directed by written memorandum from the RSO, one of the following respirators will be selected:
 - i. Full Face Respirator
 - ii. Powered Air Purifying Respirator
 - iii. Self Contained Breathing Apparatus (SCBA)
3. Personal air monitoring will be conducted as per Section 1 of the White Mesa Mill Radiation Protection Manual and Section 4.2 above.
4. Continuous air sampling will be conducted around the perimeter of the ore pad. At the onset of an HTC project, sample filters from the continuous air samplers will be collected and analyzed for gross alpha, Ra-222 and Ra-220 on a weekly basis. This frequency

No.: PBL-XX Rev. No.: R-0 Date: December 18, 2000	INTERNATIONAL URANIUM (USA) CORPORATION STANDARD OPERATING PROCEDURES Title: High Thorium Content Ore Management	Page 8 of 8
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may be relaxed upon approval of the site RSO and the ALARA Committee.

5. Real time thoron monitors will be placed around the periphery of the ore pad for the duration of the HTC project. These monitors will be changed out according to the frequency recommended by the manufacturer and analyzed for Ra-220.

7.2 Urinalysis

1. All personnel involved with the dumping, stockpiling or processing of HTC content material and RST's involved in monitoring described in this SOP will submit a urine sample every two weeks at a minimum, or at a greater frequency if so directed by the provisions of an RWP. These samples will be analyzed for uranium and thorium content. Evaluation and corrective actions will be conducted pursuant to guideline provisions contained in Regulatory Guide 8.22 *Bioassay at Uranium Mills*. In vivo lung counting may be implemented if circumstances suggest an overexposure or uptake of either isotope has occurred. In vivo counting will be conducted at the discretion of the RSO and ALARA Committee.

7.3 Personal Hygiene

1. All personnel involved with the dumping, stockpiling or processing of HTC material will be required to wear designated coveralls. These coveralls will be changed and laundered on a daily basis.
2. All personnel involved with the dumping stockpiling or processing of HTC material will be required to shower before leaving the restricted area at the end of their shift.
3. All personnel will survey their hands, boots and clothing for surface contamination prior to eating or leaving the restricted area.

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

ATOMIC SAFETY AND LICENSING BOARD PANEL

Before Administrative Judges:
Ann Marshall Young, Presiding Officer
Dr. Charles N. Kelber, Special Assistant

IN THE MATTER OF:

INTERNATIONAL URANIUM (USA)
CORPORATION

(Source Material License Amendment)

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Docket No. 40-8681-MLA-8

ASLBP No. 00-782-08-MLA

February 8, 2001

CERTIFICATE OF SERVICE

I hereby certify that I caused true and complete copies of the foregoing LETTERS DATED NOVEMBER 16, 2000 AND DECEMBER 18, 2000 PURSUANT TO THE PRESIDING OFFICER'S FEBRUARY 6, 2000 ORDER in the above-captioned matter to be served by first-class, postage prepaid mail and also by overnight mail to the individuals indicated by an asterisk on this 8th day of February, 2001 to:

The Honorable G. Paul Bollwerk, III
Chief Judge
U.S. Nuclear Regulatory Commission
Two White Flint North
11545 Rockville Pike
Mail Stop T-3 F23
Rockville, MD 20852

U.S. Nuclear Regulatory Commission
Office of the General Counsel
11555 Rockville Pike
Rockville, MD 20852

Office of the Secretary
Attn: Rulemakings and
Adjudication Staff
One White Flint North
11555 Rockville Pike
U.S. Nuclear Regulatory Commission
Rockville, Maryland 20852

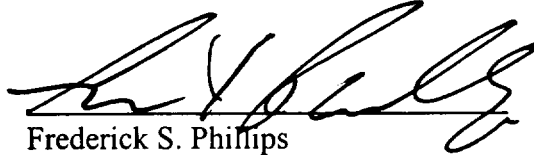
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Office of Rulemakings and
Adjudication
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Sarah M. Fields *
P.O. Box 143
Moab, UT 84532

Administrative Judge *
Ann Marshall Young
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Mail Stop T-3-F23
Washington, D.C. 20555-0001

Administrative Judge
Dr. Charles N. Kelber
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