



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064**

July 18, 2002

A. Fred Dohmann, General Manager
Fansteel, Incorporated
Number Ten Tantalum Place
Muskogee, Oklahoma 74403

SUBJECT: NRC INSPECTION REPORT 040-07580/2002-01

Dear Mr. Dohmann:

This refers to the inspection conducted on June 17-19, 2002, at Fansteel's rare earth recovery facility in Muskogee, Oklahoma. This inspection was an examination of activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of activities, and interviews with personnel. A preliminary exit briefing was presented to you at the conclusion of the onsite inspection, and a final exit briefing was telephonically held with your radiation safety officer on July 18, 2002. The enclosed report presents the results of that inspection.

Based on the results of this inspection, the NRC has determined that two violations of NRC requirements occurred. The first violation involved your failure to submit a required report to the NRC in a timely manner. The second violation involved your staff's failure to follow license application requirements. These violations of the license are being treated as a Non-Cited Violations (NCV), consistent with Section VI.A of the Enforcement Policy. The violations are not being cited, in part, because your staff identified the violations and issued condition reports to review the causes of the violations. The NCVs are described in the enclosed inspection report. If you contest the violations or the significance of the violations, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001, with a copy to the Regional Administrator, Region IV, and the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Fansteel, Inc.

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Should you have any questions concerning this inspection, please contact Mr. Robert J. Evans at (817) 860-8234 or Dr. D. Blair Spitzberg at (817) 860-8191.

Sincerely,

/RA by DBSpitzberg Acting for/

Dwight D. Chamberlain, Director
Division of Nuclear Materials Safety

Docket No.: 040-07580

License No.: SMB-911

Enclosure:

NRC Inspection Report
040-07580/2002-01

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Fansteel, Inc.

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ENCLOSURE

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket No.: 040-07580

License No.: SMB-911

Report No.: 040-07580/2002-01

Licensee: Fansteel, Inc.

Facility: Muskogee Plant

Location: Muskogee, Oklahoma

Inspection Dates: June 17-19, 2002

Inspector: Robert J. Evans, PE, CHP, Senior Health Physicist
Fuel Cycle & Decommissioning Branch

Accompanied By: R. R. Munoz, Health Physicist (Inspector In-training)
Fuel Cycle & Decommissioning Branch

Thomas L. Fredrichs, Project Manager
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Division of Waste Management
Office of Nuclear Material Safety and Safeguards

Approved By: D. Blair Spitzberg, Ph.D., Chief
Fuel Cycle & Decommissioning Branch

Attachment: Supplemental Inspection Information

EXECUTIVE SUMMARY

Fansteel, Inc. Muskogee Plant
NRC Inspection Report 040-07580/2002-01

This inspection reviewed the site status, management organization and controls, radiation protection program, transportation activities, environmental protection program, and followup of a previous inspection finding.

Management Organization and Controls

- The licensee's staffing level was adequate to maintain the plant in a shutdown condition and to ensure compliance with applicable regulations and license conditions (Section 1).

Radiation Protection

- The licensee had implemented a radiation protection program that met the requirements established in 10 CFR Part 20 and the license, with one exception. A Non-Cited Violation was identified involving the failure to follow license application requirements. Specifically, plant workers conducted activities without a required special radiation work permit and respiratory protection equipment, resulting in an uptake of radioactive material to the individuals (Section 2).
- Site tours confirmed that security and control of the radioactive material were adequate. Occupational exposures were below regulatory limits. Training was provided to plant workers, and special work permits were used for maintenance activities involving radioactive material. Contamination control efforts were effective. No material had been released offsite with contamination above licensed limits (Section 2).

Inspection of Transportation Activities

- The licensee shipped several different types of product to both licensees and non-licensees. A records review indicated that the material was properly shipped (Section 3).

Environmental Protection

- The environmental and effluent monitoring programs were implemented in accordance with regulatory and license requirements. No sample result exceeded any regulatory or reporting limit, with one exception involving a May 2001 sump sampling event (Section 4).
- A Non-Cited Violation was identified involving the licensee's failure to submit a required report to the NRC in a timely manner (Section 4).

Followup

- A previous Inspection Followup Item related to the organizational structure was left open. The future organizational structure depends on the licensee's long-term plans for the plant (Section 5).

Report Details

Summary of Site Status

From 1958 until 1989, the Fansteel facility produced tantalum metal and columbium oxide extracted from ore and slag feedstock. The NRC issued a source material license to Fansteel during 1967 authorizing the possession of thorium and uranium contained in the raw material being processed in the plant. The facility ceased operations during December 1989.

By application dated January 25, 1995, Fansteel requested a license amendment to authorize the onsite processing of pond residues containing precious metals. This material was designated as work-in-progress (WIP) material. The licensee planned to recover the rare metals in the WIP material while simultaneously reducing the total volume of radioactive waste contained in the material. The licensee also planned to recover calcium fluoride (CaF_2) material from existing onsite waste treatment Ponds 6-9.

During March 1999, the NRC authorized Fansteel to commence with residue recovery operations. The licensee initiated a phased restart of the plant on April 1, 1999. Since April 1999, the licensee processed roughly 50 tons of pond material during preoperational testing of plant equipment and process flowpaths.

During mid-November 2001, the licensee became aware that its financial situation may require a change in plant status. On November 19, 2001, Fansteel issued a press release announcing that it was contemplating the filing of a voluntary petition for protection under Chapter 11 of the United States Bankruptcy Code. At that time, Fansteel suspended operations at its Muskogee facility. On January 15, 2002, Fansteel filed voluntary petitions for reorganization under Chapter 11 of the U.S. Bankruptcy Code. Formal notification of the bankruptcy filing was sent to the NRC pursuant to 10 CFR 40.41(f) by letter on the same day.

The plant was in the suspended operations mode during the inspection. The facility had been in this mode since November 2001. Plant systems being maintained in service included the groundwater treatment system, waste water treatment plant, plant boilers, air compressors, and building utilities (electricity, heat, water). The plant systems had been drained of WIP material. The material was bagged and placed in storage in the former sodium reduction building. Waste material containing source material previously stored outdoors behind the plant was also relocated into the sodium reduction building. All CaF_2 material was returned to onsite Ponds 8 and 9 via the waste water treatment system.

Hydrofluoric acid and ammonium hydroxide material was being held pending sale to third-party entities. Sodium hydroxide material remained onsite for use, as needed, in waste water treatment operations. Sulfuric acid material also remained onsite but may be neutralized in the near future. The solvent extraction organics material was removed from the process circuit and was being stored in the plant in plastic barrels. With the solvent extraction material in storage, the licensee planned to remove the carbon dioxide fire suppression system from operation and place it in long-term lay up. Finally, the void that was previously located in Pond 2, the pond that WIP material was excavated from for preoperational testing, had been lined and filled with clean soil.

1 Management Organization and Controls (88005)

1.1 Inspection Scope

The inspector reviewed the licensee's organizational structure and management controls to determine whether functional responsibilities had been clearly established and whether controls were in place to ensure license and regulatory compliance.

1.2 Observations and Findings

During November-December 2001, in response to its financial status, the licensee reduced the number of onsite personnel from 38 to 11. At the time of this inspection, the number of onsite personnel was eight. The individuals remaining included the site general manager, radiation safety officer, radiation technician, plant chemical engineer, operations manager, documentation control coordinator/administrative assistant, and two crew leaders.

Since the previous inspection, the administrative assistant left the site, and the positions of document control coordinator and administrative assistant were merged into one position. The radiation safety technician left the site during April 2002, and the position was filled with a former plant operator. Two plant operators left the site, and the licensee had not refilled the positions at the time of this inspection. Contract workers included a project engineer, a custodian, and a groundskeeper. In addition, the licensee still had a contract security force in place. This organizational structure was considered a short-term staffing plan and no additional layoffs were planned in the immediate future.

During the inspection, the plant was in the suspended operations mode. The staff was being used to maintain continued operation of the waste water, groundwater, and environmental monitoring systems. The inspector noted that key positions, including the radiation protection staff, were filled with qualified individuals. The staffing was determined to be adequate to maintain compliance with regulatory and license requirements while the plant remained shut down.

The licensee stated during the inspection that it would submit an updated organizational chart to the NRC in the near future as part of the license renewal process. Whether the organizational structure permanently changes, depends on the licensee's eventual decision regarding its long-term plans for the facility.

1.3 Conclusions

The licensee's staffing level was adequate to maintain the plant in a shutdown condition and to ensure compliance with applicable regulations and license conditions.

2 Radiation Protection (83822)

2.1 Inspection Scope

The inspector examined the licensee's radiation protection program for compliance with the license and 10 CFR Part 20 requirements.

2.2 Observations and Findings

a. Contamination Control

The inspector reviewed the contamination control program for compliance with license application requirements. The licensee conducted contamination surveys using approved procedures. Adequate protective clothing and contamination control practices were evident in the plant. The inspector did not have the opportunity to observe workers conduct personal contamination and equipment release surveys on vehicles or other material leaving the restricted area. Records reviewed for the period covering December 28, 2000, through May 30, 2002, indicated that nothing had been released from the site with contamination levels above the release limits. Swipe surveys included zone transfer, free release, onsite, biweekly and incoming survey categories.

Section 3.5.3 of the license application states, in part, that uniforms are surveyed for alpha contamination prior to pick up by a laundry service. The inspector reviewed the program for performing contamination surveys on anti-contamination coveralls before being shipped to an offsite laundry processor. The inspector noted that coverall surveys were being conducted in accordance with an approved procedure. The radiation protection technician stated that surveys were conducted on every coverall prior to release to an offsite laundry facility. Records indicated that no coveralls had been released from the site with contamination above the licensee's release limits.

Both fixed and loose radioactivity had been routinely measured throughout the site. Smears for loose radioactivity were counted with calibrated portable and laboratory instrumentation. No significant radiation or surface contamination levels were encountered by the licensee within the restricted area. Surface contamination surveys did not detect any contamination levels above 1000 disintegrations per minute per 100 square centimeters. The licensee was noted to have a low threshold (below 100 disintegrations per minute per swipe sample) for performing decontamination of areas exhibiting removable radioactivity.

b. Radiation Safety Training

The licensee's radiation protection training program was reviewed to determine compliance with 10 CFR 19.12 and Section 2.3, "Training," of the license application. Section 2.3 requires that all new employees receive general employee radiation safety training including temporary and contract employees. A review of 2001 training documents such as lesson plans and student test results indicated that all personnel had been trained and tested in accordance with the license application and the

requirements of 10 CFR 19.12. Employees received annual refresher training. An interview with a radiation worker confirmed the adequacy of the training program.

c. Occupational Exposures

Thermoluminescent dosimeters were assigned to all workers involved with activities where radioactive material was present. The thermoluminescent dosimeter results for January 2001-March 2002 were reviewed. One individual received 11 millirems of exposure during the second quarter of 2001. All other sample results were zero.

The licensee monitored selected workers for internal exposures. During June 2001, two individuals experienced an uptake of radioactive material. The workers were conducting cleanup of a restricted area of the plant without respiratory protection equipment and without specific authorization through a special work permit. As corrective actions, the licensee conducted bioassay sampling to determine if an uptake had occurred and plant supervision initiated constructive discipline of the workers involved.

The two workers supplied fecal samples to ascertain the quantities of radioactive material present in the body. The sample results indicated that the two individuals had experienced an uptake of radioactive material. Using the REMIT computer code, the licensee calculated and assigned a total effective dose equivalent of 91 millirems and 71 millirems, respectively, to the two workers. The total organ dose equivalent to the maximum exposed organ (bone) was 2077 millirems and 441 millirems, respectively. Per 10 CFR 20.1201, the annual total effective dose equivalent limit is 5000 millirems. The annual organ dose limit, defined as the sum of the deep dose equivalent and the committed dose equivalent to any individual organ or tissue other than the lens of the eye, is equal to 50,000 millirems. Neither worker exceeded these two regulatory limits.

The workers' failure to follow license application requirements by conducting activities without a special radiation work permit and without respiratory protection equipment was a violation of License Condition 10 (40-7580/0201-01). As a result of the workers' failure to follow plant procedures, both individuals experienced an uptake of radioactive material. However, the licensee identified the situation, took immediate corrective actions including disciplining the workers, issued a condition report to investigate the incident, and conducted special bioassay sampling. Accordingly, this non-repetitive, licensee-identified and corrected violation is being treated as a Non-Cited Violation, consistent with Section VI.A.8 of the NRC Enforcement Policy.

d. Radiation Work Activities and Special Work Permits

The licensee had a special work permit program in place. During this inspection, the inspectors reviewed selected special work permits for the radiological work activities being conducted and the potential hazards involved. The work included the replacement of a pump motor and tree cutting inside an onsite pond. The work had been conducted without significant incident. Discussions with operators indicated that they possessed sufficient knowledge of radiation hazards present for their work assignments. Adequate protective clothing and contamination control practices were evident.

e. Air Sampling

Air sampling was conducted weekly at three locations identified by the radiation safety officer as locations that had the potential for airborne contamination. One sample point was located in the Chem C building while the remaining two locations were in the Chem A building. Personnel air sampling was also conducted for individuals assigned work in areas having a significant potential for airborne contamination. The inspector reviewed air sampling records and noted a downward trend in air sample results following suspension of plant operations during the Fall of 2001.

Since the previous inspection, the licensee discontinued the use of five fixed area samplers. All five were located in the Chem A building. The licensee discontinued these samplers because the plant had suspended operations. The licensee continued to operate the three remaining area samplers. The inspector concluded that the license allowed the licensee to discontinue the use of these five samplers until operational activities resumed.

The air sampling action level was exceeded three times since plant shutdown. All three exceedances occurred during December 2001. The first event was detected by an area sampler. No work was in progress at that time and no exposure was assigned to any individual. The remaining two events involved maintenance operations on the ribbon blender. In these two cases, plant personnel were wearing half-face respirators and were conducting the work under a special work permit. By procedure, a condition report was issued to investigate the three exceedances.

f. Radiation Protection Program Reviews

Annual program reviews are required by 10 CFR 20.1101(c). The licensee conducted the 2001 annual review on March 5, 2002. The review appeared to be thorough and included all program areas. Portions of the 2001 review had been conducted by a third-party contractor. The respiratory protection and air sampling programs were reviewed by a consultant during August-September 2001.

g. Site Tours

Site tours were conducted to observe activities in progress. The tours included all buildings, ponds, and radioactive material storage areas. Radiological surveys were conducted using an NRC issued Ludlum Model 19 MicroRoentgen meter (NRC No. 015540, calibrated to radium-226). Site tours confirmed that all areas with radiological materials, including the ponds, french drain system, and the Chem A, Chem C and sodium reduction buildings were properly maintained and posted with "Caution, Radioactive Material" signs as appropriate. The highest exposure rates were observed at the sodium reduction building, the place where WIP material was being stored. This building was not routinely traversed by plant personnel. The general area exposure rates in the plant were noted to be at or near background levels.

Site security was provided by a security force and by site personnel during regular business hours. Access to the site was limited by locked gates during non-business

hours to prevent unauthorized access to the facility. The site perimeter fence was in good condition and properly posted. All radioactive material storage areas were secured and controlled within the site boundary in accordance with the requirements of 10 CFR 20.1801. All storage areas displayed proper radiological postings as required by 10 CFR 20.1902(e).

2.3 Conclusions

The licensee had implemented a radiation protection program that met the requirements established in 10 CFR Part 20 and the license, with one exception. A Non-Cited Violation was identified involving the failure to follow license application requirements. Specifically, plant workers conducted activities without a required special radiation work permit and respiratory protection equipment, resulting in an uptake of radioactive material to the individuals. Site tours confirmed that security and control of the radioactive material were adequate. Occupational exposures were below regulatory limits. Training was provided to plant workers, and special work permits were used for maintenance activities involving radioactive material. Contamination control efforts were effective because no material had been released offsite with contamination above licensed limits.

3 **Inspection of Transportation Activities (86740)**

3.1 Inspection Scope

The inspector reviewed the licensee's program for the shipment and transportation of potentially radioactive material.

3.2 Observations and Findings

The raw material and product sampling requirements are provided in Section 3.5.11 of the license application. All products shipped offsite have to be sampled. The radioactive material concentrations have to be below licensed action levels if shipped to non-NRC licensed facilities.

Since the last inspection, the licensee shipped 14 samples to offsite entities. Some of the recipients were non-licensees, others were NRC or state licensees. The shipped material included tantalum product, uranium/thorium raffinate precipitate, CaF₂ material, and WIP samples from different stages of the process circuit. The inspector reviewed the documentation associated with each shipment and concluded that the shipped material complied with the requirements of the license application.

Copies of shipping papers were reviewed. The shipping papers were in compliance with regulatory requirements. The documentation indicated that the product shipped as radioactive material to other licensees was shipped in accordance with applicable regulatory requirements. Material shipped to non-licensees was confirmed to be below radioactive material content levels defined in the license.

3.3 Conclusions

The licensee shipped several different types of product to both licensees and non-licensees. A records review indicated that the material was properly shipped.

4 Environmental Protection (88045)

4.1 Inspection Scope

The inspector reviewed the licensee's program to control, monitor, and quantify releases of radioactive material to the environment to determine if the program was effectively implemented per regulatory and license requirements.

4.2 Observations and Findings

The environmental and effluent monitoring program requirements are specified in Section 3.5 of the license application. The program consisted of liquid effluent monitoring, groundwater monitoring, and air sampling. The inspector examined the licensee's sample results for portions of 2001 and 2002 to determine if radioactive material was being released into the environs of the site.

Plant liquid effluents were discharged from Pond 6 to the Arkansas River through Outfall 001. The liquids were released in batch modes. Since the previous inspection, the licensee released liquids 10 times. The licensee collectively released about 8.3 million gallons of fluid since the last inspection. Samples were collected during each batch release. The fluid was sampled for gross alpha and beta concentrations. The gross alpha and beta action levels, 15 picocuries per liter and 50 picocuries per liter, respectively, were occasionally exceeded. If the action levels were exceeded, the licensee conducted a followup isotopic analysis of the sample. No sample result exceeded the licensed limit for reportability to the NRC. Further, no sample result exceeded the effluent concentration limits provided in Appendix B to 10 CFR Part 20.

Air particulate samples were collected at six locations; four perimeter stations, an offsite (environmental) station, and a background station. The air particulate samples were exchanged weekly and analyzed for gross alpha activity. The sample results for January 2001-May 2002 were reviewed. No sample result exceeded the action level for gross alpha activity. Stack sampling was not conducted since the previous inspection because the calciner had been out-of-service since October 2001.

Radon sampling was conducted at seven locations. The radon canisters were exchanged quarterly. The sample results for January 2001-March 2002 were reviewed. The highest radon concentrations continue to be measured in the sodium reduction building, the location where WIP and waste material were stored. The sample results varied from 18.7-63.3 picocuries per liter with an action level of 30 picocuries per liter. The sodium reduction building remained a posted airborne radioactivity area and all building doors were kept locked at all times. Special authorization was required prior to

personnel entry into the building. All other radon sampling results were at or below 5.2 picocuries per liter.

Groundwater monitoring consisted of sampling 19 wells and 4 sumps. The wells and sumps were sampled quarterly and analyzed for gross alpha and beta concentrations. The wells were also sampled on a semi-annual basis for a number of chemical constituents in accordance with a state permit. The sample results for August 2001-April 2002 were reviewed. Based on a random review, the inspector concluded that the licensee collected the required number of groundwater samples and analyzed the samples for the correct radiological and chemical constituents.

The gross alpha and beta action levels were measured and compared to administrative action levels. If the action levels are exceeded, then the licensee was required to conduct an isotopic analysis of the sample. Selected sample results exceeded the 25 percent action level for uranium isotopes, and condition reports were issued for each exceedance. For the time interval reviewed, no sample result exceeded the respective 10 CFR Part 20, Appendix B, Table II release limit.

During May 2002, the licensee became aware that it had failed to report a groundwater exceedance to the NRC in a timely manner. Sump 2 was routinely sampled on May 16, 2001. The sample results in units of microcuries per milliliter ($\mu\text{Ci/ml}$), were:

Radionuclide	Sample Concentration	Effluent Concentration Limit
uranium-234	4.76 E -06 $\mu\text{Ci/ml}$	3.00 E -07 $\mu\text{Ci/ml}$
uranium-238	5.26 E -06 $\mu\text{Ci/ml}$	3.00 E -07 $\mu\text{Ci/ml}$

Both sample results exceeded the effluent concentration limit by a factor of 10. License Condition 10 references the license application. Section 3.5.6 of the license application states that if the value listed in 10 CFR Part 20, Appendix B, Table II is exceeded by more than 10 times, the licensee is required to submit a report to the NRC within 30 days. The licensee became aware that it had exceeded the reportability limits during September 2001. At that time, an internal condition report was drafted but was not processed pending receipt of a printed copy of the verification report from the sample laboratory.

On May 7, 2002, the radiation safety officer, while conducting an internal review of the groundwater monitoring records, discovered the draft condition report. The radiation safety officer also discovered that the verification report still had not been received and the license-required notification did not occur. The licensee subsequently issued the 30-day report to the NRC on May 31, 2002. The licensee's failure to submit a license-required report to the NRC within the 30-day time limit was a violation of License Condition 10 (40-7580/0201-02).

In response to the missed reporting deadline, the licensee modified its program for tracking elevated sample results. The program now stipulates that a condition report

shall be issued to track elevated sample results immediately upon initial notification, regardless of whether the notification was verbal or written. Accordingly, this non-repetitive, licensee-identified and corrected violation is being treated as a Non-Cited Violation, consistent with Section VI.A.8 of the NRC Enforcement Policy.

In its letter dated May 31, 2002, the licensee concluded that sump concentrations tend to be elevated following periods of reduced pumping activity. During periods of dry weather, the sump fluids tend to evaporate, allowing the chemical and radionuclide constituents to concentrate in the remaining fluid. The inspector conducted a review of the sump sample results to ascertain whether the May 2001 sample results were indicative of a negative trend or were outliers.

The sample results obtained during August 2001 were compared to the May 2001 sample results. The August 2001 sample results were lower by a factor of 100. Further, the total dissolved solids were lower in the August 2001 sample than the May 2001 sample, suggesting that the May 2001 samples were concentrated samples. The licensee pointed out that the french drain system was designed to intercept groundwater, and the water from the sump was processed through the waste water treatment system prior to release offsite. Sump 2 eventually discharges to the Arkansas River through Outfall 001. Based on sampling results, the effluent concentration limits had not been exceeded at this outfall.

The inspector noted that a similar problem had been previously reported to the NRC. On December 7, 1999, the licensee informed the NRC that elevated sample results had been identified in the same sump (Sump 2) for the same radionuclides (uranium-234 and uranium-238) during May 1999. At that time, the licensee confirmed the exceedances using split sampling analyses. The inspector concluded that although uranium concentrations occasionally exceeded the reportability limit in Sump 2, the sample results from Outfall 001 indicate that the effluent concentration limits specified in regulations had not been exceeded.

4.3 Conclusion

The environmental and effluent monitoring programs were being implemented in accordance with regulatory and license requirements. No sample result exceeded any regulatory or reporting limit, with one exception involving a May 2001 sump sampling event. A Non-Cited Violation was identified involving the licensee's failure to submit a required report to the NRC in a timely manner.

5 Followup (92701)

5.1 (Open) Inspection Followup Item 040-07580/9902-01: Submittal of a license amendment request for an organizational change

During a previous inspection, the NRC noted that the licensee's onsite organizational structure was not in agreement with license requirements. Specifically, the position of plant operations manager was split into two positions, plant operations manager-process

and plant operations manager-mining and utilities. Fansteel previously stated that it would submit a license amendment request to the NRC to update the license. This commitment was being tracked in the licensee's open commitment report.

During November 2001, the licensee announced that it may file for bankruptcy during December 2001. At that time, the licensee reduced the onsite workforce from 38 individuals to 11 individuals. During the onsite inspection, the licensee's staff consisted of eight individuals. The licensee stated that it would submit an updated organizational structure to the NRC as part of the upcoming license renewal submittal. Additional review of this Inspection Followup Item will be conducted during a future inspection.

6 Exit Meeting Summary

The inspector reviewed the scope and findings of the inspection during the preliminary exit meeting that was conducted at the conclusion of the onsite inspection on June 19, 2002. A final exit briefing was telephonically held with the licensee on July 18, 2002. The licensee did not identify as proprietary any information provided to, or reviewed, by the inspector.

ATTACHMENT

SUPPLEMENTAL INFORMATION

PARTIAL LIST OF PERSONS CONTACTED

Licensee

C. Adams, Radiation Technician
L. Adams, Document Control Administrator
J. Burgess, Plant Operations Manager
F. Dohmann, General Manager
H. Notzl, Manager, Technical Services
K. Payne, Manager, Regulatory Compliance

INSPECTION PROCEDURES USED

IP 88005	Management Organization and Controls
IP 83822	Radiation Protection
IP 86740	Inspection of Transportation Activities
IP 88045	Environmental Protection
IP 92701	Followup

ITEMS OPENED, CLOSED AND DISCUSSED

Opened

040-07580/0201-01	NCV	Failure to utilize a special radiation work permit and respiratory protection equipment
040-07580/0201-02	NCV	Failure to submit a license-required report to the NRC in a timely manner

Closed

040-07580/0201-01	NCV	Failure to utilize a special radiation work permit and respiratory protection equipment
040-07580/0201-02	NCV	Failure to submit a license-required report to the NRC in a timely manner

Discussed

040-07580/9902-01	IFI	Submittal of a license amendment request for an organizational change
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LIST OF ACRONYMS USED

CaF ₂	calcium fluoride
CFR	Code of Federal Regulation
IFI	Inspection Followup Item
IP	Inspection Procedure
μCi/ml	microcuries per milliliter
NRC	Nuclear Regulatory Commission
NCV	Non-Cited Violation
WIP	work-in-progress