

R3/d2 #48

DEC 21 1992

Docket No: 70-36  
License No. SNM-33

Combustion Engineering, Inc.  
ATTN: Mr. J. A. Rode, Plant Manager  
Hematite Nuclear Fuel Manufacturing  
P. O. Box 107  
Hematite, MO 63047

Gentlemen:

Enclosed are copies of the Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) prepared to support the amendment of Materials License No. SNM-33 for authorization to consolidate all nuclear fuel manufacturing operations at the Hematite, Missouri, facility. The FONSI, which has been forwarded to the Office of the Federal Register for publication, also contains a Notice of Opportunity for Hearing in accordance with Subpart L of 10 CFR Part 2.

Sincerely,

Original Signed By:

John W. N. Hickey, Chief  
Fuel Cycle Safety Branch  
Division of Industrial and  
Medical Nuclear Safety, NMSS

- Enclosures: 1. FONSI  
2. EA

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U.S. NUCLEAR REGULATORY COMMISSION  
FINDING OF NO SIGNIFICANT IMPACT AND  
NOTICE OF OPPORTUNITY FOR A HEARING  
AMENDMENT OF SPECIAL NUCLEAR MATERIAL  
LICENSE NO. SNM-33  
COMBUSTION ENGINEERING, INC.  
HEMATITE, MISSOURI  
DOCKET NO. 70-33

The U.S. Nuclear Regulatory Commission is considering the amendment of Special Nuclear Materials License No. SNM-33 for the consolidation of all nuclear fuel manufacturing operations at the Hematite, Missouri facility.

**SUMMARY OF THE ENVIRONMENTAL ASSESSMENT**

Identification of the Proposed Action: The proposed action is to consolidate all nuclear fuel manufacturing activities at the Hematite nuclear fuel manufacturing facility in Hematite, Missouri. This action will relocate all nuclear fuel rod and assembly loading activities currently being performed at CE's Windsor, Connecticut, facility to Hematite. Modifications that will be made to the Hematite site as part of this program include increasing the fenced work area by approximately 2 acres, constructing a new rod and bundle assembly manufacturing building, modifying a portion of the existing warehouse area to include new pellet drying facilities, and expanding the automobile parking area. Additional changes to be made to the site are relocating and replacing the main storm drain lines, relocating the outfall at the site pond, and adding ground surface drains.

The licensee is authorized to receive, use, possess, store, and transfer up to 8,000 kilograms of uranium enriched to a maximum of 5.0 weight percent in the U-235 isotope in accordance with 10 CFR Part 70 and up to 50,000 kilograms of source material in accordance with 10 CFR Part 40. The possession limits for low-enriched uranium and source materials will not change with consolidation.

The Need for The Proposed Action: The proposed action is based on CE's expressed need to improve commercial competitiveness in the marketplace. Consolidation of the fuel fabrication activities at the Hematite facility will

eliminate the need to transport radioactive materials between Connecticut and Missouri. Consolidating activities at Hematite will eliminate the need for the Windsor license. The licensee will, therefore, no longer be required to pay the annual fees and associated costs for two special nuclear material licenses.

Environmental Impacts of the Proposed Action: Preliminary construction associated with consolidation consisted of replacing the existing main storm drain with a larger main, relocating the main approximately 20 feet north of the existing line, and increasing the size of the parking area. The storm drain outfall into the site pond was also relocated during preliminary construction. The larger replacement main will accommodate the increased runoff from the roof of the new rod and assembly building and the parking area.

The new rod and assembly building (Building 230) was constructed on a grassy area immediately west of the fenced manufacturing area. Building 230 is 190 feet (58 meters) by 200 feet (61 meters) and contains approximately 38,000 feet<sup>2</sup> (3,530 meters<sup>2</sup>) of new manufacturing space. The building is constructed of a free-standing steel frame with poured shallow concrete spread footings. The concrete-slab floor is poured on grade. The building was designed to meet the 1990 Building Officials and Code Administrators code and should withstand a seismic zone 2 earthquake, a wind loading of 100 miles per hour (161 kilometers per hour), and a snow loading of 50 pounds per foot<sup>2</sup> (244 kilograms per meter<sup>2</sup>). The fence surrounding the manufacturing area will be enlarged by an additional 2.4 acres (9,712 meters<sup>2</sup>) to include Building 230.

The new rod and assembly building was built on grade so only a minimal amount of excavation was required for construction. There were no forested or wetland areas impacted because of the construction. The impact to the area due to the site modifications has not been significant.

There are no planned releases of radioactive liquid wastes from routine production processes. Uranium contained in the radioactive liquid wastes from mop and cleanup water, the wet recovery process, grinder coolants, and

scrubber solution is processed to recover the uranium. The amount of radioactive liquid waste to be processed for uranium recovery will increase as a result of consolidation. It is estimated that approximately 250 gallons of waste water will be generated per day in Building 230. Waste water potentially contaminated with uranium will be transferred to the pellet production building where it will be processed along with the other radioactive liquid wastes generated from production processes.

The volume of laundry waste water will slightly increase as a result of the increase in the number of personnel who will be wearing protective clothing and working in the controlled area. The site laundry discharges to the sanitary waste water system which discharges to the site creek. Prior to discharge, the liquid wastes will be sampled and analyzed for gross alpha and beta activities. The control limits currently in place for the discharge of liquid effluents to the site creek will not be changed. There will be no significant impact to the environment due to liquid discharges.

Contaminated solid waste generated at the site is expected to increase because of consolidation. Part of the increase in solid waste will be due to the additional liquid effluents. Solidification of the liquid waste is a major source of contaminated solid waste. The liquid waste is heated and concentrated, and the resulting concentrate is solidified, put into drums, and shipped to a commercial licensed disposal facility.

An additional amount of solid waste will be created from fuel rod and assembly production activities in Building 230. The types of contaminated solids that may be generated are combustible materials used for cleaning, protective clothing, shoes, gloves, contaminated tools, equipment, fixtures, contaminated Zircaloy tubing, end caps, springs, and other scrap production parts. After the potentially contaminated waste is analyzed to determine the U-235 content, the combustible wastes are incinerated on site. Non-combustible wastes are packaged in 55-gallon drums or metal boxes for shipment to a licensed low-level burial site.

While there will be an increase in the amount of solid waste generated, the

amount is expected to be low. To reduce the amount of waste produced, strict control will be maintained on material brought into the controlled area. Combustible wastes will be incinerated to reduce the amount of solid waste to be shipped to a licensed burial site. The increase in the solid waste produced by consolidation will not have a significant impact on the area.

Prior to release to the environment, airborne effluents from process areas and process equipment are air filtered. While the processes are in operation, particulate filters continuously collect stack samples. The filters are changed weekly and are analyzed for gross alpha levels after suitable delay for the decay of the naturally occurring radon daughter products. The licensee's existing control limits will not change for gross alpha activity in the exhaust air effluents of  $4 \times 10^{-12}$   $\mu\text{Ci}/\text{cc}$ , when averaged over a 2-week period, and 150  $\mu\text{Ci}$  per calendar quarter.

Prior to consolidation there were 17 exhaust stacks, and after consolidation, there will be 16 stacks. Six of the existing stacks will be eliminated and replaced with three new stacks. New stacks will be added in the new pellet drying area and in Building 230. All new stacks will be HEPA-filtered to remove the particulate material in the air stream prior to discharge to the atmosphere.

The ventilation system for the fuel process areas in Building 230 is designed to move air from uncontaminated to contaminated areas. The specific operations in Building 230 that will be ventilated using a centralized HEPA-filtered ventilation system are the pellet alignment tables, the pellet/tube loading blocks, the short stack hood, and the scrap packaging hood. Other operations in the building may also be ventilated through HEPA filters. The air passing through this system will move through two tandem banks of absolute HEPA filters, which should remove essentially all of the particulate matter. The exhaust air will be continuously sampled and analyzed for uranium content. The air exiting the filter banks can either be recycled back into the work place or exhausted to the outside atmosphere.

A dose assessment was performed to evaluate if the proposed action would

significantly increase the dose to the nearest residence from activities conducted at the site. The nearest private residence is located 290 meters east-southeast of the plant site. The calculated effective dose equivalent to the nearest adult resident is 0.024 mrem. For uranium exposure, the critical organ is the bone surface. The calculated dose to the bone surface is 0.36 mrem.

The calculated doses are well below the annual whole body dose limits set in 40 CFR 190.10 of 25 mrem and 10 CFR 20.105 of 500 mrem. The addition of the fuel rod and assembly work to the current fuel manufacturing operations will not significantly increase the doses to the nearest resident.

Conclusion: The staff concludes that consolidating all nuclear fuel manufacturing activities at the Hematite facility will not significantly impact the environment surrounding the site. The impact to the area from site modifications has not been significant. While the amount of liquid effluents generated will increase, the existing control limits in place for liquid discharges will not change, and the impact to the environment due to liquid discharges will not be significant. The actual volume of uranium in the air effluents discharged to the atmosphere may decrease because of the additional filters placed on the new stacks. The calculated dose to the nearest resident is well below established federal regulations. If the proposed action is approved, the licensee will be able to terminate the Windsor special nuclear material license and decommission those buildings that had been used for fuel fabrication, resulting in a net positive impact to the environment.

Alternatives to the Proposed Action: The alternative to the proposed action is to deny the license amendment. Denial of the proposed action would mean the licensee would have to continue manufacturing the nuclear fuel rods and assemblies at the Windsor facility, if they were to remain in business. This alternative would only be considered if there were public health and safety issues that could not be resolved to the satisfaction of the NRC.

Agencies and Persons Consulted: In completing this assessment, the staff utilized the application dated August 5, 1992, and supplemental environmental

information dated June 19, 1992, and November 12, 1992. Also, on September 3, 1992, the staff visited the site and discussed the amendment application with CE personnel.

Finding of No Significant Impact: The Commission has prepared an Environmental Assessment related to the amendment of Special Nuclear Material License No. SNM-33. On the basis of the assessment, the Commission has concluded that environmental impacts that would be created by the proposed licensing action would not be significant and do not warrant the preparation of an Environmental Impact Statement. Accordingly, it has been determined that a Finding of No Significant Impact is appropriate.

The Environmental Assessment and the above documents related to this proposed action are available for public inspection and copying at the Commission's Public Document Room at the Gelman Building, 2120 L Street NW., Washington, DC.

#### OPPORTUNITY FOR A HEARING

Any person whose interest may be affected by the issuance of this renewal may file a request for a hearing. Any request for hearing must be filed with the Office of the Secretary, U.S. Nuclear Regulatory Commission, Washington, DC 20555, within 30 days of the publication of this notice in the Federal Register; be served on the NRC staff (Executive Director for Operations, One White Flint North, 11555 Rockville Pike, Rockville, MD 20852); on the licensee (Combustion Engineering, Inc., P.O. Box 107, Hematite, Missouri, 63047), and must comply with the requirements for requesting a hearing set forth in the Commission's regulation, 10 CFR Part 2, Subpart L, "Informal Hearing Procedures for Adjudications in Materials Licensing Proceedings."

These requirements, which the requestor must address in detail, are:

1. The interest of the requester in the proceeding;
2. How that interest may be affected by the results of the proceeding, including the reasons why the requestor should be permitted a hearing;
3. The requestor's areas of concern about the licensing activity that

is the subject matter of the proceeding; and

4. The circumstances establishing that the request for hearing is timely, that is, filed within 30 days of the date of this notice.

In addressing how the requestor's interest may be affected by the proceeding, the request should describe the nature of the requestor's right under the Atomic Energy Act of 1954, as amended, to be made a party to the proceeding; the nature and extent of the requestor's property, financial, or other (i.e., health, safety) interest in the proceeding; and the possible effect of any order that may be entered in the proceeding upon the requestor's interest.

Dated at Rockville, Maryland, this 21 day of December 1992.

FOR THE NUCLEAR REGULATORY COMMISSION

~~Original Signed by:~~

John Hickey, Chief  
Fuel Cycle Safety Branch  
Division of Industrial and  
Medical Nuclear Safety, NMSS

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

DEC 21 1992

**DOCKET NO:** 70-36

**LICENSEE:** Combustion Engineering, Inc. (CE)  
Hematite, Missouri

**SUBJECT:** ENVIRONMENTAL ASSESSMENT FOR LICENSE AMENDMENT  
DATED AUGUST 5, 1992, RE CONSOLIDATION OF FUEL  
MANUFACTURING OPERATIONS

### Introduction

By application dated August 5, 1992, CE requested an amendment to License SNM-33 to consolidate all nuclear fuel manufacturing operations at the Hematite nuclear fuel manufacturing facility in Hematite, Missouri. Environmental information supporting this amendment was submitted by letters dated June 19, 1992, and November 12, 1992.

This environmental assessment (EA) has been prepared by the staff of the U.S. Nuclear Regulatory Commission in accordance with the National Environmental Policy Act of 1969, NRC regulations (10 CFR 51), and Council on Environmental Quality regulations (40 CFR 1500-1508). An EA is a concise public document which serves to briefly provide sufficient evidence and analysis for determining whether an Environmental Impact Statement or a Finding of No Significant Impact is necessary, and which includes a brief discussion of the need for the proposed action, alternatives to and environmental impacts from the proposed action, and a list of agencies and persons contacted in preparing the EA.

### Proposed Action

The proposed action is to consolidate all nuclear fuel manufacturing activities to the Hematite nuclear fuel manufacturing facility in Hematite, Missouri. This action will relocate all nuclear fuel rod and assembly loading activities currently being performed at CE's Windsor, Connecticut, facility to Hematite. Modifications that will be made to the Hematite site as part of this program include increasing the fenced work area by approximately 2 acres, constructing a new rod and bundle assembly manufacturing building, modifying a portion of the existing warehouse area to include new pellet drying facilities, and expanding the automobile parking area. Additional changes to be made to the site are relocating and replacing the main storm drain lines, relocating the outfall at the site pond, and adding ground surface drains.

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The licensee is authorized to receive, use, possess, store, and transfer up to 8,000 kilograms of uranium enriched to a maximum of 5.0 weight percent in the U-235 isotope in accordance with 10 CFR Part 70 and up to 50,000 kilograms of source material in accordance with 10 CFR Part 40. The possession limits for low-enriched uranium and source materials will not change with consolidation.

#### **Need for the Proposed Action**

The proposed action is based on CE's expressed need to improve commercial competitiveness in the marketplace. Consolidation of the fuel fabrication activities at the Hematite facility will eliminate the need to transport radioactive materials between Connecticut and Missouri. Consolidating activities at Hematite will eliminate the need for the Windsor license. The licensee will, therefore, no longer be required to pay the annual fees and associated costs for two special nuclear material licenses.

The licensee is the largest employer, and approval of the proposed action would add new jobs to this area. Denial of the proposed action may cause CE to shutdown which would create a negative socioeconomic impact on the area.

#### **Alternatives Including the Proposed Action**

The alternative to the proposed action is to deny the license amendment. Denial of the proposed action would mean the licensee would have to continue manufacturing the nuclear fuel rods and assemblies at the Windsor facility, if they were to remain in business. This alternative would only be considered if there were public health and safety issues that could not be resolved to the satisfaction of the NRC.

The environmental impacts of the alternative of the proposed action will be discussed in this document.

#### **Background**

The facility is located approximately 35 miles (56 km) south of St. Louis, Missouri, 3/4 of a mile (1.2 km) northeast of the town of Hematite in Jefferson County (Figure 1). The site is located on approximately 155 acres with licensed activities being conducted in a 6-acre fenced work area.

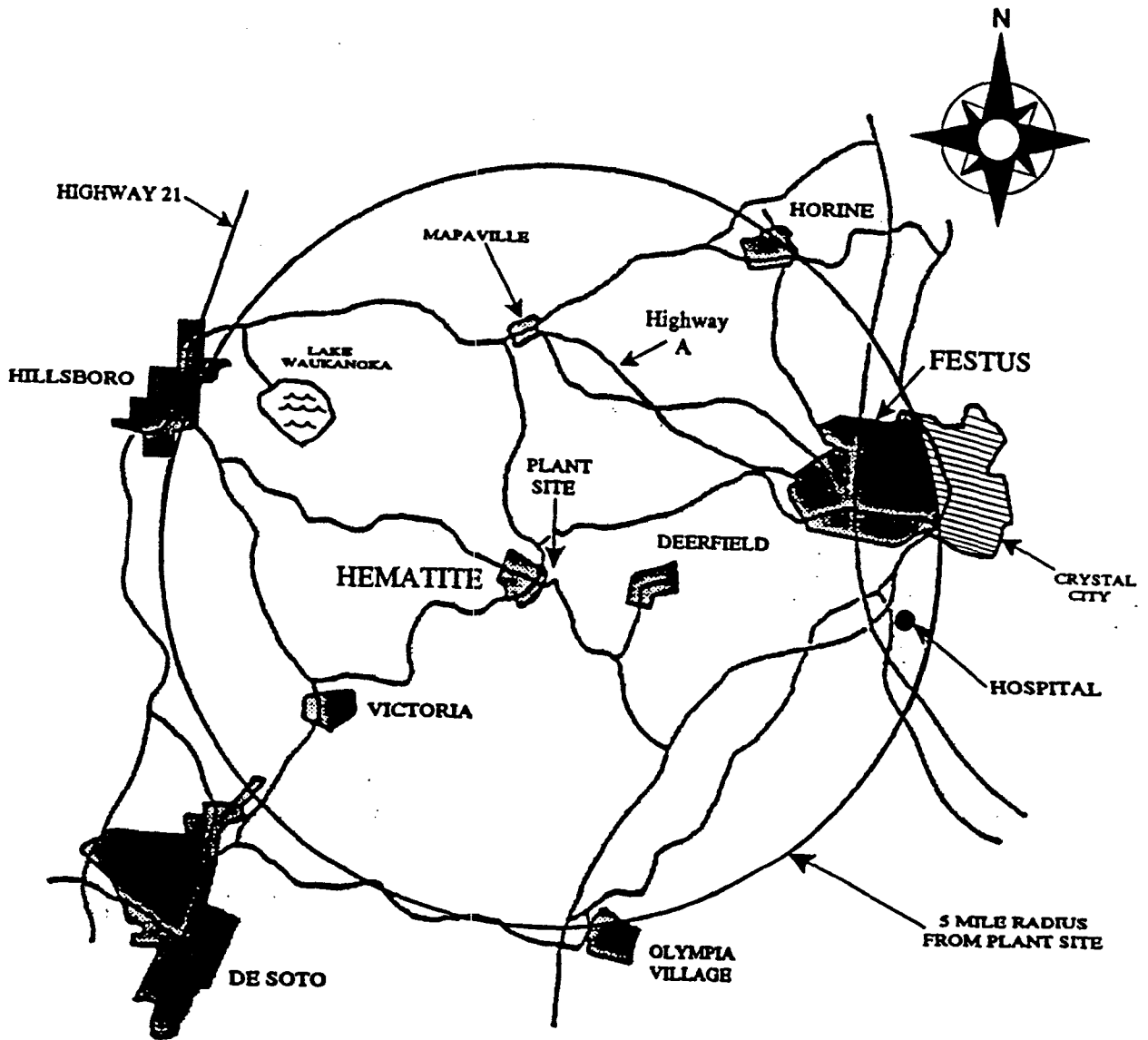


FIGURE 1  
Area Within 5 Mile Radius of Plant Site

Currently, uranium hexafluoride ( $UF_6$ ) feed material, enriched up to 5 percent in the isotope U-235, is converted to uranium dioxide powder ( $UO_2$ ). The powder is aggregated using either an organic binder and a suitable solvent or a dry powder slugging press. The agglomerated powder is granulated to ensure a consistent press feed and then pressed into pellets. The "green" pellets are processed through a dewaxing furnace to remove additives and then through a sintering furnace, where the pellets densify and achieve their desired characteristics. After being sized using a centerless grinder, the sintered pellets are dried, inspected, and packaged for shipment to Windsor, Connecticut, to be assembled into fuel rods and assemblies.

### Environmental Impacts of the Proposed Action

#### Site Modifications

Preliminary construction associated with consolidation consisted of replacing the existing main storm drain with a larger main, relocating the main approximately 20 feet north of the existing line, and increasing the size of the parking area. The storm drain outfall into the site pond was also relocated during preliminary construction. The larger replacement main will accommodate the increased runoff from the roof of the new rod and assembly building and the parking area (Figure 2).

The new rod and assembly building (Building 230) was constructed on a grassy area immediately west of the fenced manufacturing area (Figure 3). Building 230 is 190 feet (58 meters) by 200 feet (61 meters) and contains approximately 38,000  $feet^2$  (3,530  $meters^2$ ) of new manufacturing space. The building is constructed of a free-standing steel frame with poured shallow concrete spread footings. The concrete-slab floor is poured on grade. The building was designed to meet the 1990 Building Officials and Code Administrators code and should withstand a seismic zone 2 earthquake, a wind loading of 100 miles per hour (161 kilometers per hour), and a snow loading of 50 pounds per  $foot^2$  (244 kilograms per  $meter^2$ ). The fence surrounding the manufacturing area will be enlarged by an additional 2.4 acres (9,712  $meters^2$ ) to include Building 230.

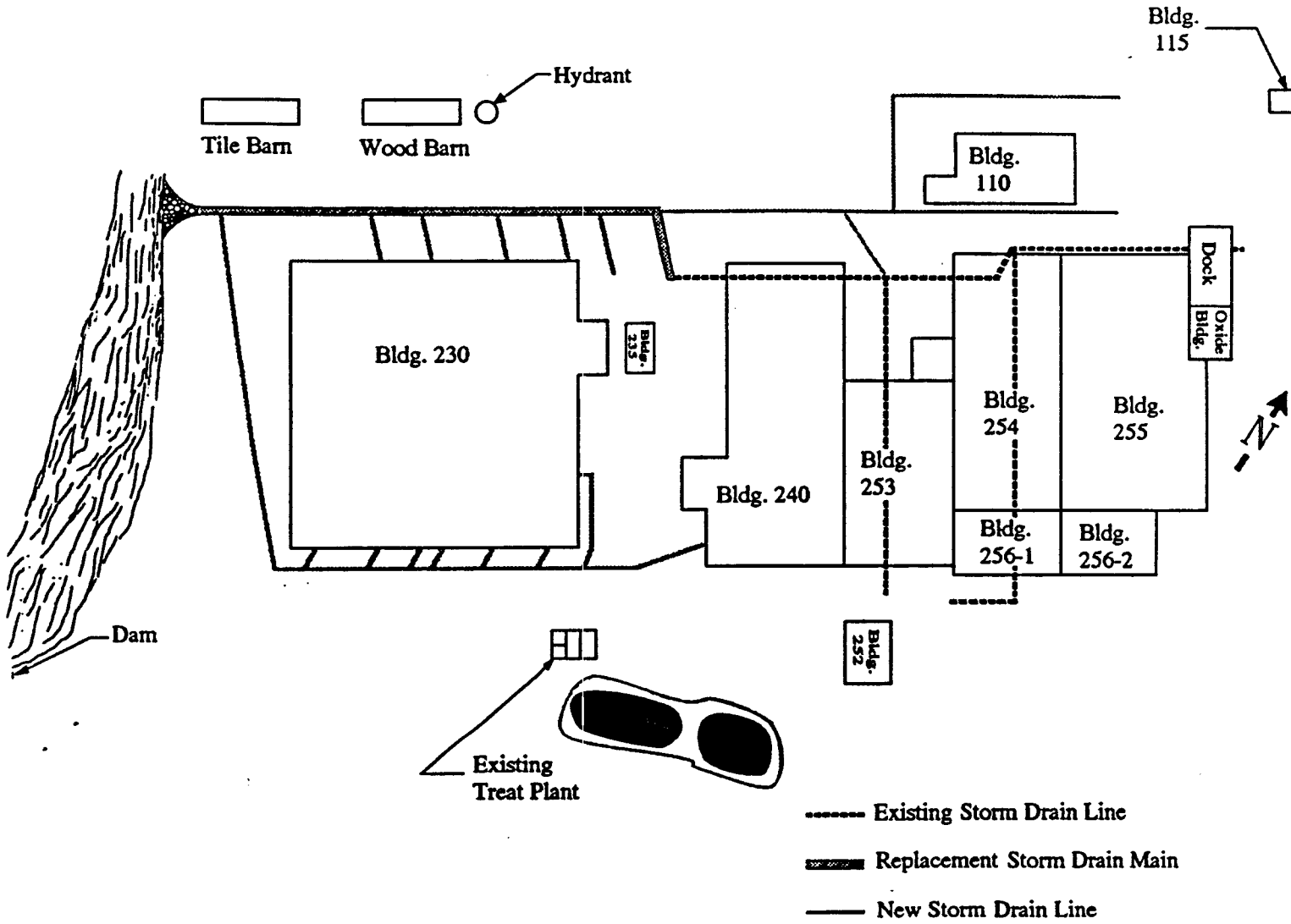


FIGURE 2  
Storm Drain Lines

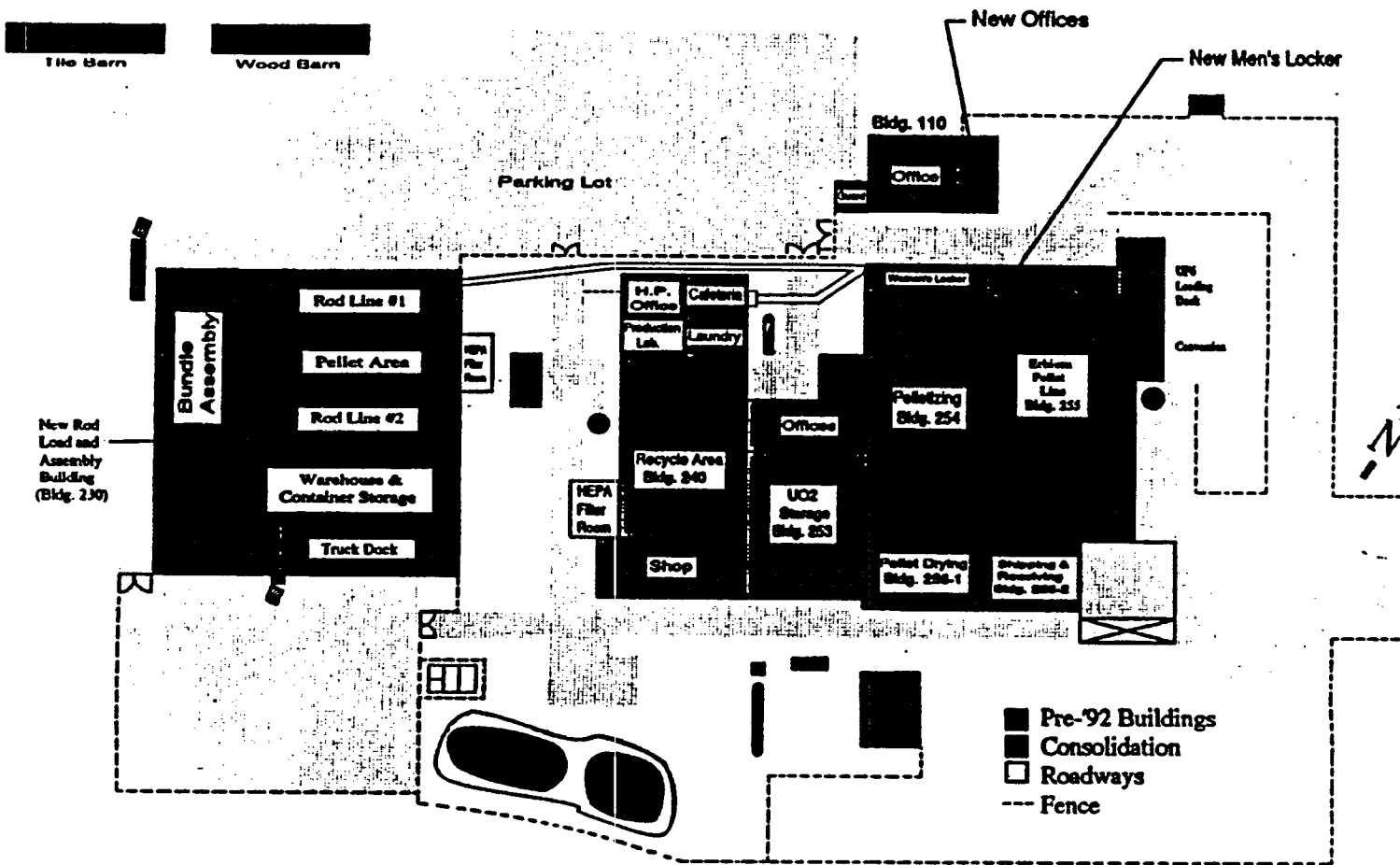


FIGURE 3  
New Fenced Area and New Building Layout

Additionally, to accommodate the additional activities associated with consolidating all nuclear fuel manufacturing activities at the Hematite facility, modifications will be made to existing buildings, including the following:

1. Four existing stacks in the Oxide Building will be eliminated and replaced by a new, single stack. The flow through the new stack will be through HEPA filters to remove particulates from the air stream.
2. The current warehouse (Building 256) will be divided into a pellet drying area and a smaller warehouse. A HEPA-filtered ventilation stack will be added to the pellet drying area.
3. A new HEPA filter room will be added to the southwest end of Building 240 to filter particulates from the exhaust air. The two existing stacks in Building 240 will be replaced by two new stacks in the filter room.
4. Additional office spaces will be built on the east end of Office Building 110 and a new Guard Station will be built on the west end.
5. A new men's locker room will be added to the north end of the Special Pelletizing Building 255. The new locker room will be an insulated pre-fabricated building.

The new rod and assembly building was built on grade so only a minimal amount of excavation was required for construction. There were no forested or wetland areas impacted because of the construction. The impact to the area due to the site modifications has not been significant.

#### Liquid Effluents

There are no planned releases of radioactive liquid wastes from routine production processes. Uranium contained in the radioactive liquid wastes from mop and cleanup water, the wet recovery process, grinder coolants, and scrubber solution is processed to recover the uranium. The amount of radioactive liquid waste to be processed for uranium recovery will increase as a result of consolidation. It is estimated that approximately 250 gallons of waste water will be generated per day in

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Building 230. Waste water potentially contaminated with uranium will be transferred to the pellet production building where it will be processed along with the other radioactive liquid wastes generated from production processes.

The volume of laundry waste water will slightly increase as a result of the increase in the number of personnel who will be wearing protective clothing and working in the controlled area. The site laundry discharges to the sanitary waste water system which discharges to the site creek. Prior to discharge, the liquid wastes will be sampled and analyzed for gross alpha and beta activities. The control limits currently in place for the discharge of liquid effluents to the site creek will not be changed. There will be no significant impact to the environment due to liquid discharges.

#### Solid Waste

Contaminated solid waste generated at the site is expected to increase because of consolidation. Part of the increase in solid waste will be due to the additional liquid effluents. Solidification of the liquid waste is a major source of contaminated solid waste. The liquid waste is heated and concentrated, and the resulting concentrate is solidified, put into drums, and shipped to a commercial licensed disposal facility.

An additional amount of solid waste will be created from fuel rod and assembly production activities in Building 230. The types of contaminated solids that may be generated are combustible materials used for cleaning, protective clothing, shoes, gloves, contaminated tools, equipment, fixtures, contaminated Zircaloy tubing, end caps, springs, and other scrap production parts. After the potentially contaminated waste is analyzed to determine the U-235 content, the combustible wastes are incinerated on site. Non-combustible wastes are packaged in 55-gallon drums or metal boxes for shipment to a licensed low-level burial site.

While there will be an increase in the amount of solid waste generated, the amount is expected to be low. To reduce the amount of waste produced, strict control will be maintained on material brought into the controlled area. Combustible wastes will be incinerated to reduce the amount of solid waste to be shipped to a licensed burial site. The increase in the solid waste produced by consolidation will not have a significant impact on the area.



### Airborne Effluents

Prior to release to the environment, airborne effluents from process areas and process equipment are air filtered. While the processes are in operation, particulate filters continuously collect stack samples. The filters are changed weekly and are analyzed for gross alpha levels after suitable delay for the decay of the naturally occurring radon daughter products. The licensee's existing control limits will not change for gross alpha activity in the exhaust air effluents of  $4 \times 10^{-12}$   $\mu\text{Ci/cc}$ , when averaged over a 2-week period, and 150  $\mu\text{Ci}$  per calendar quarter.

Prior to consolidation there were 17 exhaust stacks, and after consolidation, there will be 16 stacks (Figure 4). Six of the existing stacks will be eliminated and replaced with three new stacks. New stacks will be added in the new pellet drying area and in Building 230. All new stacks will be HEPA-filtered to remove the particulate material in the air stream prior to discharge to the atmosphere.

The ventilation system for the fuel process areas in Building 230 is designed to move air from uncontaminated to contaminated areas. The specific operations in Building 230 that will be ventilated using a centralized HEPA-filtered ventilation system are the pellet alignment tables, the pellet/tube loading blocks, the short stack hood, and the scrap packaging hood. Other operations in the building may also be ventilated through HEPA filters. The air passing through this system will move through two tandem banks of absolute HEPA filters, which should remove essentially all of the particulate matter. The exhaust air will be continuously sampled and analyzed for uranium content. The air exiting the filter banks can either be recycled back into the work place or exhausted to the outside atmosphere.

A dose assessment was performed to evaluate if the proposed action would significantly increase the dose to the nearest residence from activities conducted at the site. The nearest private residence is located 290 meters east-southeast of the plant site. The calculated effective dose equivalent to the nearest adult resident is 0.024 mrem. For uranium exposure, the critical organ is the bone surface. The calculated dose to the bone surface is 0.36 mrem.

The calculated doses are well below the annual whole body dose limits set in 40 CFR 190.10 of 25 mrem and 10 CFR 20.105 of 500 mrem. The addition of the fuel rod and assembly work to the

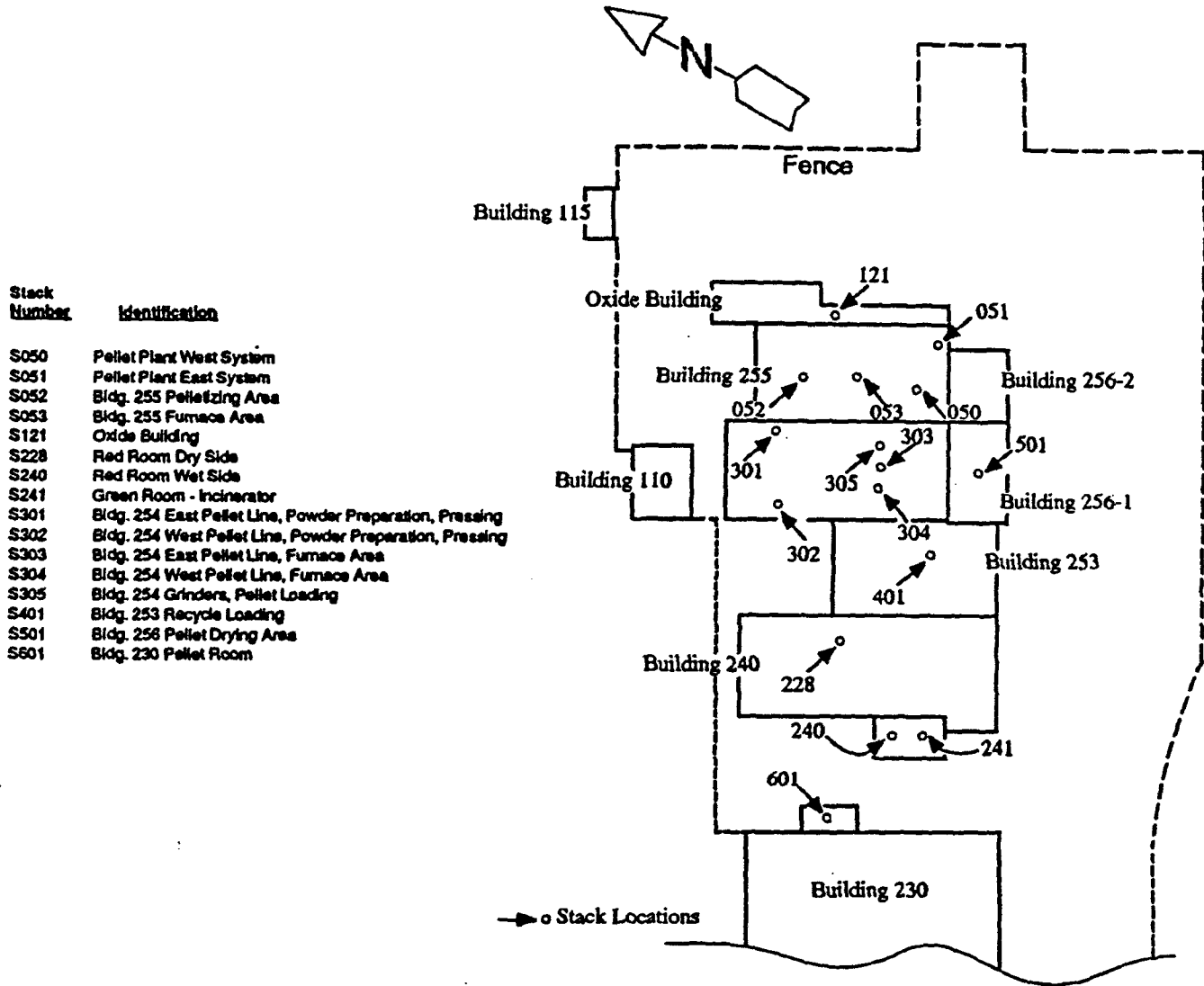


Figure 4  
New Exhaust Stack Locations

the current fuel manufacturing operations will not significantly increase the doses to the nearest resident.

#### Chemical Usage

Because of consolidation, the amount of ammonia used annually will increase. Currently, approximately 600,000 pounds of ammonia are used each year. The new pellet drying operation will add approximately 20,000 pounds of ammonia to the total volume used per year. The ammonia is currently stored in a 10,000 gallon tank. An additional 8,000-gallon storage tank will be installed to facilitate handling of the ammonia.

New activities associated with consolidation will require the use of nitrogen, helium, and alcohol. Nitrogen and helium are non-toxic, inert gases and their use will be inconsequential. Nitrogen will be used as a curtain gas in the pellet drying furnace, and helium will be used in the rod end cap welding process. The alcohol will be used to clean components in some of the pellet plant and rod line operations and as a quality control check in pellet processing. It is estimated that approximately 350 gallons of alcohol will be used per year.

#### Environmental Monitoring

To verify that the construction site had not been contaminated with radioactive material, a survey of the soil was conducted in the field prior to constructing the new Assembly Building. According to available information, the construction area was never used for processing, storing, or disposing of special nuclear material. The survey results indicate that the maximum value is 11.6 pCi/gm, the average value is 6.2 pCi/gm, and the standard deviation is 2.8 pCi/gm. The maximum value is less than the 30 pCi/gm value recommended in the Branch Technical Position.

Because the current environmental monitoring program is adequate to determine if expanded plant activities are having an impact on the surrounding environment, the program will not be revised.

#### Agencies and Persons Contacted

In completing this assessment, the staff contacted CE personnel.

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**Conclusion**

The staff concludes that consolidating all nuclear fuel manufacturing activities at the Hematite facility will not significantly impact the environment surrounding the site. If the proposed action is approved, the licensee will be able to terminate the Windsor special nuclear material license and decommission those buildings that had been used for fuel fabrication. This would result in a net positive impact to the environment.

Original Signed By:

Elaine Keegan  
 Uranium Fuel Section  
 Fuel Cycle Safety Branch  
 Division of Industrial and  
 Medical Nuclear Safety, NMSS

Approved by: ~~Original Signed By~~  
Michael Tokar, Section Leader

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