



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
URANIUM RECOVERY FIELD OFFICE
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[REDACTED]

URFO:PJG
Docket No. 40-8903
SUA-1471 [REDACTED] No. 16
X60643

MEMORANDUM FOR: Docket No. 40-8903

FROM: Pete J. Garcia, Jr., Project Manager

SUBJECT: AMENDMENT NO. 16 TO SOURCE MATERIAL LICENSE SUA-1471 FOR THE
HOMESTAKE MINING COMPANY'S GRANTS MILL

By letter dated December 4, 1992, Homestake Mining Company requested amendment of Source Material License SUA-1471 for the Grants Mill to update programs referenced in the license to reflect the current status of the facility and consolidate the referenced programs into one submittal. Based on the staff review of the submittal, the licensee submitted additional information and revised versions of the amendment request. A fully revised application was submitted by Homestake on September 2, 1993. The staff's review of the licensee's amendment request is discussed below.

License Condition No. 10 of the Homestake license references licensee submittals which describe programs in effect when the facility was an operating mill. These include all major radiation safety and environmental monitoring programs in effect at the site. Table 1 of the September 2 submittal shows all environmental monitoring performed at the site, with the exception of ground-water sampling which is discussed later in this document. Table 3 addresses aspects of the site radiation safety program.

The environmental monitoring program shown on Table 1 is basically unchanged from the program currently referenced in the license. The current environmental monitoring program consists of six monitoring stations which include continuous air samplers, passive continuous radon gas monitors, and thermoluminescent dosimeters (TLDs). Radon concentrations are also measured at two additional locations. Soil and vegetation samples are collected annually at the environmental monitoring stations.

The site radiation safety program provided in Table 3 reflects the status of the Grants Mill as a decommissioning facility. As a result, routine air sampling and gamma surveys in predetermined locations have been eliminated since routine operations are no longer being conducted. Instead, the

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radiation survey program will be conducted based on Radiation Work Orders (RWOs) issued by the site Radiation Protection Administrator (RPA). The RWOs will be issued for all mill decommissioning activities to be performed.

Bioassay samples will be collected from all employees involved in mill decommissioning work on a monthly frequency. Following the completion of mill decommissioning, workers remaining onsite will be sampled semiannually. In addition, baseline and termination samples will be collected from all workers involved in decommissioning activities. Personal TLDs will also be issued to all workers and exchanged quarterly.

The licensee's September 2, 1993, submittal includes the detailed procedures to be implemented concerning the bioassay and respiratory protection programs. These procedures were submitted at the request of the staff due to the extent of information necessary to determine the adequacy of these programs. The staff review of the procedures submitted by the licensee indicates that the proposed programs are acceptable and in accordance with guidance provided in Regulatory Guides 8.15 and 8.22.

Table 2 of the September 2 submittal describes the ground-water sampling program in effect at the site. The table includes several wells not included in the ground-water sampling program currently included in the license. The licensee requested in the September 2 cover letter that Table 2 replace the ground-water corrective action program currently specified in License Condition No. 35(C). However, the staff review of Table 2 revealed that it includes only ground-water sampling requirements, and not the complete corrective action program addressed in License Condition No. 35(C). As a result of this review, the staff concludes that Table 2 should replace a table which specifies ground-water sampling requirements only and is referenced in License Condition No. 35(A).

The staff concludes that the license should be amended to incorporate the licensee's September 2, 1993, submittal as discussed above. In accordance with the categorical exclusion contained in paragraph (c)(11) of 10 CFR 51.22, an environmental assessment is not required for this licensing action. That paragraph states that the categorical exclusion applies to the issuance of amendments to licenses for uranium mills provided that (1) there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite, (2) there is no significant increase in individual or cumulative occupational radiation exposure, (3) there is no significant construction impact, and (4) there is no significant increase in the potential for or consequences from radiological accidents.

The licensing action discussed in this memorandum meets these criteria as the proposed amendment simply updates the license to incorporate radiation safety and environmental monitoring programs which reflect the status of the decommissioning facility. An environmental report is not required from the licensee since the amendment does not meet the criteria of 10 CFR 51.60 (b)(2).

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Based on the above, the staff recommends that Source Material License SUA-1471 be amended to incorporate the licensee's September 2, 1993, submittal by revising License Condition Nos. 10 and 35(A) to read as follows:

10. This license authorizes only the possession of residual uranium and byproduct material in the form of uranium waste tailings and other byproduct waste generated by the licensee's past milling operations in accordance with Tables 1 and 3 and the procedures submitted by letter dated September 2, 1993.

Anywhere the word "will" is used, it shall denote a requirement.

[Applicable Amendments: 2, 6, 12, 16]

35. A. Implement the monitoring program shown in Table 2 of the licensee's September 2, 1993 submittal.

[Applicable Amendments: 3, 4, 5, 7, 8, 10, 11, 16]

The issuance of this amendment was discussed and agreed to via telecon with Mr. Fred Craft of Homestake Mining Company on September 17, 1993.



Pete J. Garcia, Jr.
Project Manager

Case Closed: X60643

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09/20/93	09/20/93	09/22/93	09/23/93	