



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
612 EAST LAMAR BLVD, SUITE 400  
ARLINGTON, TEXAS 76011-4125

September 24, 2010

Billy Ray  
Manager  
Rio Algom Mining LLC  
P.O. Box 218  
Grants, New Mexico 87020

SUBJECT: NRC INSPECTION REPORT 040-08905/10-001

Dear Mr. Ray:

This refers to the announced inspection conducted on July 13 and 14, 2010, at Rio Algom Mining's Ambrosia Lake facility located near Grants, New Mexico. The 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. The preliminary inspection findings were discussed with you at the exit briefing conducted at the conclusion of the onsite inspection, and the final inspection findings were presented to you by telephone on August 31, 2010. The enclosed report presents the results of this inspection.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC's Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

Should you have any questions concerning this inspection, please contact Ms. Linda Gersey, Health Physicist, at (817) 860-8299, or the undersigned at (817) 860-8197.

Sincerely,

*/RA/*

Jack E. Whitten, Chief  
Nuclear Materials Safety Branch B

Docket: 040-08905  
License: SUA-1473

Enclosure:  
NRC Inspection Report 040-08905/10-001

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LMGerseydlf	GASchlapper	DTMandeville	JEWhitten	
<i>/RA/</i>	<i>E - LMGersey</i>	<i>E - LMGersey</i>	<i>/RA/</i>	
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U.S. NUCLEAR REGULATORY COMMISSION  
REGION IV

Docket: 040-08905

License: SUA-1473

Report: 040-08905/10-001

Licensee: Rio Algom Mining Co.

Facility: Former Ambrosia Lake Mill

Location: McKinley County, New Mexico

Dates: July 13 and 14, 2010

Lead Inspector: Linda M. Gersey, Health Physicist  
Nuclear Materials Safety Branch B

Accompanied by: Gerald A. Schlapper, Health Physicist  
Repository and Spent Fuel Safety Branch

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Management Programs

Approved by: Jack E. Whitten, Chief  
Nuclear Materials Safety Branch B

Attachments: Supplemental Inspection Information

ENCLOSURE

## EXECUTIVE SUMMARY

### Rio Algom Mining Company's Former Uranium Mill NRC Inspection Report 040-08905/10-001

This inspection included a review of site status, management organization and controls, radiation protection, operator training, maintenance and surveillance testing, environmental protection, transportation and radwaste activities, and emergency preparedness. In summary, the licensee was conducting activities safely and in accordance with regulatory and license requirements.

#### Management Organization and Controls

- The organizational structure and staffing levels were sufficient for the work in progress (Section 1).
- Site procedures were established and as low as reasonably achievable audits were being performed (Section 1).

#### Radiation Protection

- The licensee implemented a radiation protection program that met the requirements of 10 CFR Part 20 and the license (Section 2).
- Employee and contractor doses were below regulatory limits (Section 2).

#### Operator Training and Retraining

- Radiation protection training was provided to site workers as required by regulations and the license (Section 3).

#### Maintenance and Surveillance of Safety Controls

- Radiation survey instruments and air samplers were being calibrated as required by site procedures (Section 4).
- Daily and weekly radiological inspections were being performed (Section 4).

#### Effluent Control and Environmental Protection

- The licensee had implemented the environmental monitoring program as required by the license and regulations (Section 5.2a).
- One compliance well was in exceedance of the alternate concentration limits and was being sampled monthly (Section 5.2b).

#### Inspection of Transportation Activities and Radioactive Waste Management

- The licensee was conducting transportation and waste disposal operations in accordance with license requirements (Section 6).

### Emergency Preparedness

- The licensee had adequate procedures, equipment, and training needed to respond to emergencies (Section 7).

## Report Details

### Site Status

Rio Algom Mining's Ambrosia Lake conventional mill ceased operations in 1985 and is currently undergoing decommissioning. The mill was demolished between November 2003 and February 2004. Remaining onsite structures included the machine shop, water treatment facility, ion exchange building, and site offices. At the time of this inspection, the licensee was installing a rock erosion cover on the slopes of Pond 3. This work was scheduled to be completed during October 2009.

The following is the status of facility at the time of the inspection:

- Pond 1 Tailings Cell has a final radon barrier and rock cover, which was approved by the NRC in the mid-1990's.
- Pond 2 Tailings Cell does not have a radon barrier or rock cover, although the NRC approved the cover design in June 2009. Radon flux monitoring is being conducted on an annual basis to satisfy 10 CFR Part 40, Appendix A, Criterion 6A(2).
- Pond 3 Tailings Cell contains wind-blown material and has clean soil and rock cover. Pond 3 Tailings Cell does not require formal approval from NRC for closure, although the work completed will be part of the Master Completion Plan.
- The 1000-year external diversion channel was completed and NRC observed the construction in May 2009.

The following actions require completion:

- Contractors to demolition remaining structures.
- Construct the interior diversion channel.
- Place soil cover on evaporation ponds 4, 5, and 6. The licensee plans to use a rock cover and use alternate release criteria.
- Identify and remove contaminated soil from mill yard. After contaminated soil is removed, re-grade and vegetate area.
- Remove radium settling pond sediments for disposal.
- Evaporation ponds 7 and 8 have soil covers but not rock covers. South side channel needs to be re-enforced.
- Radon barrier borrow pits need to be reclaimed.
- Section 4, the former evaporation pond area, had several thorium-230 surface soil results that did not meet the cleanup standard and several soil results that did not meet

- the sum-of-ratios criteria for natural uranium, thorium-230, and radium-226. The licensee needs to assess the next steps for handling this situation in addressing the elevated soil results.

## **1 Management Organization and Controls (88005)**

### **1.1 Inspection Scope**

Ensure that the licensee had established an organization to administer the technical programs and established programs to perform internal reviews, self-assessments, and audits.

### **1.2 Observations and Findings**

During the inspection, the inspectors determined there were seven Rio Algom Mining employees assigned to the project. The highest ranking employee onsite was the Site Manager. The Site Manager was appointed effective June 2010, replacing the former company president who has retired but remains on-site as a consultant. The Environmental Supervisor serves as the Radiation Safety Officer (RSO) and is responsible for implementation of the radiation protection program. Two radiation/environmental technicians assist the RSO with the radiation protection duties. The licensee used contractors to conduct reclamation work as needed. Other contractors onsite included security staff. The inspectors concluded that the licensee's staffing and organization were appropriate for the work in progress.

License Conditions 14 and 16 require, in part, that written procedures be established and reviewed by the RSO at least annually. The inspectors reviewed several written procedures maintained by the licensee and determined that they were adequate. The inspectors noted that the RSO had performed an annual procedure review for 2008 through 2010.

The licensee's annual As Low As Reasonably Achievable (ALARA) audits were conducted for calendar years 2008 and 2009 by the RSO, as required by 10 CFR 20.1101(c), and were submitted to the NRC for review. Each ALARA audit described the facility activities during the year, compiled data on the health physics sampling activities, and reviewed exposure summaries. The inspectors found the ALARA audits to be adequate.

### **1.3 Conclusions**

The organizational structure and staffing levels were sufficient for the work in progress. Site procedures were established and ALARA audits were being performed.

## **2 Radiation Protection (83822)**

### **2.1 Inspection Scope**

Determine if the licensee's radiation protection program was in compliance with license and 10 CFR Part 20 requirements.

## 2.2 Observations and Findings

### a. Radiation Protection Program Review

The licensee's personnel monitoring program included the use of optically stimulated luminescence dosimeters to monitor external gamma exposures. The inspectors reviewed the licensee's exposure records for 2008 through the first quarter 2010. The highest deep dose equivalent exposure for 2008 was 204 millirems, assigned to a contractor working on the lined pond closure and diversion channel projects. The highest deep dose equivalent exposure for 2009 was 414 millirems, assigned to a contractor working on the Section 4 lined pond closure project. During the first quarter 2010, all dosimeters were below the minimum detectable threshold.

In addition to external exposure monitoring, the licensee conducted internal monitoring for radon daughters using lapel air samplers, when appropriate. Lapel air samplers were assigned to selected workers who were conducting work activities in the lined evaporation ponds. The licensee then tabulated the results of lapel air sampling maintained for each individual monitored on a monthly basis. Following tabulation of the results of lapel air samples, the tabulated doses were assigned as internal doses to site workers as appropriate. In 2008, no doses were assigned to individuals from radon daughters. In 2009, the highest internal dose was 12 millirem, this dose was assigned to a contractor. No internal doses were assigned to employees during the first quarter of 2010.

License Conditions 16 and 17 specify, in part, the licensee's bioassay sampling requirements. Bioassay sampling was conducted quarterly for licensee employees and monthly for workers assigned to the project involving the reclamation of the lined ponds. The inspectors reviewed the sample results collected for 2008 through the first quarter of 2010. All bioassay sample results reviewed by the inspectors were less than the lower limit of detection of 5 micrograms of uranium per liter of urine.

The licensee calculated total effective dose equivalent exposures based on the results of external and internal monitoring. The highest total effective dose equivalent exposure for 2008 was 204 millirems, while the highest exposure for 2009 was 426 millirems. The regulatory limit for occupational exposures is 5,000 millirems. Therefore, radiation exposures received by occupationally exposed individuals remained below the regulatory limit.

Airborne uranium sampling was conducted by the licensee quarterly at a minimum of six locations. The inspectors reviewed the airborne uranium sample results the licensee had documented from 2008 through the first quarter of 2010. Uranium activity in the air was measured by the licensee to be at background levels and was determined to be less than 1 percent of the derived air concentration limit for soluble natural uranium.

Airborne radon progeny sampling was conducted quarterly at 12 plant locations. The inspectors reviewed the results for 2008 through the first quarter of 2010. The 2008 and first quarter 2010 radon progeny averaged 0.0 working levels. The average radon progeny concentration during 2009 was 0.02 working levels in the ion exchange building. All samples were below the derived air concentration limit of 0.33 working levels.

Ambient gamma radiation exposure rate measurements were collected semiannually at nine locations. The results since the last inspection were reviewed by the inspectors. The highest measurements observed by the licensee were consistently obtained in the ion exchange building. This building is located within the radiologically restricted area of the site.

The licensee monitored for contamination through radiological surveys of equipment, surfaces, and personnel. In addition to routine radiological surveys, the licensee monitored for personnel contamination through random surveys of employees. The random surveys were conducted quarterly. Surface contamination surveys were required to be conducted at least monthly and at a minimum of 10 locations. The contamination surveys consisted of taking swipe samples for removable alpha particulate contamination. The records reviewed by the inspectors of samples collected since the last inspection indicated that no individual or location had exceeded the licensee's respective action levels.

Equipment release surveys were conducted by the licensee prior to releasing components for unrestricted use. The licensee had maintained extensive records of equipment that had been released for unrestricted use. The most common releases noted were vehicles and reclamation support equipment. The inspectors reviewed a random sample of the equipment release records maintained by the licensee for 2008 through July 2010. Based on the licensee's records that were reviewed by the inspectors, no equipment was identified as having been improperly released for unrestricted use.

b. Site Tours

The inspectors conducted extensive site tours with the Site Manager, the former company president, and the RSO, including areas where reclamation activities were in progress. Specific areas visited included: the Section 4 ponds area; Pond 3, 4, 5, and 6; and the proposed alternate disposal cell. The inspectors determined that licensed material was secure within the site property, as required by 10 CFR 20.1801 and 20.1802, and fences were posted with radioactive material signs as required by License Condition 28. Fences and gates were observed to be in good condition. In addition, the inspectors observed that the licensee had maintained routine security coverage at the site.

During the site tour, the inspectors measured the ambient gamma radiation exposure rates using a microRoentgen survey meter (Ludlum Model 19, NRC No. 015540, calibration due date 04/06/2011). At the reception desk in the administration building, a level of 15 microRoentgen per hour ( $\mu\text{R/hr}$ ) was noted. Radiation levels measured in the conference room in the administrative building were 35  $\mu\text{R/hr}$  compared to levels of approximately 40  $\mu\text{R/hr}$  behind the building. Levels in the maintenance shop were 8  $\mu\text{R/hr}$ , while those in the guard shack and change room area were 10  $\mu\text{R/hr}$ .

While touring the Section 4 area, the inspectors noted radiation readings at the locked entry gate to this area were 10  $\mu\text{R/hr}$ , while levels in the general area of the reclaimed ponds ranged from 8 to 15  $\mu\text{R/hr}$ . The highest measurements observed by the inspectors during the site tour were in the ion exchange building. Levels near piping ranged from 200-250  $\mu\text{R/hr}$ , while measurements near resin processing areas reached

1500 µR/hr. The maximum level found, 4500 µR/hr, was located in piping near an elbow. In summary, throughout the site tour, no levels were noted that would require posting as a radiation area (5000 µR/hr).

### 2.3 Conclusions

The licensee implemented a radiation protection program that met the requirements of 10 CFR Part 20 and the license. Employee and contractor doses were below regulatory limits.

## **3 Operator Training and Retraining (88010)**

### 3.1 Inspection Scope

Determine whether the licensee was complying with regulations and license requirements related to the training of employees.

### 3.2 Observations and Findings

The inspectors reviewed the licensee's training program to determine compliance with 10 CFR 19.12, which requires, in part, that occupational exposed workers be provided radiation safety training. Initial training for new employees and refresher training for all employees were provided by the licensee during 2009-2010. The inspectors reviewed the training records of one new employee and the training documents maintained for the 2009 and 2010 annual radiation safety refresher training. The inspectors noted that training records provided by the licensee included written radiation safety tests and appeared to be adequate. Since 2004, U.S. Department of Transportation hazardous material training has not been conducted, nor is the training required, since there have been no radioactive material shipments made by the licensee offsite on public roads since that time.

### 3.3 Conclusions

Radiation protection training was provided to site workers as required by regulations and the license.

## **4 Maintenance and Surveillance of Safety Controls (88025)**

### 4.1 Inspection Scope

Determine whether surveillance tests and calibrations were being conducted in accordance with license requirements and site procedures.

### 4.2 Observations and Findings

License Condition 20 requires, in part, that calibration of equipment be documented. The inspectors reviewed the licensee's instrument calibration records created since the last inspection. Equipment being calibrated included an assortment of radiological survey instruments and air samplers. The licensee had maintained documentation demonstrating that the equipment had been properly calibrated at the respective intervals specified in the license application. Equipment in use during the inspection

appeared fully functional with up-to-date calibrations. In summary, the licensee maintained a sufficient number of calibrated instruments necessary to implement the requirements of the license.

The licensee's radiation safety staff conducts daily inspections during normal work days to ensure general radiological control practices are being used. The RSO also performs a weekly inspection in restricted areas. The inspectors reviewed the documented inspections for 2008 through July 2010. No unusual radiological conditions were found that required corrective action.

#### 4.3 Conclusions

Radiation survey instruments and air samplers were being calibrated as required by site procedures. Daily and weekly radiological inspections were being performed.

### **5 Effluent Control and Environmental Protection (88045)**

#### 5.1 Inspection Scope

Determine if the environmental and effluent monitoring programs used by the licensee are adequate to monitor the impacts of site activities on the local environment.

#### 5.2 Observations and Findings

##### a. Environmental Monitoring

License Condition 10 requires, in part, that the licensee maintain an environmental monitoring program, and License Condition 19 requires, in part, that the licensee submit the results of the environmental monitoring to the NRC in semiannual reports. The licensee's environmental monitoring program is described in its Health Physics and Environmental Procedures Manual. The licensee's environmental monitoring program consisted of obtaining air particulate, radon, gamma radiation, soil, surface water, sediment, and vegetation samples.

The licensee has seven environmental monitoring sampling stations, which include two locations near the former Section 4 ponds. During the inspection, the inspectors noted that particulate monitoring station KGL-North, which is downwind of Section 4, had been recently turned off by the licensee. The licensee felt that, since Section 4 cleanup was almost completed, they were not obligated to continue particulate monitoring. After discussions with the inspectors, the licensee turned the particulate monitoring back on and agreed to request official NRC approval before discontinuing particulate monitoring near Section 4.

Air particulates were sampled at the seven environmental sampling stations, with the exception above, using high volume air samplers. The sample filters were exchanged weekly and analyzed quarterly for natural uranium, thorium-230, radium-226, and lead-210 concentrations. The inspectors reviewed the sampling results for the second half of 2008 through the first half of 2010. Most of the air sample results obtained by the licensee were determined to be less than one percent of the limit for each constituent, as each is specified in 10 CFR Part 20, Appendix B.

Radon-222 was monitored at the seven environmental sampling stations. The track-etch canisters were exchanged quarterly and processed by an outside vendor. Since 2008, the highest radon-222 reading was measured at the Section 30W VH6 location during the fourth quarter 2009 and resulted in an effluent concentration of 4.2 picocuries per liter. This sample result remained below the 10 CFR Part 20, Appendix B, effluent concentration limit of 10 picocuries per liter.

Gamma radiation was monitored at each of the seven environmental sampling stations. The dosimeters were exchanged quarterly and processed by an outside vendor. Since 2008, the highest gamma readings have been at the Section 30W VH6 sampling station. The highest quarterly rate was for the third quarter of 2008, with a measurement of 10.8 millirems.

Vegetation samples are collected three times a year near the seven environmental sampling stations. The vegetation samples were analyzed for natural uranium, thorium-230, radium-226, and lead-210 concentrations. No acceptance criteria have been established for vegetation; the environmental samples are collected for trending purposes only. The inspectors reviewed the sampling results from 2008 through the first quarter of 2010 and found no adverse trends.

Soil samples are collected annually at the seven environmental sampling stations. The soil samples are analyzed for natural uranium, thorium-230, radium-226, and lead-210 concentrations. No acceptance criteria have been established for soil; the environmental samples are collected for trending purposes only. The inspectors reviewed the soil sampling results from 2008 through the first quarter of 2010 and found no adverse trends.

Four creek bed sediment samples were collected annually and analyzed for natural uranium, thorium-230, radium-226, and lead-210 concentrations. The environmental sampling is conducted for trending purposes only. The inspectors reviewed the sediment sampling results from 2008 through the first quarter of 2010 and found no adverse trends.

License Condition 39 requires, in part, that the licensee conduct an annual land use survey in the area within 2 miles of the former mill and submit a report to the NRC by July 1<sup>st</sup> of each year. The inspectors reviewed the annual land survey reports submitted by the licensee for calendar years 2008-2010. Each report contained an adequate land use survey and no major changes were noted.

b. Groundwater Compliance Monitoring Program

License Condition 34 provides, in part, the requirements of the groundwater compliance monitoring program. In February 2006, the NRC approved the licensee's request for implementation of groundwater alternate concentration limits (ACLs) for several constituents. The inspectors reviewed the groundwater monitoring data from the second half of 2008 through the first half of 2010.

During November 2006, the licensee notified the NRC regarding the elevated beryllium concentrations observed in the Dakota Point of Compliance Well 36-06 samples. The licensee submitted a proposed corrective action plan to the NRC in January 2007 to address the elevated beryllium concentrations, a request that was subsequently

approved by the NRC in April 2007. During the second quarter 2007, the licensee also noted an elevated level of cadmium in Well 36-06. Since the discovery of the elevated beryllium and cadmium concentrations in Dakota Point of Compliance Well 36-06, the licensee has taken monthly water samples at this well, and results have shown a slow decline in beryllium and cadmium concentrations in the water.

In the July 31, 2008, semiannual groundwater monitoring report, the licensee noted the exceedance of the uranium concentration from Tres Hermanos B Compliance Well 31-02. All 2009 and 2010 uranium results were below the ACL of 1.6 milligrams per liter. The licensee has returned to quarterly sampling of Well 31-02.

### 5.3 Conclusions

The licensee had implemented the environmental monitoring program as required by the license and regulations. One compliance well was in exceedance of the ACLs and was being sampled monthly.

## **6 Inspection of Transportation Activities and Radioactive Waste Management (86740 and 88035)**

### 6.1 Inspection Scope

Determine if transportation and disposal activities were being conducted in compliance with regulatory requirements.

### 6.2 Observations and Findings

Two tailings ponds were used to dispose of tailings generated during uranium ore processing operations. Pond 1 contains about 30 million tons of mill tailings, covering 260 acres; Pond 2 contains 3 million tons of tailings, covering 90 acres. Both mill tailings ponds were covered with final radon barriers in 1995 and 1996, respectively, excluding a portion of Pond 2 which was still being used for byproduct material disposal. Tailings Pond 2 does not have a rock cover and final radon barrier on the northern end of the pond, because the licensee plans to continue to dispose of material collected from the lined pond projects into this portion of Pond 2.

Since the previous inspection, the licensee had not received nor shipped radioactive material. The licensee stated that they have no near future plans to ship any radioactive material off site.

### 6.3 Conclusions

The licensee was conducting transportation and waste disposal operations in accordance with license requirements.

## **7 Emergency Preparedness (88050)**

### 7.1 Inspection Scope

Determine if the licensee's emergency preparedness program was being maintained in a state of readiness.

## 7.2 Observations and Findings

The inspectors reviewed the August 2008 Health, Safety and Environment Training that is used for new employees and visitors not requiring unescorted access. The document contains site rules for working safely and includes transportation and traffic management. Visitor check-in requirements are noted, as is personal protection equipment for the site. The document also contains a quick reference guide for emergency situations, including up-to-date phone numbers for site and regulatory agencies. Sections of the document outline emergency evacuation procedures, the location of a first aid station and supplies, and awareness of the location of Material Safety Data Sheet information. Also noted are actions to take in case of fire, injuries and near misses, and hazardous material spills. ALARA requirements are also discussed. Samples of warning signs that exist at the site were also included. During site tours the inspectors noted emergency equipment and supplies to be adequate for current activity at the site. The licensee noted that, in the case of a significant medical emergency, a Life-Flight helicopter would be utilized to transport injured personnel.

## 7.3 Conclusions

The licensee had adequate procedures, equipment, and training needed to respond to emergencies.

## **8 Exit Meeting Summary**

The inspectors presented the preliminary inspection results to the licensee's representatives at the conclusion of the onsite inspection on July 14, 2010. The final inspection findings were presented to the site manager and RSO by telephone on August 31, 2010. Representatives of the licensee acknowledged the findings as presented. During the inspection, the licensee did not identify any information reviewed by the inspectors as proprietary.

**SUPPLEMENTAL INSPECTION INFORMATION**

**PARTIAL LIST OF PERSONS CONTACTED**

Licensee

T. Fletcher, Former President  
C. Wentz, Radiation safety Officer  
B. Ray, Site Manager

**ITEMS OPENED, CLOSED, AND DISCUSSED**

Opened

None

Closed

None

Discussed

None

**INSPECTION PROCEDURES USED**

IP 83822	Radiation Protection
IP 86740	Inspection of Transportation Activities
IP 88005	Management Organization and Controls
IP 88010	Operator Training and Retraining
IP 88025	Maintenance and Surveillance of Safety Controls
IP 88035	Radioactive Waste Management
IP 88045	Effluent Control and Environmental Protection
IP 88050	Emergency Preparedness

**LIST OF ACRONYMS USED**

ACL	alternate concentration limit
ALARA	as low as reasonably achievable
IP	NRC inspection procedure
NRC	Nuclear Regulatory Commission
RSO	radiation safety officer
µR/hr	microReontgen per hour