

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED:

The Doe Run Company
Viburnum, MO 65566

REPORT NUMBER(S) 2013-001

2. NRC/REGIONAL OFFICE

Region III
U. S. Nuclear Regulatory Commission
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

3. DOCKET NUMBER(S)

030-29604

4. LICENSE NUMBER(S)

24-24815-01

5. DATE(S) OF INSPECTION

July 16, 2013

LICENSEE:

The inspection was an examination of the activities conducted under your license as they relate to radiation safety and to compliance with the Nuclear Regulatory Commission (NRC) rules and regulations and the conditions of your license. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector. The inspection findings are as follows:

- 1. Based on the inspection findings, no violations were identified.
- 2. Previous violation(s) closed.
- 3. The violation(s), specifically described to you by the inspector as non-cited violations, are not being cited because they were self-identified, non-repetitive, and corrective action was or is being taken, and the remaining criteria in the NRC Enforcement Policy, to exercise discretion, were satisfied.

Two Non-cited violation(s) were discussed involving the following requirement(s):

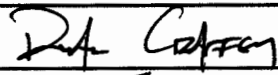
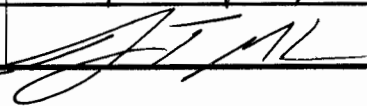
License Condition 15 requires, in part, that the licensee shall conduct a physical inventory every 6 months, or at other intervals approved by the Nuclear Regulatory Commission, to account for all sealed sources and/or devices received and possessed under the license.

License Condition 16 requires, in part, that each gauge shall be tested for the proper operation of the on-off mechanism at intervals not to exceed 6 months or at such longer intervals as specified in the certificate of registration issued by the U.S. Nuclear Regulatory Commission pursuant to 10 CFR 32.210 or the equivalent regulations of an Agreement State.

- 4. During this inspection, certain of your activities, as described below and/or attached, were in violation of NRC requirements and are being cited in accordance with NRC Enforcement Policy. This form is a NOTICE OF VIOLATION, which may be subject to posting in accordance with 10 CFR 19.11.
(Violations and Corrective Actions)

Statement of Corrective Actions

I hereby state that, within 30 days, the actions described by me to the Inspector will be taken to correct the violations identified. This statement of corrective actions is made in accordance with the requirements of 10 CFR 2.201 (corrective steps already taken, corrective steps which will be taken, date when full compliance will be achieved). I understand that no further written response to NRC will be required, unless specifically requested.

| TITLE | PRINTED NAME | SIGNATURE | DATE |
|---------------------------|--------------|--|---------|
| LICENSEE'S REPRESENTATIVE | | | |
| NRC INSPECTOR | Ryan Craffey |  | 7/22/13 |
| BRANCH CHIEF | Aaron McCraw |  | 7/26/13 |

Docket File Information

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| 6. INSPECTION PROCEDURES USED 87124 | 7. INSPECTION FOCUS AREAS All |
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SUPPLEMENTAL INSPECTION INFORMATION

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|---------------------------------|----------------------|---|---|
| 1. PROGRAM CODE(S) 03120 | 2. PRIORITY 5 | 3. LICENSEE CONTACT William Van Horn - RSO | 4. TELEPHONE NUMBER (573) 626-4855 |
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Main Office Inspection Next Inspection Date: July 2018

Field Office Inspection Bushy Creek, Fletcher and West Fork Mills

Temporary Job Site Inspection

PROGRAM SCOPE

This licensee is a lead, zinc, copper mining company authorized by its NRC byproduct materials license to use Cs-137 in fixed gauge applications at its facilities in Boss, Bunker, and Sweetwater, MO. The licensee currently possesses seven specifically licensed gauges: one in use at the Bushy Creek Mill, one in use at the Fletcher Mill, four in use at the Sweetwater Mill, and one in storage awaiting disposal at the West Fork Mill. The licensee also possesses one generally-licensed device for lead content analysis. Every six months, the licensee performs a physical inventory, at which time all gauge shutters are checked for operability. Every three years, the licensee performs leak tests of all sealed sources, the results of which are analyzed by an authorized third party. The RSO and his alternate, both located at the Buick Mill, supervise these activities, which are performed by mill instrumentation technicians. The licensee possesses one survey meter and calibrates it annually, and also provides dosimetry, exchanged quarterly.

PERFORMANCE OBSERVATIONS

The inspector toured the Bushy Creek and Fletcher Mills, and observed the condition and associated posting of two density gauges. Independent surveys conducted in the vicinity of these gauges found no unusual readings. The inspector interviewed the RSO and two instrument technicians, who all demonstrated adequate knowledge of radiation protection principles and practices. The inspector reviewed licensee records for inventory, leak testing, shutter checks, training, dosimetry, and audits of the radiation safety program.

During the review of inventory records, the inspector found that the licensee had not performed a physical inventory or shutter check of its gauges between the months of March 2008 and March 2009. License Conditions 15 and 16.A require the performance of physical inventories and shutter checks, respectively, at intervals not to exceed 6 months. The licensee identified these violations during an audit of the radiation safety program in March 2011, and took corrective action by establishing automated reminders in its office productivity software.

Because the licensee identified the violations and took corrective action, and because the inspector determined that the violations were non-willful and non-repetitive, the NRC has decided to disposition them as non-cited violations.