



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

PDR

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APR 23 1979

MEMORANDUM FOR: Ross A. Scarano, Section Leader
New Facilities Section
Uranium Recovery Licensing Branch
Division of Waste Management

THRU: *JJZ* John J. Linehan
Uranium Recovery Licensing Branch

FROM: Frank Lomax
Uranium Recovery Licensing Branch

SUBJECT: REVIEW OF FIVE YEAR COMPLIANCE HISTORY
FOR RENEWAL OF SOURCE MATERIAL LICENSE
NO. SUA-917, ATLAS MOAB URANIUM MILL

I have reviewed the 1.1 correspondence and inspection records related to this license from 1972 to the present. There have been 27 items of non-compliance during the review period. There are several compliance areas where trends are apparent from this review. The trends identified were in the areas of respirator use, administrative compliance, and management of mill tailings and effluent.

The six respirator related items in five years indicate that the licensee's understanding of the requirements for use of respirator equipment to reduce personnel exposure was inadequate prior to 1977. Review of I&E inspection report of September 7, 1978 indicates that an acceptable program in accordance with 10 CFR 20.103(c) and Regulatory Guide 8.15 was achieved in 1978.

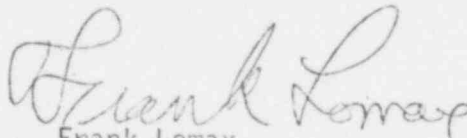
There were six items directly related to administrative compliance. These items and the associated inspection reports indicated a need for management attention to ensure that the requirements of 10 CFR 20 are met, and that changes to the regulations which occur are promptly and properly implemented. Review of more recent I&E inspection reports shows that the licensee has made substantive changes in the management areas which are designed to ensure that the plant manager and corporate officials are made aware of compliance requirements and that sufficient management attention is directed to the details of compliance with regulations and the contents of SUA-917.

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The licensee's management of mill tailings and effluent was the subject of several of the items of non-compliance over the period of this review. The licensee's problems in this area have generally been related to the changes necessary to allow for increased ore through put, increased height of the tailings dam, and seasonal variation in the rate of evaporation of the tailings pond liquid. There have been several recent improvements to the existing dam structure to improve the stability of certain sections and to provide sufficient operating capacity. While the tailings management area will continue to be an important issue at this site, the licensee has clearly improved his control over the transport and storage of tailings, and the modifications to the tailings dam recently agreed to and incorporated into this license renewal represent adequate resolution of the licensee's problems in this area.

The remainder of the items of non-compliance reviewed did not reflect broad areas where improvements are required, and were corrected prior to reinspection. I have telefaxed a copy of the proposed license, Enclosure 1, to Mr. Jerry Everett (I&E Region IV) for his review, and I went over my conclusions written above in a telephone conversation with Mr. Everett on Friday, March 16, 1979. After that discussion I am convinced that the items discussed above are essentially a record of the learning process experienced by the licensee during a five year period in which a number of changes to the requirements applicable to uranium mill licenses occurred. In addition, I am convinced that the licensee is presently operating in full compliance with regulations and the contents of SUA-917, and that the renewal of this license is reasonable and justified.



Frank Lomax
Uranium Recovery Licensing Branch
Division of Waste Management

Enclosure:
As stated

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