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A Unit of Getty Oil Company

July 10, 1980

U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive
Arlington, TX 76012

Gentlemen:

Pursuant to the provisions of Section 2.201 of the NRC "Rules of Practice", Part 2, Title 10, Code of Federal Regulations, we are in receipt of your notice of June 18, 1980.

Answers to the five (5) items of non-compliance are as follows:

1. "Failure to obtain NRC approval prior to transferring tailings."

approval of request
An administrative amendment was submitted on June 11, 1980 requesting that license condition 16 of license SUA-551 be amended to allow transfer of tailings to research facilities. This amendment should resolve any future problems which may have arisen regarding the transfer of tailings for research and analysis. Date of compliance was June 11, 1980.

2. "Failure to perform air sampling as stipulated in application."

approved by...
Minor changes in the mill circuits resulted in some sampling locations no longer existing or being useful. Corrective action for this item was to establish new sampling points and remove the locations that were no longer valid. The sampling points have been revised and page changes to licensee's submitted documents dated December 23, 1975 and March 10, 1976 have been prepared. All areas within this document which are affected by the change will also be revised to conform to the new sample locations. Any future changes will be handled in a like manner to avoid being in non-compliance. Compliance on this item will be reached by July 15, 1980.

3. "Failure to sample for radon in the mill."

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Radon - 222 measurements have been taken in all circuits of the mill. The maximum Radon - 222 level measured on July 9, 1980 was .006WL. A formal sampling procedure has been established and Radon - 222 sampling will be done on a monthly basis in all circuits. A monthly report of the results will be given to the Mill Superintendent for his review. Date of compliance for this item is July 9, 1980.

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4. "Failure to evaluate bioassay results exceeding action levels."

All bioassay results exceeding action levels are evaluated but the cases in question were not fully documented. Documentation of all urinary samples which exceed the limits established by the NRC letter dated June 23, 1978, is done by rerunning the sample in question, collecting an additional sample for analysis, and running a test for albuminuria. A copy of this report is then attached to the results received by the Mill Superintendent. The original report is filed in the employees exposure file with his urinalysis results. Onsite sample analysis has allowed us to provide better documentation because results are available within 48 to 72 hours after sample collection. Date of compliance of this item is June 3, 1980.

5. "Failure to properly select and test respiratory protection equipment."

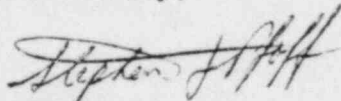
Respiratory protection equipment with a protection factor greater than any measured or anticipated multiple of the peak concentration of radioactive materials specified in Table 1, Column 1 of Appendix B to 10 CFR 20 was purchased in 1979. This equipment is used when conditions warrant the use of higher protection factor respirators. All personnel have been trained in the use of this respiratory protection device and the conditions under which it must be used. Date of compliance of this item was July 15, 1979.

Irritant smoke units have been placed at the entrance to areas where half mask respiratory protection is used. Employees have been instructed in smoke test procedures for the half-mask respirators and how to obtain a proper fit. Date of compliance of this item is July 9, 1980.

To avoid further items of non-compliance all statements, representations and conditions contained in our license are being reviewed by the Radiation Department staff. The Radiation Coordinator is currently in the process of preparing the application for license renewal, where possible programs are being simplified or updated and a number of management review procedures will be established to improve the effectiveness of our management control of the requirements of our license.

Full compliance will be achieved on or before July 15, 1980.

Sincerely,



Stephen J. Pfaff
Radiation Coordinator