

DOCKET NUMBER
PROPOSED RULE PR *MISC notice
Reg Guide*

PATHFINDER

Pathfinder Mines Corporation
Shirley Basin Mine
Shirley Basin, Wyoming 82615
(307) 356-4312

October 3, 1980



Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Docketing and Service Branch

Subject: Comments on Draft Regulatory Guide
Health Physics Surveys in Uranium Mills
Task OH 710-4

Dear Sirs

Attached are some comments on the subject draft regulatory guide.

The written guide appears to be consistent with past regulatory agency comments concerning license applications, and conditions put on licensees at the time of license renewals.

We believe it is possible to comply with this guide as presented at this time.

Very truly yours

Ralph F. Peak

Ralph F. Peak
Mill Superintendent

RFP:mk

Attachments

CC: J.E.Russell
R.S.O. File
L. Sandman
(Utah Int'l. Envir.)

8010310 **240**

Acknowledged by card... *10/15/80* ...

Comments on Draft Regulatory Guide "Health Physics Surveys in Uranium Mills" Task OH-710-4

The draft regulatory guide appears to be a straight forward attempt to set forth some reasonable guidelines for health physics surveys in uranium ore processing mills. There are some minor problems that are not critical to the overall document if it is issued as drafted.

Paragraph 1.5 Surveys for surface contamination - 5th sub paragraph beginning "visible yellow cake should be cleaned up promptly, Surfaces on which yellow cake may settle should be painted in contrasting colors to make the yellow cake more visible"

Comment: Under OSHA & MSHA rules the hand rails have to be safety yellow, which is very close to the color of freshly precipitated yellow cake. This is a case of the contrast colored paint required by one agency for safety being undesirable by another agency for different reasons of safety. However if the surfaces in any color are kept washed down by frequent hosing, nearly any color of paint is satisfactory for contrast. Grey and purple equipment colors with yellow hand rails are used at Pathfinder Mines, Shirley Basin Mill in Wyoming. The fresh yellow cake on grey or purple stands out like a tiger in a snow drift. The hand rails should be kept clean enough that there is no smearing onto the workers hands regardless of the paint color.

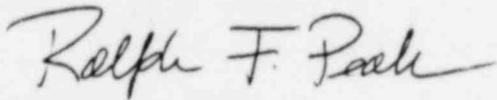
Uranium "yellow cake" after drying is more frequently a dark brown to nearly green - black in color and is evident on surfaces. Compliance with the surface contamination requirements and prevention of dust build ups in the yellow cake drying and packaging areas appear to keep the problem under control.

Paragraph 8 Protective clothing - Comment on laundry facilities - There are considerable difficulties with the problems of laundering contaminated clothing in off-site commercial laundries. The Shirley Basin Mill elects to furnish and launder coveralls for mill workers using an on-site washer and dryer. These coveralls are not allowed off the project.

The mill workers are also furnished disposable paper coveralls for particularly dirty clean up jobs in the yellow cake areas. We have had good cooperation from the worker personnel in the application of these procedures.

The investigation by us of the availability or non-availability of licensed off-site laundry facilities for potentially contaminated clothing led us to the installation of our on-site washing and drying equipment.

Our washer and dryers have a service life of approximately 15 months under these conditions of heavy use, i.e. 30 - 50 pairs of coveralls per day.



Ralph F. Peak
Mill Superintendent
Pathfinder Mines Corporation
Shirley Basin Mine
Shirley Basin, Wyoming 82615

License SUA-442