



FREEPORT CHEMICAL COMPANY • UNCLE SAM, LA. 70792

A DIVISION OF FREEPORT MINERALS COMPANY

DOCKET NUMBER *PR misc. notice*  
PROPOSED RULE *Reg. Guide*

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October 13, 1980

Docketing & Service Branch  
Secretary of the Commission  
USNRC  
Washington, D.C. 20555



Gentlemen:

RE: ALARA Draft Regulatory Guide

Freeport Chemical Company, a division of Freeport Minerals Company, is a major producer of phosphoric and sulfuric acids for fertilizer manufacturing and is located at Uncle Sam, Louisiana. We operate a facility that extracts uranium from phosphoric acid at Uncle Sam for Freeport Uranium Recovery Company, another division of Freeport Minerals Company.

We feel that our process that recovers uranium from phosphoric acid is significantly different from the process to recover uranium from ore that applying the Reg-Guide to our recovery facility would be inappropriate and would impose excessively burdensome record keeping requirements without any increase in worker protection. Our recovery facility is small compared with uranium mills. It is staffed with 28 production shift workers and 14 administrative, technical, and maintenance workers. Only two workers per shift work in the yellowcake area. Two to four maintenance day workers perform maintenance in the yellowcake area occasionally as required.

The Reg-Guide stipulates that the Radiation Safety Officer (RSO) for the recovery facility have a year of experience in applied health physics and a year of experience in a uranium mill or related facility. This requirement means that when Freeport started up the recovery facility, we would have had to hire away a qualified individual from another organization. Also, if we had to replace our current RSO, we would have to do the same thing. The health physics program for our facility does not require a full time RSO to run it. We feel that it would be more realistic for the licensee to demonstrate that their RSO is qualified. Additionally, a full time Health Physics Technician (HPT) for our recovery facility is superfluous. Our experience has shown that backup for our RSO during his absences can be provided by experienced laboratory technicians who have been trained.

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

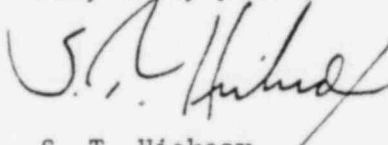
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The Reg-Guide stipulates a number of inspections and reports of inspections. Inspections are no substitute for good housekeeping practices. We conduct semi-weekly inspections for contamination with follow-up and monthly swipe tests. These have proven adequate to control contamination. Additionally, the facility shift foremen have housekeeping responsibilities. The proposed semi-annual ALARA Program Audit is a comprehensive compilation of health physics activities. This compilation is unnecessary as the records are available for inspection. The report would be time consuming and would provide no additional protection for the worker.

It is readily apparent that this draft Reg-Guide is written for a uranium mill. The radiological health hazards in our recovery facility are limited to a small section of the plant. Parts of the Reg-Guide, respiratory protection, bioassay program, facility design, and basic radiation safety training, reflect good health physics practices. However, many others mandate excessive recordkeeping requirements and detailed inspections procedures that are better left to the applicant's discretion. We feel that this draft Reg-Guide is inappropriate for application to our recovery facility and that licensing of this type should proceed on a case-by-case basis.

Very truly yours,



S. T. Hickcox  
Industrial Hygienist

STH/sb