



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

OCT 27 1980

Ref: SA/CG

Dr. Ted Wolff, Chief  
Radiation Protection Section  
Environmental Improvement Division  
P.O. Box 968  
Crown Building  
Santa Fe, New Mexico

Dear Dr. Wolff:

This letter and a copy of the letter to Mr. Baca, copy attached, confirm the comments made to you regarding the recent regulatory program review held by Mr. Kendig and Mr. Gordon.

Our review this year focused on the administrative aspects of the radiation control program and the regulatory program for uranium milling. We were unable to complete all that we intended and consequently, as discussed with you, we will continue the review during the week of November 4, 1980. Upon completion of the November review we will offer our recommendation for adequacy and compatibility.

In discussions with the Grants Office, we noted some improvement in the licensing files but they are not complete and up to date. The Grants Office has not yet organized all information and supporting documentation for licenses for uranium mills.

We commented on written procedures for the staff on escalated enforcement actions which had not been prepared as recommended in the letter of January 14, 1980 from G. W. Kerr to your office. We understand that you are preparing a response which offers an explanation as to why written procedures for escalated enforcement actions as stated in our letter are not necessary for the program.

Comments were provided to you on the inspection of the United Nuclear Homestake Partners (UNHP) uranium mill. Overall, the accompaniment of the inspectors indicated the staff is capable of performing adequate inspections. We believe improvements can be made, however, in the preparation for the inspection, especially to become thoroughly familiar with the license and its supporting documents.

Because of the long period the UNHP license has been under timely renewal, there was confusion amongst the compliance staff as to what letters and other correspondence were incorporated into the license by the tie-down condition. In addition, we noted that there is no bioassay program being conducted at the facility because the license does not require it. Although this license is

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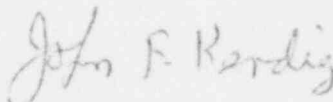
awaiting renewal, we recommend the license be immediately amended to require a bioassay program since renewal of the license may be sometime into the future.

Detailed comments on technical, licensing, and environmental aspects of the Gulf Mt. Taylor project were provided to the staff. Similar comments were made relating to the Bokum Marquez facility's in-plant safety assessment performed by the State.

I would appreciate your review of our findings and would like to receive your comments on them. The completion of our State review is scheduled for November 4-8, 1980. I am enclosing a copy of a letter to Mr. Baca with certain recommendations on the program.

I appreciate the courtesy and cooperation extended to Messrs. Gordon and Kendig during their meeting with you and your staff.

Sincerely,



*for* Joel O. Lubenau  
Acting Assistant Director  
for State Agreements Program  
Office of State Programs

Enclosures:  
As stated

cc: Tom Baca  
Cubia Clayton  
NRC Public Document Room  
State Public Document Room