

40-8781

UNC TETON EXPLORATION DRILLING, INC.

PDR



Subsidiary of United Nuclear Corporation
A **UNC RESOURCES** Company

P.O. Drawer A-1
Casper, Wyoming 82602

Telephone 307/265-4102

May 8, 1981

Mr. Roger Woolsey
Operational Safety Division
U.S. Nuclear Regulatory Commission
Mail Stop 483-SS
Washington, D.C. 20555

Dear Roger:

RE: DOCKET NO. 40-8781

Per your telephone request this a.m., please find enclosed one complete copy of the Teton Exploration Drilling, Inc.'s Health Physics Manual. This copy has been forwarded to you directly in order to assist you in your review of the above referenced application. In addition I have mailed five more copies to the Documents Office under separate cover.

The questions provided at the time John Lenhan and crew visited Casper are enclosed and are accompanied by the locations of the information necessary to answer them.

Thank you for your attention to this matter. Please call me at any time a question arises or more information is needed.

Sincerely,

Richard R. Appel
Permits Coordinator

dkt
enclosures
xc: Fred Ross

C

8106100 14.1

10064

RADIATION HEALTH AND SAFETY QUESTIONS

1. Define the responsibilities of the Site and Corporate Radiation Safety Officers and Technicians.

Radiation Safety Officer

Function: Establish and monitor the application of programs to provide industrial safety, radiation protection and environmental controls and procedures to maintain company regulatory compliance to minimize potential hazards to employees, company facilities and the environment. Monitor operations to determine adequacy of, and to ensure consistent application of established industrial safety, radiation and environmental protection procedures, and perform necessary regulatory compliance monitoring.

Establish and assist in the maintenance of accurate and timely personnel and environmental records as required by applicable federal and state regulations. Establish and assist in providing training and instructions to personnel on industrial safety, and on the proper handling of and protection from radioactive materials.

Assist in conducting routine training programs for management, Line Supervisors and employees with regard to the proper application of industrial safety, radiation protection and environmental control procedures and requirements. Provide training and instruction to Technical personnel to enable them to perform both routine and emergency functions. Assist in the preparation of reports required by Federal and State regulatory agencies. Temporarily stop, through management and line supervision, any process, operation or activity which will or may credibly cause significant risk to employees, company facilities or the environment. Develop monitoring, sampling and analytical methods that are efficient and cost effective. Analyze requirements for safety and/or nuclear instrumentation and equipment and make recommendations for purchase thereof.

Site Radiation Protection Officer

Function: Establish and monitor the application of programs to provide industrial safety, radiation protection, and environmental controls and procedures to maintain site regulatory compliance and to minimize potential hazards to site employees, plant facilities and the environment. Monitor plant operations to determine adequacy of, and to ensure consistent application of established industrial safety, radiation and environmental protection procedures and perform necessary regulatory compliance monitoring. Maintain accurate and timely personnel and environmental records as required by applicable Federal and State regulations. Provide training and instructions to site personnel on industrial safety, and on the proper handling of line supervisors and employees with regard to the proper application of industrial safety, radiation protection and environmental control procedures and equipment. Provide training and instructions to technicians to enable them to perform

both routine and emergency functions. Assist in the preparation of reports required by Federal and State regulatory agencies. Temporarily stop, through line supervision, any process operation or activity which will or may credibly cause significant risk to employees, plant facilities or the environment. Develop monitoring sampling and analytical methods that are efficient and cost effective. Analyze requirements for safety and/or nuclear instrumentation and equipment and make recommendations for purchase thereof.

Technicians

Function: Perform the necessary functions as directed by the RPO/RSO.

2. The Site Radiation Safety Officer daily and monthly inspection program.

The procedures in Section XXIV of the Health Physics Manual provides weekly walk through inspections by the RSO.

3. Alara Audit and Report.

Answered by Section XXIV of the Health Physics Manual.

4. Specified operating procedures -- reviewed by the RSO yearly.

Procedures outlined in Section XXIV.

5. Radiation Work Permits, approval by the RSO.

Section IX outlines Radiation Work Permits and Approvals.

6. Use of protective clothing.

Protective clothing is referred to throughout the Health Physics Manual in applicable sections.

7. Safety Meetings.

Safety meetings are conducted per MSHA regulatory requirements.

8. Airborne sampling in yellowcake areas for natural uranium.

Procedures outlined in Section XII of the Health Physics Manual are used with a twenty-four hour decay and the assumption that gross alpha count is all natural uranium.

9. Bioassay, routine monthly samples on the process workers.

The bioassay procedures are outlined in Section XXI of the Health Physics Manual.

10. Time Weighted Exposure factors and time studies.

Time weighted exposures are calculated and covered under specific procedures applicable in the Health Physics Manual.

11. Contamination surveys of people and areas are not adequate. Use Branch Position and not ANSI N 326.

The branch position procedures are reflected in the preparation in the Health Physics Manual.

12. Calibration and operational checks of detectors and samplers.

Procedure for calibration is outlined in Section XVIII in the Health Physics Manual.

13. Will require the first six months survey data.

Teton understands that the first six months of survey data taken in the plant when operations begin will be submitted to the NRC.

In addition to the Health Physics Manual, a great portion of Chapter 5 of the Source Material License Application and Environmental Report has been rewritten in anticipation of formal NRC comments. Once these comments have been received the appropriate revisions will accompany materials which is submitted to the NRC. Sections which have been revised are:

5.7.2	External Radiation Monitoring Program
5.7.3	Airborne Radiation Monitoring Program
5.7.4	Exposure Calculations
5.7.5	Bioassay Program
5.7.6	Contamination Control Program
5.7.7	Airborne Effluent and Environmental Monitoring Program