

APPENDIX B

NOTICE OF VIOLATION

Atlas Corporation
Atlas Minerals Division

Docket: 40-3453
License: SUA-917

As a result of the NRC appraisal conducted on May 11-15, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

1. License Condition 25(c) requires that if contamination levels in lunch rooms, shower rooms, change rooms, or offices exceed the values in License Annex C, dated November 1976, the area shall be decontaminated immediately and a study performed to determine the cause of buildup and corrective measures taken to prevent recurrence. Annex C states that the limit for maximum fixed alpha contamination is 15,000 disintegrations per minute per 100 square centimeters.

Contrary to this requirement, contamination levels in excess of this limit were present in the acid filter doghouse, a lunch room and office area, during March, June, and July, 1980, and corrective measures were not taken to prevent recurrence. A study was not performed by the licensee to determine the cause of the buildup.

This is a Severity Level IV violation (Supplement VI.D.3).

2. License Condition 39 requires, in part, that the licensee shall conduct isokinetic sampling of the yellowcake drying and packaging stacks.

Contrary to this requirement, such sampling had not been performed by an isokinetic method since January 1980.

This is a Severity Level IV violation (Supplement VI.D.3).

3. License Condition 46 requires, in part, that the licensee shall, during all periods of yellowcake dryer operations, assure that the scrubber is operating within the manufacturer's recommended ranges for water flow and air pressure differential necessary to achieve design performance. These operational checks may be accomplished by either performing hourly checks on the scrubber unit or installing remote instrumentation that will signal an audible alarm in an occupied area of the mill or offices. If an audible alarm is used, its function shall be checked daily. All hourly checks of the scrubber unit or daily checks of the alarm system shall be documented.

Contrary to these requirements, remote instrumentation, installed by the licensee, signals an audible alarm as a result of temperature changes rather than as a result of changes in water flow and air pressure differential. Daily checks of the alarm system have been neither performed nor documented, since the license condition was issued.

This is a Severity Level IV violation (Supplement VI.D.3).

4. 10 CFR 20.103(b)(1) requires that the licensee shall, as a precautionary procedure, use process or other engineering controls, to the extent practicable, to limit concentrations of radioactive materials in air to levels below those which delimit an airborne radioactivity area as defined in 10 CFR 20.203(d)(1)(ii).

Contrary to this requirement, the licensee had not undertaken efforts to reduce dust accumulations in airborne radioactivity areas located within the ore crushing and storage areas.

This is a Severity Level IV violation (Supplement VI.D.3).

5. 10 CFR 20.201(b) requires that each licensee shall make or cause to be made such surveys as may be necessary for him to comply with the regulations in 10 CFR Part 20.

Contrary to this requirement,

- (a) Adequate surveys had not been performed to assess worker exposure to airborne uranium in accordance with 10 CFR 20.103(a). Specifically, sampling had not been performed in a manner which would yield results representative of airborne uranium concentrations inhaled by mill workers.
- (b) Surveys had not been performed in accordance with 10 CFR 20.106(a) to evaluate radioactivity in airborne effluents released to unrestricted areas north of the mill complex.

This is a Severity Level IV violation (Supplement VI.D.3).

6. License Condition 34 requires, in part, that the licensee shall insure that the automatic sprinkler system installed in the solvent extraction area is maintained in an operational condition to provide control over solvent fires in the storage tanks.

Contrary to this requirement, on May 11-15, 1981, sprinkler heads were encrusted with mineral deposits which would have prevented their operation.

This is a Severity Level V violation (Supplement VI.E).

7. 10 CFR 20.203(d)(2) requires that each airborne radioactivity area shall be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words:

CAUTION (or DANGER)
AIRBORNE RADIOACTIVITY AREA

Contrary to this requirement, the ore crusher area known to be an airborne radioactivity area was not so posted on May 11-15, 1981.

This is a Severity Level VI violation (Supplement VI.F).

Pursuant to the provisions of 10 CFR 2.201, Atlas Minerals is hereby required to submit to this office within 30 days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) the corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation. Consideration may be given to extending your response time for good cause shown. The responses directed by this Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Dated _____


Glen D. Brown, Chief
Technical Inspection Branch