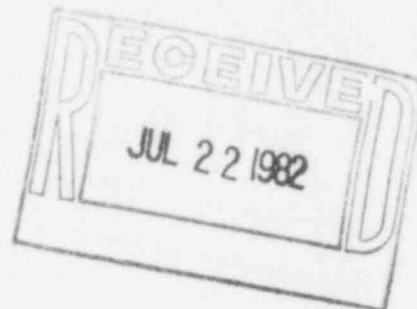


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July 20, 1982



Glen D. Brown, Chief  
Technical Program Branch  
U.S. Nuclear Regulatory Commission  
Region IV  
311 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76012

Re: May 25-27, 1982 Routine Safety Inspection  
NRC Source Material License SUA-917  
Docket 40-3453

Dear Mr. Brown:

This replies to your June 23, 1982 correspondence regarding the routine safety inspection conducted by Messrs. C. L. Cain and N. M. Shopenn on May 25-27, 1982 of the activities authorized by the NRC Source Material License SUA-917.

In accordance with the provisions of Section 2.201 of the NRC "Rules of Practice", Part 2, Title 10, Code of Federal Regulations, the following responses address each of the four violations observed during the subject inspection.

ITEM 1.

NRC: Contrary to License Condition 28, environmental air samplers were not calibrated between September 1981 and March 1982.

RESPONSE: The environmental air samplers were not calibrated during the last quarter of 1981 because the Kurz calibration device used for this purpose had been returned to the manufacturer for recalibration and was not returned for several months. However, it was returned in time to allow calibration of the environmental air samplers on February 28, 1982 by our Radiation Technician, Mr. J. Johnson. A copy of this calibration can be produced at your request.

In order to avoid this situation in the future, Kurz International, Inc. has been notified that the extended turn-around time is unacceptable

and they have agreed to be more responsive to our needs. As a contingency measure, we have made arrangements to acquire a calibrator on a loan basis, if needed, as a substitute for our own.

These measures and our increased diligence regarding this matter will insure continuing compliance.

ITEM 2.

NRC: Contrary to 10 CFR 20.103(b)(2), actions were not taken sufficient to prevent ten occasions of recurrence (exposure to airborne concentrations of ore dust in excess of the forty-hour control measure) during subsequent weeks of May and June 1981.

RESPONSE: Corrective action on this item was initiated May 20, 1981, and completed June 29, 1981. This action consisted of: (i) cleaning up the crushing and sampling areas (5/21/81), and (ii) complete wash down of the inside of the crusher building (6/29/81). The latter activity takes considerably more planning and attention to detail due to the nature and age of the facility. All electrical components must be thoroughly protected from water during this procedure.

In order to allow for the necessary planning and scheduling of this activity, weekly air samples are now being collected in the crushing and sampling areas. Trends in the airborne concentrations are more closely monitored, thus allowing for early detection of the need for extensive cleaning and wash down with water.

Full compliance was achieved in July 1981 and this violation should not reoccur.

ITEM 3.

NRC: Contrary to 10 CFR 20.103(c), allowance for the use of full-face particulate respirators with a protection factor of 50 was made during work in airborne concentrations ranging from 70 to 83 times the 10 CFR 20, Appendix B, limit for natural uranium, on three occasions during August through October of 1981.

RESPONSE: This program deficiency was corrected with a memo from Dale Edwards, Radiation Safety Coordinator, to the Radiation Technicians on May 28, 1982, instructing them to issue or require either Racal Airstream

respirators or air-line respirators for nonroutine work in the crusher area. Both respirators have a protection factor of 1000.

With the respiratory protection procedures now the same in the crusher as in the yellowcake hearth, and cleaner conditions being maintained in this area, we do not anticipate any further violations of this regulation.

ITEM 4.

NRC: Contrary to 10 CFR 40.64(b), annual statements of source material inventory were not submitted to the Commission during 1980 and 1981.

RESPONSE: The 1980 and 1981 source material inventory reports are in the process of being filed. They should be filed by July 30, 1982. The 1982 inventory report will be filed in accordance with 10 CFR 40.64(b). Administrative procedures have been established to provide advance notification and ample time to complete the inventory reports in a timely manner. This violation should not reoccur.

We appreciate the courteous and professional manner in which this inspection was conducted. We were also gratified to see that our improvements and comments relative to the previous inspection did not go unrecognized.

Trusting this satisfied your needs, I am,

Very truly yours,



Richard E. Blubaugh  
Regulatory Affairs Manager

REB:cf

cc: Mr. Pete Garcia  
Mr. R. R. Weaver  
Mr. W. M. Jensen  
Mr. D. L. Edwards