



40-3453

RETURN ORIGINAL TO PDR, HQ

# ATLAS CORPORATION

Republic Plaza, 370 Seventeenth Street, Suite 3150  
Denver, CO 80202  
Telephone: (303) 825-1200 Fax: (303) 892-8808

RICHARD E. BLUBAUGH  
Vice President of Environmental  
and Governmental Affairs

December 22, 1993

CERTIFIED

Mr. Ramon Hall  
U.S Nuclear Regulatory Commission  
Uranium Recovery Field Office  
P.O. Box 25325  
Denver, CO 80225

DOCKETED  
DEC 27 1993  
USNRC  
MAIL SECTION  
DOCKET CLERK

93 DEC 27 09:11

URFO  
RECEIVED

Re: License No. SUA-917  
Docket No. 40-3453  
Release and Retrieval Procedures

Dear Mr. Hall:

As discussed during the December 16, 1993 meeting wherein Atlas proposed certain procedures for the release of material from the Moab Mill, this letter submits the procedures, as revised, for the NRC's review and approval.

The procedures expand section 4.4 of Atlas' Radiation Safety Procedures Manual for the Moab Mill. Adherence to the revised procedures will preclude the release of materials contaminated with low-level radiation in excess of the NRC standards specified in the document, "Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use or Termination of License for Byproduct of Source Materials" dated September, 1984.

Included in the procedures is a new section dealing with the retrieval of contaminated material which may have been released from the mill site. We are also providing a checklist and a new release survey form. A key change in the procedures is the survey assistance and auditing to be performed by an independent contractor who is experienced with the proposed methods and procedures.

Atlas will not release material from the Moab Mill until we receive approval of the procedures from the NRC, or unless specific approval is given by the NRC.

DESIGNATED ORIGINAL

9402220229 931222  
PDR ADOCK 04003453  
C PDR

Certified By *Mary C. Hood*

DF02

94-0143 111

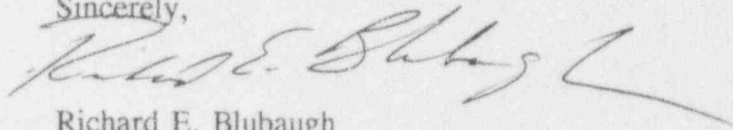
Mr. Ramon Hall  
Release/Retrieval Proc.  
December 22, 1993  
Page Two

Also enclosed with this submittal is a document which addresses the retrieval of contaminated materials which may have been released from the Moab Mill. This can be considered a 'living report' which will be updated and submitted on a monthly basis, provided changes have been made, until this matter is deemed closed by the NRC.

Atlas and its contractor, American Reclamation and Dismantling Inc., look forward to receiving approval for future releases of material from the mill site. We will continue to work with the buyers and appropriate state agencies to retrieve and/or decontaminate those materials that are contaminated with byproduct or source material.

We appreciate the consideration and cooperation extended to Atlas during this situation. We believe the proposed procedures and ongoing activities will prevent future problems and remedy any existing concerns about contaminated materials from the Atlas Moab Mill.

Sincerely,

A handwritten signature in dark ink, appearing to read "Richard E. Blubaugh", with a long horizontal flourish extending to the right.

Richard E. Blubaugh

cc: M. Gross  
S. Manz  
R. Mori  
N. Savignac

Subject 4.0 SAMPLING LOCATIONS, FREQUENCIES, AND ANALYSES	ATLAS MINERALS Radiation Safety Procedures Manual	Revision Date	Approval
--	---	------------------	----------

#### 4.4 Release of Equipment from the Mill During Decommissioning

Source Materials License No. SUA-917, condition 18 states: "Release of equipment or packages from the restricted area shall be in accordance with the document entitled, 'Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use or Termination of License for Byproduct or Source Materials' dated September, 1984. [Applicable Amendments: 18] [NRC, 1984]." That document presents the NRC standards for release of material and equipment from a uranium mill and is attached.

This section presents the procedures for how to survey equipment and material prior to release from the Atlas mill, and how to retrieve contaminated materials which may have been released from the mill. See Section 5.4 for how to operate the survey meters, Section 6.3 for how to calibrate alpha survey meters, Section 6.4 for how to calibrate beta detectors, and Section 6.5 for how to calibrate gamma detectors.

##### Equipment

1. Alpha scintillation survey meter.
2. GM survey meter with beta-gamma, gamma probe.
3. Filter paper wipes (50 mm), or the equivalent.
4. Gas-flow proportional counter, or the equivalent.

##### Equipment and Material Handling and Movement

1. Before any potentially contaminated item can be removed from the restricted area of the mill, the alpha and beta-gamma radiation levels must be surveyed. If those levels are below the NRC release standards, the Radiation Control Coordinator or his designee will authorize release of the equipment or materials from the mill. Potentially contaminated items include any equipment, supplies, and structural materials that have been in contact with radioactive materials possessed by Atlas Minerals Corporation under Materials License SUA-917. In general items located inside the restricted area of the mill are considered potentially contaminated. Items outside the restricted area such as office furniture are not considered potentially contaminated unless specific information is

Subject 4.0 SAMPLING LOCATIONS, FREQUENCIES, AND ANALYSES	ATLAS MINERALS Radiation Safety Procedures Manual	Revision Date	Approval
--	---	------------------	----------

2. Identify the source (location) of any item to be removed from the mill. Items from the precipitation and packaging area of the mill have a high probability of being sufficiently contaminated to preclude release without significant decontamination. Visually inspect each item to ascertain that all surfaces can be monitored with the probe of the alpha survey meter. This is the first of 8 inspection-hold points in the equipment survey procedure where items may be held in the restricted area of the mill and not released. Select only items that meet the following standards from NRC, 1984:

"The radioactivity on the interior surface of pipes, drain lines, or ductwork shall be determined by making measurements at all traps, and other appropriate access points, provided that contamination at these locations is likely to be representative of contamination on the interior of the pipes, drain lines, or ductwork. Surfaces of premises, equipment, or scrap which are likely to be contaminated but are of such size, construction, or location as to make the surface inaccessible for purposes of measurement shall be presumed to be contaminated in excess of the limits."

Small pipes with an internal diameter less than approximately twice the width of the alpha probe, assembled pumps, and assembled screw conveyers are examples of items that will not be surveyed and will automatically be rejected. A sealed electric motor with no openings between the inner and outer surfaces will have to be specially evaluated by the radiation survey personnel prior to monitoring.

3. Plan ahead. Schedule the removal, washing, survey, and truck transport of material from the mill site. Contact the radiation survey personnel to schedule the surveys. Contract radiation survey personnel are available on specific days each week and need two days advance notice of monitoring. They can provide estimates of the time required for the surveys. Allow time in the schedule for washed items to completely dry before monitoring, because alpha particles from surface contamination will not penetrate

Subject 4.0 SAMPLING LOCATIONS, FREQUENCIES, AND ANALYSES	ATLAS MINERALS Radiation Safety Procedures Manual	Revision Date	Approval
--	---	------------------	----------

water on the surface of the items.

4. The decontamination pad is the old concrete ore storage pad inside the restricted area of the mill. Wash the pad each week when the pad is in use. The wash water is contained and controlled from this area. Wash the items to be surveyed. Visually inspect the washed items to be sure grease or crusted deposits do not remain on the items. This is the second of 8 inspection-hold points. Dirty items will not be monitored and must remain in the restricted area of the mill. Items with a low probability of being contaminated, such as equipment from the mill water supply system, may with the consent of the Radiation Control Coordinator be inspected and surveyed directly without washing.
5. Avoid dragging the items in the dirt which can recontaminate items already cleaned. Separate the items to be surveyed so that the items can be turned over to survey all sides. Atlas and/or the demolition contractor are to provide pry bars, chains, fork lifts, and personnel as needed to move large pieces of equipment for surveying. KEEP THE AREA CLEAN. Radiation survey personnel will not survey items that are oily, greasy or dirty.
6. Place an identifying number with a paint pencil or other making tool on each piece of equipment that does not have a serial number. Numerous pieces of similar scrap such as pieces of "I" beams do not have to be individually numbered but have to be individually surveyed.
7. FOR EACH ITEM measure the alpha, and beta-gamma levels on the accessible surfaces of each item using only calibrated survey meters. See Section 5.4 for how to operate the survey meters, Section 6.3 for the procedures for alpha detector calibration, Section 6.4 for beta detector calibration, and Section 6.5 for gamma detector calibration. Record the ID number, the average counts per minute (CPM) and the maximum CPM on form AT-1. Record that data for each individual item surveyed except for numerous pieces of similar scrap where the data need only be recorded for 25% of the similar items surveyed. If the maximum CPM exceeds 75 CPM above background perform a wipe test as specified in Section 5.4 and record the results on form AT-1. The Atlas Control Value of 75 CPM above background was derived by:



Subject 4.0 SAMPLING LOCATIONS, FREQUENCIES, AND ANALYSES	ATLAS MINERALS Radiation Safety Procedures Manual	Revision Date	Approval
--	---	------------------	----------

$$\frac{(1000 \text{ DPM})}{100 \text{ cm}^2} (50 \text{ cm}^2) \frac{(0.2 \text{ CPM})}{\text{DPM}} = 100 \text{ CPM}$$

$$\approx 75 \text{ CPM} = \text{Atlas Control Value}$$

Where:

$\frac{1000 \text{ DPM}}{100 \text{ cm}^2} =$  The release limit for removable contamination.

$50 \text{ cm}^2 =$  Surface area of probe.

$0.2 \frac{\text{CPM}}{\text{DPM}} =$  Efficiency of Alpha survey meter.

8. On each side of an item that is surveyed place a spot of white spray paint or other identifying mark. Do not cover any contamination with spray paint. Turn each item over to gain access to the unsurveyed side. Survey as in #7 above and place the spot of paint on the side just surveyed. Record the result on Form AT-1 if higher than the results obtained in #7 above. Visually verify that a monitoring mark (white spot) has been placed on all sides of the item being surveyed. This is the third of 8 inspection-hold points.
9. Count the alpha activity on the wipe samples and record on AT-1. Convert the CPM alpha to DPM/100 cm<sup>2</sup> by:
 
$$\frac{(\text{CPM}) (100 \text{ cm}^2)}{50 \text{ cm}^2} \left( \frac{1}{\text{eff.}} \right) = \text{DPM}$$
10. Compare all the DPM/100 cm<sup>2</sup> results on form AT-1 with the NRC release standards in NRC, 1984. If the survey results are less than the NRC release standards, the item is considered suitable for release. Mark the releasable items using a spot of fluorescent orange paint, or the equivalent. The same mark should be used by each member of the survey team. Record the mark used on form AT-1. Periodically change the color and symbol used to designate that items are not contaminated.
11. If the item is contaminated (above NRC standards), DO NOT REMOVE from the restricted area.

Subject 4.0 SAMPLING LOCATIONS, FREQUENCIES, AND ANALYSES	ATLAS MINERALS Radiation Safety Procedures Manual	Revision Date	Approval
--	---	------------------	----------

12. AS SOON AS POSSIBLE move the releasable items out of the restricted area of the mill into the equipment transfer yard near the front door of the mill office building. After the transfer is completed lock the transfer yard gate and the restricted area gate. Alternately load releasable items directly onto monitored trucks for transport offsite. Monitored releasable items should not remain on the decontamination pad for more than approximately 10 working days. Monitor the trucks before leaving the restricted area as specified in procedure 14 below. Keep the gates to the restricted area closed and locked when Atlas personnel are not in the vicinity.
13. Keep the equipment transfer yard locked except when transferring releasable items into and out of the yard. During months when equipment and materials are being placed in the transfer yard, conduct a beta-gamma survey of the yard surface. Remove any contamination above the NRC release standards.
14. Before leaving the restricted area of the mill, vehicles must be monitored for radioactive materials. This is the fourth of 8 inspection-hold points. Vehicles include all moving equipment such as beam shearing equipment, backhoes, and trenchers. Monitor the areas most likely contaminated such as tires, tracks, wheel wells, cab floors, etc. Record the monitoring results on form AT-1. Vehicles that make several trips each day from the restricted area to the equipment transfer yard need only be monitored before the first trip and after the last trip on a given day. Equipment and vehicles used extensively in the restricted area of the mill are monitored before being released from the restricted area. Include in that monitoring a survey of the paper air filters used on the equipment.
15. Monitor equipment such as front-end loaders used to move releasable items on the decontamination pad before the releasable items are moved. This is the fifth of 8 inspection-hold points. If the front-end loaders, etc. are used for other purposes during a day, that equipment must be resurveyed before handling releasable items again.
16. Monitor all empty trucks used to transport releasable equipment from the equipment transfer yard to off-site locations. This is the sixth of 8 inspection-hold points.

Subject 4.0 SAMPLING LOCATIONS, FREQUENCIES, AND ANALYSES	ATLAS MINERALS Radiation Safety Procedures Manual	Revision Date	Approval
--	---	------------------	----------

Measurements of potential contamination on the bed of the trucks are to be recorded on form AT-1. Determine that the trucks are radiologically clean (under the NRC release limits) before any equipment is loaded on the truck. DO NOT USE the spray paint markers on the trucks.

17. After the trucks have been loaded a radiation survey person is to visually inspect the load and verify that all equipment is marked as releasable. This is the seventh of 8 inspection-hold points. Have any unmarked equipment removed from the truck.
18. Conduct a final, spot check or random, contamination survey of the truck and its load. This is the eighth of 8 inspection-hold points. Monitor select pieces of equipment and the wheels of the truck. If the survey indicate that the loaded truck is not contaminated, the radiation survey person is to enter and sign the following certification on the bill of lading:

AUTHORIZATION FOR RELEASE OF EQUIPMENT AND MATERIALS

I certify that this truckload of equipment and materials meets the Nuclear Regulatory Commission standards for "Acceptable Surface Contamination Levels" for radioactive materials (NRC release criteria) at the point of departure and may be released for transport from Atlas Minerals. For further information contact Atlas Minerals, Moab, UT (801) 259-5131 or Atlas Minerals, Denver, CO (303) 825-1200.

\_\_\_\_\_  
Radiation Survey Technician      Date

Retrieval of Contaminated Material Released from Atlas Minerals

1. When Atlas Minerals becomes aware that equipment and materials contaminated with radioactive materials, in excess of the NRC release standards (NRC, 1984), have been released from Atlas Minerals, the Corporation will contact the buyers of the contaminated items to request available information



Subject 4.0 SAMPLING LOCATIONS, FREQUENCIES, AND ANALYSES	ATLAS MINERALS Radiation Safety Procedures Manual	Revision Date	Approval
--	---	------------------	----------

on the type, quantity, and contamination surveys results.

2. Conduct a radiation survey of the potentially contaminated items if the initial contamination survey is inaccurate, incomplete, or suspect. The survey is to be conducted by the buyer, state or federal radiation survey personnel, a third party such as a radiation protection consultant, or by Atlas radiation survey personnel. Use the radiation survey procedures in this document or the equivalent.
3. Return to Atlas Minerals in Moab, UT the items found to be contaminated above the NRC release standards (NRC, 1984). Adhere to the Department of Transportation regulations for the shipments of radioactive materials. Alternatively decontaminate the contaminated items using decontamination techniques commonly used in the nuclear industry. If the residual activity on the items is below the NRC release standards, release the items for unrestricted use. Handle and dispose of the radiological waste from the decontamination process as specified in the State and NRC regulations or return the contaminated waste to Atlas Minerals.
4. Contact the radiological control personnel in the state or country where the contaminated items are found or suspected. Ask if they have received any information about the location and contamination levels on any potentially contaminated items. Seek their advise on potential corrective actions.
5. Attempt to determine if anyone has been exposed to the radioactive material and the magnitude of the exposure.
6. Maintain complete documentation about the incident as information becomes available.
7. Notify the NRC as required in 10 CFR 20.2201 and 20.2202. Telephone numbers and address of the NRC offices are presented in Appendix D of 10 CFR 20. The NRC can provide the names, telephone numbers, and addresses of radiological control personnel in any state.

#### Procedure Implementation

An independent Radiation Protection Consultant is to arrange for radiation survey personnel to conduct radiation surveys

Subject 4.0 SAMPLING LOCATIONS, FREQUENCIES, AND ANALYSES	ATLAS MINERALS Radiation Safety Procedures Manual	Revision Date	Approval
--	---	------------------	----------

with Atlas personnel. The contract survey personnel will be employed directly by Atlas Minerals to avoid potential conflicts of interest with the demolition contractor who is partially paid by recovering materials and equipment from the mill. The Consultant will train the survey personnel and the demolition contractor personnel on the implementation of this procedure.

#### Record Retention

The radiation survey personnel are to file the Atlas Minerals Equipment Release Survey Form AT-1 in the Radiation Safety Department files.

#### Quality Assurance

1. A Radiation Protection Consultant is to conduct two radiation protection and compliance audits of the implementation of this procedure within the first 3 months of procedure implementation. The reports of those audits will be made available to the NRC within 30 days of the receipt of the audit report by Atlas Minerals. Subsequently Atlas Minerals or their designee will conduct quarterly audits of this procedure for the next year that equipment is being released offsite. Thereafter the audits will be part of the annual ALARA audit.
2. The radiation survey personnel are responsible for conducting the surveys as specified in this procedure, for creation and maintaining the documentation as specified, and for notifying both Atlas Minerals and the Radiation Protection Consultant of any conditions that might lead to the release of radioactive materials in excess of the NRC release limits.
3. The following check list is provided as an aid for implementing this procedure.

Subject 4.0 SAMPLING LOCATIONS, FREQUENCIES, AND ANALYSES	ATLAS MINERALS Radiation Safety Procedures Manual	Revision Date	Approval
--	---	------------------	----------

#### References

1. "Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use or Termination of Licenses for Byproduct or Source Materials,' dated September 1984."
2. USNRC Regulatory Guide 8.30, Health Physics Surveys in Uranium Mills.
3. 10 CFR 20, Standards for Protection Against Radiation.

Subject 4.0 SAMPLING LOCATIONS, FREQUENCIES, AND ANALYSES	ATLAS MINERALS Radiation Safety Procedures Manual	Revision Date	Approval
--	---	------------------	----------

CHECK LIST  
FOR  
SURVEY AND RELEASE OF MATERIALS AND EQUIPMENT  
FROM  
ATLAS MINERALS URANIUM MILL, MOAB, UT

<u>Item</u>	<u>Comments</u>
Location of item	_____
Items qualifies for monitoring	_____
Schedule survey	_____
Scrap dealer identified	_____
Wash item on ore pad	_____
Washed item is dry	_____
Any grease on washed items?	_____
Move item to disassembly area	_____
Separate item to be monitored	_____
Place ID # on equipment	_____
Alpha survey and record	_____
Beta-gamma survey and record	_____
Wipe test	_____
Paint monitoring mark	_____
Turn over, monitor (A,B-G)	_____
Paint monitoring mark	_____
Verify all sides monitored	_____
Count wipe	_____
Compare to NRC standards	_____

Subject 4.0 SAMPLING LOCATIONS, FREQUENCIES, AND ANALYSIS	ATLAS MINERALS Radiation Safety Procedures Manual	Revision Date	Approval
--	---	------------------	----------

- Mark releasable items \_\_\_\_\_
- Move item to eq. trans. yd. or \_\_\_\_\_
- Move item to transport truck \_\_\_\_\_
- Monitor moving equipment \_\_\_\_\_
- Lock gate to eq. trans. yard \_\_\_\_\_
- Monitor truck before loading \_\_\_\_\_
- Visually verify truck load \_\_\_\_\_
- Monitor loaded truck \_\_\_\_\_
- Sign equipment release form \_\_\_\_\_





**ATLAS CORPORATION**  
**(a/k/a ATLAS MINERALS)**

**MOAB MILL**

**IDENTIFICATION  
AND  
RETRIEVAL/DECONTAMINATION  
OF  
CONTAMINATED MATERIAL**

**BACKGROUND**

Atlas Corporation (Atlas) holds Source Material License SUA-917 as issued by the U.S. Nuclear Regulatory Commission (NRC). Atlas has an approved Decommissioning Plan which allows for the dismantling, decontamination and salvage of the Moab Mill. Any material salvaged from the mill must meet the NRC Standards for release for unrestricted use by the public. These standards are set forth in the document entitled, 'Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use or Termination of License for Byproduct of Source Materials' dated September, 1984.

Atlas contracted with American Reclamation and Dismantling Inc. (ARD) for the decommissioning of the Moab Mill in August, 1992. ARD subsequently contracted H&W Enterprises to perform a major portion of the work. In October, 1993 Atlas learned that the owner of H&W Enterprises had been dismissed from the job due to problems arising from insolvency. Shortly thereafter Atlas learned that the owner, Mr. Bob Hopper, alleged that he had "smuggled" contaminated material off the site without the knowledge of Atlas' Radiation Control Coordinator. Due these allegations and the resulting media attention, NRC commenced a special investigation. Also, Atlas voluntarily suspended any release of material from the site. This action was affirmed by the NRC in a "Confirmatory Action Letter" dated November 22, 1993.

In order to provide assurance to the NRC and to the public that any further releases of material from the site would meet NRC's standards, and that any material already released from the site which may have been contaminated would be properly dealt with, Atlas proposed certain revisions to its procedures. The proposed changes are contained in

U.S. NRC  
Retrieval/Decon.  
Moab Mill  
Dec.22,'93  
Page Two

Section 4.4 of Atlas' Radiation Safety Procedures Manual and include a new provision for the retrieval and/or decontamination of materials which may have been released from the Moab Mill. This document addresses the identification and retrieval/decontamination of contaminated materials which may have been released from the site. This document will be updated as information becomes available and will be provided to the NRC on a monthly frequency, provided there is updated information to report.

### **MATERIAL RELEASED**

Approximately 120 truckloads of material have been released and shipped from the Moab Mill. This is approximately 4,500 to 5,000 tons of material, which includes equipment, supplies and scrap steel, stainless steel and copper. Approximately 3,500 tons of the material shipped was scrap steel. The work done to date to decommission the mill is approximately 65% complete.

### **COMPANIES RECEIVING MATERIALS**

Those companies identified as receiving materials from ARD or H&W are shown on Table 1. This information was provided by ARD. Atlas does not have this information due the nature of its agreement with ARD. Atlas relinquished title or ownership to ARD via a Bill of Sale at the restricted area fence line.

### **MATERIALS IDENTIFIED AS CONTAMINATED**

As a result of the investigation commenced by the NRC, several other states initiated their own investigation as well. To date, Atlas is aware that the following materials have been identified by the NRC or a state agency as being contaminated:

<u>MATERIAL</u>	<u>LOCATION</u>
ball mill	Atlas Mine and Mill Supply, Inc. North 1115 Havana St. Spokane, WA
stainless steel parts	Atlas Metal and Iron Corp. 318 Walnut St. Denver, CO

U.S. NRC  
Retrieval/Decon.  
Moab Mill  
Dec.22, '93  
Page Three

MATERIAL

LOCATION

roii crusher

Ute Light  
P.O. Box 387  
Coalville, UT

conveyer belt,  
bag house

Western Clay  
P.O. Box 127  
Aurora, UT

Additional items will be added as they are identified.

NOTIFICATION

All entities listed on Tables 1 and 2 received written notification that materials they received may have been contaminated and they were asked to provide responses to the following questions:

1. How much material did you receive?
2. Type of material received?
3. Type of monitoring conducted?
4. Any problems or concerns with monitoring reports?
5. Any material still on property that can be re-monitored?
6. If material is not on property, what was its disposition?

ARD sent this survey to all identified entities December 1, 1993. Only two written replies were received. They were from California Aggregate Machinery (CAM) and Hiuka America Corporation (Hiuka) (copies enclosed). CAM stated:

"We have not experienced any problems whatsoever and in fact one machine has been sold and shipped to Panama and the other to Toronto, Canada."

CAM received the crushers which were in the crusher building. Contamination on this building was limited to ore dust and washed off readily with water. Hiuka received the bulk of the scrap steel shipped from the site, according to ARD. They responded with the following statement:



U.S. NRC  
Retrieval/Decon.  
Moab Mill  
Dec.22,'93  
Page Four

"For your information, it is the standard practice of Hiuka America Corporation to monitor all scrap materials that are shipped to our facilities, for radioactivity, to standards below the NRC Safety Standards, and it has been found, in all cases of material shipped from that facility [Moab], to our account, that there was no concern about radioactivity, as the material passed through our monitors, without incident."

Additional responses received will be appended hereto.

Also, as indicated on Tables 1 and 2, ARD made verbal contact with many of the entities prompting them to complete the survey and to determine if there were any identified problems. In all cases the response was that there were no problems that they were aware of.

Atlas and ARD will continue to contact those who have not responded to seek additional information. Any additional information concerning contaminated materials will be included herein.

### RETRIEVAL/DECONTAMINATION

Actions taken to date are limited to the return of the stainless steel parts from Atlas Metal and Iron and the coordinating efforts made to decontaminate the ball mill in Washington and the materials identified during the December 16, 1993 meeting with the NRC, by

Scott Hacking of the State of Utah.

The stainless steel was returned in a wooden packing crate and was received at the Moab Mill on December 6, 1993. It was opened on December 9, 1993 in the presence of Carl Dixon and Richard Blubaugh of Atlas and Joe Mitchell of ARD. Each piece was surveyed and the survey was documented. Several of the pieces exceeded the NRC standards. None of the individuals named above could identify any of the material as definitely coming from the Moab Mill. In fact, one piece of rubber-lined pipe was particularly in question since Mr. Mitchell could not recall Atlas using the type of pump associated with the piece of pipe in the product circuit. Mr. Mitchell was Atlas' Maintenance Supervisor for many years.



U.S. NRC  
Retrieval/Decon.  
Moab Mill  
Dec.22,'93  
Page Five

With respect to the ball mill, R. Blubaugh has been in contact with Bob Clark of the State of Washington, who performed the inspection, to determine what requirements must be met for Washington. It appears that a permit/licensing process must be complete prior to dealing with the contamination. This process should be completed in January 1994.

The items found in Utah will be decontaminated as soon as arrangements can be made with the owners and the State of Utah.

TABLE 1

Entities or Individuals Receiving Material  
from Moab, UT

## Atlas Mill Site

	Notification	
	<u>Written</u>	<u>Verbal</u>
ADK Brokerage 1150 N. 530 West Pleasant Grove, UT 84062	X	
Atlas Metal & Iron Corp. 318 Walnut Street Denver, CO 80204	X	X
Atlas Mine & Mill Supply, Inc. North 1115 Havana Street Spokane, WA 99202	X	X
Book Cliff Energy P.O. Box 508 Green River, UT 84525	X	X
California Aggregate Machinery P.O. Box 25446 San Mateo, CA 94402	X	
Castle Valley Academy Castle Valley Star Route Box 1120 Moab, UT 84532	X	
CBA Supply 3758 So. 610 East Salt Lake City, UT 84106	X	
C & R Paint & Glass 1845 So. Hwy. 191 Moab, UT 84532	X	

	Notification	
	<u>Written</u>	<u>Verbal</u>
Excess Distributors, Inc. 918 W. Buchanan Phoenix, AZ 85007	X	
Glens Welding 976 So. Hwy. 191 Moab, UT 84532	X	
Golden Quest Mining NV	X	
Intermountain Steel 380 So. Orange Street Salt Lake City, UT 84104	X	X
J & J Chemical 275 Aspen Moab, UT 84532	X	
Don Kimball NM	X	
K & D Upholstering 1021 Mill Creek Drive Moab, UT 84532	X	
Denny Madigan CA	X	
Moab Ready Mix P.O. Box 569 Moab, UT 84532	X	
Nucor	X	X
Petroleum Processor P.O. Box 1016 American Fork, UT 84003	X	X

	Notification	
	<u>Written</u>	<u>Verbal</u>
Petro Source Refining Partners P.O. Box 27 Salt Lake City, UT 84110	X	
Sagauro Mining LaSal Junction, UT 84530	X	
Slickrock Campground 1301 1/2 N. Hwy. 191 Moab, UT 84532	X	
Thomas Electric Co. 549 West Second South Salt Lake City, UT 84101	X	X
Timber Products P.O. Box 46 LaSal, UT 84530	X	
Utelite P.O. Box 387 Coalville, UT 84017	X	X
Western Clay P.O. Box 127 Aurora, UT 84620	X	X

TABLE 2

American Reclamation & Dismantling  
Scrap Brokers

for

Atlas Mill Site - Moab, UT

<u>Broker</u>	<u>State</u>	<u>Telephone No.</u>	<u>Period</u>
Intermountain Steel	UT	(801) 973-8787	11/92 - 06/93
Nucor	UT	(801) 458-2300	
Intermountain Pipe Plant	UT	(801) 373-6910	
Atlas Metal	CO	(303) 825-7165	06/93 - 07/93
Metro Steel	UT	(801) 328-2051	07/93 - 07/93
Hiuka American	CA	(216) 247-6044	07/93 - 10/93



## AMERICAN

RECLAMATION &amp; DISMANTLING

P.O. BOX 9848

STATELINE, NEVADA 89449

(702) 888-1488

December 01, 1993

Subject: Materials/Equipment Received From Atlas Mineral Mine, Moab, Utah

To Whom It May Concern:

In accordance with a requirement from the Nuclear Regulatory Commission, it is necessary for us to obtain the following information:

1. How much material did you receive:
2. Type of material received:
3. Type of monitoring conducted (Beta or Alpha):
4. Any problems or concerns with monitoring reports:
5. Any material still on property that can be remonitored:
6. If material is not on property, what was its disposition:

We realize that this is an imposition, but it is necessary for us to have this information to address the NRC's concerns. A self-addressed, stamped envelope is enclosed for your convenience. Thank you for your cooperation.

Robert E. Mori

President

RFM:nd

+0114155747271

DENNY MADIGAN

723 P02

DEC 15 '93 20:04

# California Aggregate Machinery



Jaw  
Crusher



Cone  
Crusher



V.S.I.



Impactor



Roller Mill  
Crusher



Gyratory



Conveyors



Screens

December 14, 1993

Mr. Robert Mori - President  
American Reclamation & Dismantling  
P.O.Box 5846  
Stateline, Nevada 89449

Dear Mr. Mori,

This letter is to confirm our conversation regarding the machinery we purchased from you at the Moab, Utah mill site of Atlas Minerals.

We have not experienced any problems what so ever and in fact one machine has been sold and shipped to Panama and the other to Toronto, Canada.

If I can be of any further help please do not hesitate to contact me.

Thank you again for your assistance on the purchase of these machines.

Best regards,

Denny Madigan



DEC-15-'93 16:07 ID:G VARNUM

TEL NO:256 247 2878

#304 P01



HIUKA AMERICA CORPORATION

539 EAST WASHINGTON STREET  
CINCINNATI FALLS, OHIO 44022

TELEPHONE: 216-247-6044

TELEFAX: 216-247-2878

FROM: G.F. VARNUM DATE: DECEMBER 15, 1993

TO: MR. ROBERT MORI

TELEPHONE: \_\_\_\_\_ TELEFAX: 702-588-1798

REFERENCE: POSSIBLE CONTAMINATED SHIPMENTS FROM MOAB, UTAH, TO OUR ACCOUNT

PAGE 1 OF 2

THANK YOU FOR YOUR NOTICE, TODAY, REGARDING THE SUBJECT OF POSSIBLE CONTAMINATED SHIPMENTS FROM MOAB, UTAH.

ALSO, THANK YOU FOR THE NEWS RELEASE FROM ATLAS CORPORATION.

FOR YOUR INFORMATION, IT IS THE STANDARD PRACTICE OF HIUKA AMERICA CORPORATION TO MONITOR ALL SCRAP MATERIALS THAT ARE SHIPPED TO OUR FACILITIES, FOR RADIOACTIVITY, TO STANDARDS BELOW THE NRC SAFETY STANDARDS, AND IT HAS BEEN FOUND, IN ALL CASES OF MATERIAL SHIPPED FROM THAT FACILITY, TO OUR ACCOUNT, THAT THERE WAS NO CONCERN ABOUT RADIOACTIVITY, AS THE MATERIAL PASSED THROUGH OUR MONITORS, WITHOUT INCIDENT.

I APPRECIATE YOUR EXPRESSION OF CONCERN, AND THANK YOU FOR CALLING OUR ATTENTION TO THIS MATTER.

FURTHER, FOR YOUR INFORMATION, I BELIEVE THAT IT IS A COMMON/STANDARD PRACTICE IN OUR INDUSTRY, TO MONITOR ALL RECEIPTS OF MATERIAL TO STANDARDS BELOW NRC REGULATIONS. ALSO, I BELIEVE IT IS THE COMMON PRACTICE OF STEEL MILLS, WHO ULTIMATELY CONSUME OUR SCRAP PRODUCTS, TO MONITOR THEIR INBOUND MATERIALS, SO THERE ARE GENERALLY, SECONDARY AND TERTIARY LEVELS OF MONITORING IN OUR INDUSTRY, IN YOUR INTEREST.

I, TOO, BELIEVE THAT THESE ALLEGATIONS ARE WITHOUT MERIT, HAVING BEEN MADE BY A DISGRUNTLED F--EMPLOYEE/CONTRACTOR. I, PERSONALLY, THINK IT IS A TRAVESTY THAT THIS INCIDENT HAS CAUSED THE INCONVENIENCE TO YOU, AND YOUR ASSOCIATES, THAT IT HAS; IN MY OPINION, OUR NEWS MEDIA, CONSISTANT WITH THEIR PAST PERFORMANCE, HAS "PERSUED ANOTHER POSSIBLE STORY" WITHOUT UNDERTAKING RESPONSIBLE, REQUIRED RESEARCH. THEY SHOULD BE HELD ACCOUNTABLE, ALONG WITH MR. HOPPLER.

BEST REGARDS,