



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV  
URANIUM RECOVERY FIELD OFFICE  
BOX 26326  
DENVER, COLORADO 80226

AUG 14 1990

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Docket No. 8943  
SUA-1534, Amendment No. 4  
04008943150E

MEMORANDUM FOR: Docket File No. 40-8943

FROM: Joel P. Grimm  
Project Manager

SUBJECT: AMENDMENT NO. 4 TO SOURCE MATERIAL LICENSE SUA-1534:  
FERRET, CROW BUTTE CORPORATE ORGANIZATION CHART

On April 25, 1990, Ferret Exploration Company of Nebraska, Inc. (Ferret) submitted a cover letter and enclosures detailing reorganization and promotion of administrative and plant personnel. The submittal was made in accordance with License Condition No. 35. In regard to NRC regulations, Mr. R. Knode was promoted to Vice President, and Ms. R. Grantham was promoted to Corporate Radiation Safety Officer (CRSO).

Discussion

NRC staff review of the submittal indicates that the proposed CRSO has all the qualifications for the position, including education and experience at the facility. CRSO qualifications are itemized in NRC Regulatory Guide 8.31, "Information Relevant to Ensuring that Occupational Radiation Exposures at Uranium Mills will be As Low As Reasonably Achievable." As part of our review, we referred to License Condition No. 18, regarding qualifications of the CRSO and Health Physics Technician (HPT). The license condition is written in precise terms of worker experience with vacuum dryers in the production of yellowcake.

Because Ferret proposes to forego use of dryers, and produce and ship yellowcake slurry, this condition is ambiguous and potentially nonconservative

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in approach. Therefore, in partial response to Ferret's license amendment request, License Condition No. 18 will be revised to require the CRSO's assignment to the site, and specify the HPT's experience requirements, regardless of the installation and use of dryers at the site.

#### Conclusion

The proposed reassignments and reorganization of Ferret are in accordance with NRC regulatory guidance. The NRC staff has reviewed the proposal and found that the new CRSO meets the qualifications for the position. The license will be amended to cite the revised corporate organization and to clarify requirements for the CRSO and HPT at the site. The staff concludes that the changes will result in continued protection of public health and safety and the environment.

License Condition No. 18 is amended to update the personnel requirements at the site. License Condition Nos. 10 and 35 are reworded to refer to the licensee's submittal of April 25, 1990. The April 30, 1990, submittal in License Condition No. 10 was added by Amendment No. 3.

Therefore, pursuant to Title 10, Code of Federal Regulations, Part 40, Source Material License SUA-1534 is amended by revising License Condition Nos. 10, 18, and 35 to read as follows:

10. For use in accordance with statements, descriptions, and representations contained in Sections 3.0, 4.0, 5.0, and 6.0 of the licensee's application submitted by cover letter dated October 7, 1987, as revised by the following:

<u>Submittal Date</u>	<u>Description</u>
December 14, 1987	Enclosed errata sheet and replacement pages for the commercial license application; prepared and submitted by Resource Technologies Group, Inc.
January 22, 1988	Enclosed errata sheet, replacement pages, and replacement figures for the commercial license application.
March 28, 1988	Enclosed errata sheet and replacement pages for the commercial license application.

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May 18, 1988	Enclosed errata sheet, replacement pages, and replacement figures for the commercial license application.
May 23, 1988	Enclosed errata sheet, replacement pages, and engineering design report dated April 27, 1988.
August 3, 1988	Enclosed waste water irrigation proposal dated July 27, 1988.
October 10, 1989	Letter regarding former employees of Ogle Petroleum.
October 26, 1989	Letter regarding former employees of Ogle Petroleum.
January 10, 1990	Cover letter and enclosed tables outlining a radiological and nonradiological environmental monitoring program.
April 10, 1990	Revision of January 10, 1990, submittal.
April 25, 1990	Letter proposing a new Corporate Radiation Safety Officer and Corporate reorganization chart.
April 30, 1990	Cover letter and enclosed site map: proposal to reduce size of restricted area in the R&D/commercial operations interim.

The provisions for preoperational environmental monitoring in the January 10 and April 10, 1990, submittals are in lieu of previous monitoring requirements in the applicant's R&D license, SUA-1441, which was terminated June 12, 1990. Reference to these submittals will be removed upon approval of an operational monitoring program, as specified in a Quality Assurance Program for this license.

Notwithstanding the above, the following conditions shall override any conflicting statements contained in the licensee's application and supplements.



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18. The licensee shall be required to ensure that a Corporate Radiation Safety Officer (CRSO) or an alternate individual meeting the minimum education and experience requirements of a CRSO, shall be assigned full-time to the Crow Butte facility. Documentation of the individuals' training and experience shall be maintained onsite by the licensee. The Health Physics Technician (HPT) shall have four (4) months experience with the CRSO in installation or production operations and a course in respiratory protection, prior to any temporary assignment to the CRSO's duties. In accordance with the recommendations of NRC Regulatory Guide 8.31, the CRSO shall be required to receive biannual refresher training in health physics.
35. Any changes to the organizational chart as illustrated in Figure 5.1-1 of the application dated October 7, 1987, revised by the submittal dated April 25, 1990, shall require approval by the NRC, Uranium Recovery Field Office, in the form of a license amendment.

*Joel P. Grimm*  
Joel P. Grimm  
Project Manager

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