

URANIUM RESOURCES INC.

MARK S. PELIZZA
Environmental Manager

December 8, 1982

Mr. Glen D. Brown, Chief
Technical Program Branch
U. S. Nuclear Regulatory
Commission, Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Re: License SUA-1400
dkn 04008786

Dear Mr. Brown:

Your letter of November 26, 1982, citing several violations which were disclosed at a recent inspection of our project, has been received by this office. The following is Uranium Resources' Inc. (URI) official response.

1. 10CFR 20.103(a)(3) requires that when assessment of a particular individual's intake of radioactive material is necessary, intakes less than those which would result from inhalation for 2 hours in any one day or for 10 hours in any one week at uniform concentrations specified in Appendix B, Table I, Column 1 of 10 CFR 20 need not be included in such assessment, provided that for any assessment in excess of these amounts the entire amount is included.

Contrary to this requirement, assessment of office worker's intake of radon-222 daughters was not performed for periods of office occupancy on March 3, 1982, when airborne concentrations of radon daughters were measured by the licensee to be equivalent to the Appendix B limit.

RESPONSE

- A. The corrective steps which have been taken and the results achieved:

Additional sampling of radon-222 daughters have recently

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been obtained. These results have disclosed daughter levels which were far below the one-third MPC levels. Also, the plant is now in a restoration mode and a source for radon-222 and associated daughters is nonexistent.

B. The corrective steps which will be taken to avoid further violations:

Monthly daughter sampling will be performed in the office area. If daughter levels of greater than one-third the MPC are realized, TWE calculations will be performed for each employee.

C. The date when full compliance will be achieved:

URI is in full compliance at the present time.

2. License Condition 33 requires, in part, that the licensee shall perform monthly surveys for airborne natural uranium and radon or radon progeny in the restricted area as a basis for determining time-weighted exposures for workers.

Contrary to this requirement, surveys for natural uranium were not performed during the first two months of operation (February and March 1982), and surveys for radon or radon progeny were not performed in office areas during April 1982.

RESPONSE

A. The corrective steps which have been taken and the results achieved:

Corrective steps will consist of implementing part B of this response.

B. The corrective steps which will be taken to avoid further violations:

Monthly surveys for natural uranium will be completed monthly for the duration of the project. Also, as stated in response # 1, monthly radon daughter measurements will be obtained from within the office.

C. The date when full compliance will be achieved:

URI is in compliance with this violation at the present time.

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3. License Condition 10 requires, in part, that licensed material be used in accordance with statements, representations, and conditions contained in the Technical Report supplement dated October 21, 1981. Section E-E-3 of the supplement states that alpha contamination in excess of 1000 dpm/100cm² will be cause for decontamination and a documented investigation by the radiation safety staff.

Contrary to this requirement, since the beginning of operations during February 1982, such data were not converted from units of counts per minute in order to enable comparison with the action limit. Also, survey results mathematically determined to be in excess of the action limit by the inspector had not resulted in a documented investigation by the radiation safety staff.

RESPONSE

- A. The corrective steps which have been taken and the results achieved:

URI will convert all alpha measurements from counts per minute to dpm and correct for the surface area of the alpha probe. Any survey results which exceed 1000 dpm/100cm² will be investigated by the radiation safety staff.

- B. The corrective steps which will be taken to avoid further violations:

URI will automatically convert all alpha measurements from counts per minute to dpm at the time the measurement is made. Furthermore, all measurements will be recorded in dpm.

- C. The date when full compliance will be achieved:

URI is in complete compliance with this citation at this time.

4. License Condition 31 requires, in part, that written procedures shall be reviewed and approved in writing by the Radiation Safety Officer or other expert with equivalent qualifications.

Contrary to this requirement, such approval had not been documented for procedures in use at the licensee's facility on October 7, 1982.

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RESPONSE

- A. The corrective steps which have been taken and the results achieved:

An approved version of the Procedure Manual was mailed after Mr. Cain notified URI of the violation at the time of inspection.

- B. The corrective steps which will be taken to avoid further violations:

All changes in the Procedure Manual will be approved in writing by the RSO.

- C. The date when full compliance will be achieved:

URI is in full compliance at this time.

5. License Condition 35 requires, in part, that a report of each semiannual ALARA audit shall be submitted to the NRC.

Contrary to this requirement, such a report has not been submitted since the project commenced operation on February 8, 1982.

RESPONSE

- A. The corrective steps which have been taken and the results achieved:

A copy of the audit which was conducted in July of 1981 has been submitted.

- B. The corrective steps which will be taken to avoid further violations:

Copies of future audits will be submitted in a more timely manner.

- C. The date when full compliance will be achieved:

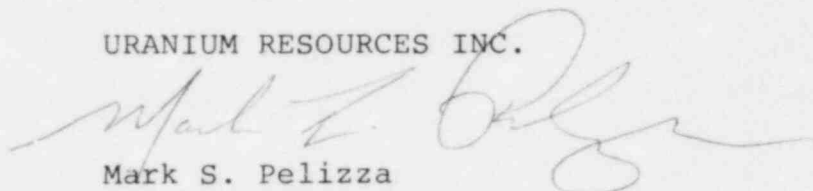
URI is in full compliance at this time.

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If you have further questions pertaining to this response,
please contact the undersigned.

Sincerely,

URANIUM RESOURCES INC.

A handwritten signature in cursive script, appearing to read "Mark S. Pelizza", written in dark ink.

Mark S. Pelizza
Environmental Manager

MSP/jmw

cc: Sheryl McArt
North Platte Project