

AUG 17 1982

Docket File 40-8681  
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WMUR:DMG  
Docket No. 40-8681

MEMORANDUM FOR: Docket File No. 40-8681  
FROM: Daniel M. Gillen, Project Manager  
New Facilities Section, WMUR  
SUBJECT: REVIEW OF MILL APPRAISAL; ENERGY FUELS NUCLEAR  
(EFN), WHITE MESA MILL

The mill appraisal report for the White Mesa Mill (IE Report 40-8681/81-02) identified two significant weaknesses in the mill health and safety program as follows:

1. Comprehensive written procedures were not established for respiratory protection and environmental monitoring.
2. The internal exposure control program was not acceptable because of the following:
  - a. Turnaround time between airborne uranium sample collection and reporting of data (2-4 weeks) was too long.
  - b. Uranium plus radon air sample data was not being compared to the quarterly control limits.
  - c. The respiratory protection program did not include medical evaluations of personnel, radiological survey of respirators, or an evaluation of supplied air quality against the requirements of Grade "D" air as referenced in ANSI-2288.2-1969.

It was further identified that the licensee's documentation of the tailings retention system inspections was inadequate. The inspection forms used by the licensee were found to be lacking in the detail necessary to record adequate inspection data. In addition, monthly and quarterly inspections that should include inspections of diversion ditches and surveys of embankment slopes and crests were not documented. In response to these findings, EFN has recently submitted a comprehensive tailings system monitoring plan. The report is currently under review,

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and based on results of the review it is likely that licensing action to set requirements for a detailed inspection program will be initiated.

In addition, the appraisal identified that contrary to the requirements of License Condition No. 38, two of the three stacks from the sampling plant and the stack from the grinding mill had not been sampled from May 1980 to November 1981. This omission was previously identified by the staff's review of EFN's semi-annual monitoring data, and the stack monitoring program has been corrected.

These issues were presented to Energy Fuels Nuclear by I&E letter dated February 2, 1982, to which was attached the detailed mill appraisal report. EFN described their responses to remedy the weaknesses and violation in a letter dated February 25, 1982. By a March 16, 1982 letter the NRC I&E Region IV staff requested additional information which EFN submitted by letter dated March 24, 1982. The remedial actions have been identified in the Region IV response dated April 8, 1982 as being sufficient to correct the deficiencies presented in the appraisal report. Recent environmental monitoring data reports submitted in accordance with 40CFR190 have included the required stack monitoring data. No licensing action other than that described above for the tailings inspection program will be required as a result of the appraisal.

Original Signed by  
D. M. Gillen

Daniel M. Gillen, Project Manager  
New Facilities Section  
Uranium Recovery Licensing Branch  
Division of Waste Management

Approved By:

Original Signed by  
D. M. Gillen

Dan E. Martin, Section Leader  
New Facilities Section  
Uranium Recovery Licensing Branch  
Division of Waste Management

Case Closed: 04008681130E

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