

Mr. Charles A. Judd
 Executive Vice President
 Envirocare of Utah, Inc.
 American Towers Commercial
 46 W. Broadway, Suite 240
 Salt Lake City, Utah 84101

MAR 28 1994

Dear Mr. Judd:

On January 14, 1994, Envirocare of Utah, Inc., (Envirocare) submitted, for U.S. Nuclear Regulatory Commission review and approval, the following document in response to a condition 9.6(d) in byproduct material license No. SMC-1559:

"Program for Maintaining Radiation Exposure As Low As Reasonably Achievable (ALARA)," revised January 1994, and General Training Requirements, dated January 14, 1994, in accordance with License Condition 9.6 (d)."

The NRC staff has completed its review of this document and approves the licensee's ALARA program. Envirocare, therefore, has fulfilled the requirements of license condition 9.6(d). The basis for NRC's approval is documented in the enclosed safety evaluation.

Should you have any questions, please contact the NRC Project Manager, Sandra L. Wastler at (301) 504-2582.

Sincerely,

ORIGINAL SIGNED BY

Joseph J. Holonich, Acting Chief
 Uranium Recovery Branch
 Division of Low-Level Waste Management
 and Decommissioning
 Office of Nuclear Material Safety
 and Safeguards

Enclosure: As stated

cc: D. Hiller

W. Sinclair, Utah

Docket Number: 40-8989

License Number: SMC-1559

Distribution: See attached list

SUBJECT ABSTRACT: NRC'S APPROVAL OF ENVIROCARE'S ALARA

OFC	LLUR		LLUR	LLUR		
NAME	SWastler		MFliege1	JHolonich		
DATE	03/24/94		03/21/94	03/12/94		

S:\LLWMTYPE\JOAN\L96D.SLW and SE 96(d).slw OFFICIAL RECORD COPY

In small Box on "DATE:" line enter: M = E-Mail Distribution Copy H = Hard Copy

PDR : YES NO Category: Proprietary or CF Only

ACNW: YES NO Delete file after distribution Yes No

IG: YES NO

NL17

9403310245 940328
 PDR ADOCK 04008989
 C PDR

NRC FILE CENTER COPY

BCC list for letter dated: _____

MAR 28 1994

Paul J. Merges, Ph.D
New York Department of
Environmental Conservation
50 Wolf Road
Albany, NY 12233

Maxine Dunkleman
Washington Department of Health
Division of Radiation Protection
P.O. Box 47827
Olympia, WA 98504-7827

Mr. Bill Seay
Formerly Utilized Sites Remedial
Action Program
U.S. Department of Energy
Oak Ridge Operations Office
P.O. Box 2001
Oak Ridge, TN 37831-8723

Distribution: (For Envirocare Letter dated: MAR 28 1994)

Central File#

NMSS r/f

LLWM r/f

PDR

ACNW

HThompson

RBernero

GArlotto

JGreeves

PLohaus

JHolonich

MBell

JSurmeier

JAustin

MFliegel

DGillen

SWastler

AMullins

DRom

LHamdan

TJohnson

EBrummett

CMcKinney

CPittiglio

LBykoski

LGerke,OCA

MCallahan,OCA

RFonner,OGC

STurk,OGC

TCombs,OSP

KStablein,EDO

PGarcia,RIV,URFO

RHall,RIV,URFO

CHackney,RIV,SLO

JGilliland,RIV,PAO

RDoda,RIV,SAPU

BSpitzberg,RIV

SAFETY EVALUATION
OF
"PROGRAM FOR MAINTAINING RADIATION EXPOSURE AS LOW AS REASONABLE ACHEIVABLE"
REVISED JANUARY 21, 1994, AND
GENERAL TRAINING REQUIREMENTS DATED JANUARY 14,1994
by
ENVIROCARE OF UTAH, INC

BACKGROUND

License Condition 9.6(d) of License No. SMC-1559 issued to Envirocare of Utah, Inc. (Envirocare) on November 19, 1993 states:

"Prior to the initial receipt and storage of any 11e.(2) byproduct material at the site, the licensee shall:

submit and obtain NRC [U.S. Nuclear Regulatory Commission] approval of the detailed description of the as-low-as-reasonably-achievable (ALARA) program. The description shall address the detailed procedures for significant elements of the ALARA program, specifically ALARA philosophy and goals, responsibilities for overseeing and revising the ALARA program, ALARA program audit functions, respiratory protection, effluent controls, facility equipment design, ALARA training, and fire control."

On November 24, 1993, Envirocare of Utah, Inc., (Envirocare) originally submitted its program for NRC review and approval. The NRC staff reviewed the document and requested additional information in a letter dated February 1, 1994, but an informal request had been forwarded earlier. On January 14, 1994, Envirocare of Utah, Inc., (Envirocare) submitted its revised ALARA program for review and approval.

NRC STAFF REVIEW

The ALARA program was reviewed for acceptability to all applicable regulations and standards. These included 10 CFR Part 20, License Condition 9.6(d), and the following NRC Regulatory Guides (Reg Guide) on acceptable ALARA programs:

Reg Guide 8.10, "Operating Philosophy for Maintaining Occupational Radiation Exposure As Low As Reasonably Achievable;"

Reg Guide 8.31, "Information Relevant to Ensuring that Occupational Radiation Exposures at Uranium Mills will be As Low As Reasonably Achievable;" and

Reg Guide 8.27, "ALARA Levels for Effluent from Materials Facilities."

Envirocare's ALARA policy statement indicates the responsibilities of the personnel at Envirocare, from the Vice President of Operations, who has ultimate responsibility, to all Envirocare personnel, who must be cognizant of ALARA

practices and goals. The policy statement provides an avenue for ALARA concerns to be raised to all levels of management for resolution.

The Radiation Safety Committee (RSC) will develop ALARA goals and objectives for each year (or, additionally, for each project), review annual ALARA audits and assure that management plans and operating procedures integrate ALARA goals and objectives. The initial goals, until revised by the RSC, are as follows:

1. Employee doses are below 10% of the total effective dose equivalent (TEDE) limit of 0.05 Sv (5 rem) per year;
2. Off-site public doses are to be limited to 10% of the limit of 1 mSv (100 mrem); and
3. Project ALARA goals may be developed for large projects.

In addition to ALARA goals and objectives, RSC will revise and approve investigation levels, as necessary. Initial investigation levels are as follows:

1. Monthly personnel radiation exposures in excess of 0.5 mSv (50 mrem) TEDE;
2. Measured airborne radionuclide concentrations in the work area or at the site perimeter in excess of 25 percent of the appropriate derived air concentration for the measurement period;
3. Trend analysis indications of potential exceedance of conditions 1 or 2.

Envirocare has integrated the ALARA philosophy into many of its operating and administrative procedures. Envirocare will use standard operating procedures and radiation work permits to specify methods to assure safe operations. Envirocare considers the control of airborne radioactivity essential to the ALARA program. Use of specific measures such as application of water and chemical surfactant to dusty areas will help to assure that releases are ALARA. Audits of the ALARA program will be done at least annually by personnel that do not have day-to-day responsibilities in implementation of the the radiation safety program, with the Corporate Radiation Safety Officer having lead responsibility.

One of the Field Radiation Safety Officer's responsibilities is training of all personnel visiting or working at the site. Personnel will receive a radiation safety course covering the radiological hazards present at the Clive site and the importance of the ALARA program. Personnel will receive refresher training, at least, annually.

The ALARA policy and program provides reasonable assurance to NRC that both occupational and public exposures will be maintained ALARA. The procedures, responsibilities, training, and management, described in the submittal, acceptably meet the requirements for an ALARA program.

CONCLUSION

As a result of the above evaluation, NRC staff has concluded that the ALARA program as described in Envirocare of Utah, Inc's "Program for Maintaining Radiation Exposure As Low As Reasonable Achievable" revised January 21, 1994, and General Training Requirements dated January 14, 1994 comply with applicable regulations and standards. Therefore, the licensee's plan is approved and the requirements of license condition 9.6(d) have been met.