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APPENDIX B

U. S. NUCLEAR REGULATORY COMMISSION

REGION IV

URANIUM RECOVERY FIELD OFFICE

NRC Inspection Report: 40-8681/90-02

License: SUA-1358

Doc'et: 40-8681

Licensee: Umetco Minerals Corporation
P. O. Box 669
Blanding, Utah 84511

Facility: White Mesa Mill

Inspection At: San Juan County, Utah

Inspection Conducted: August 13-16, 1990

Inspectors:

/s/
Pete J. Garcia, Jr., Project Manager
Team Leader

9-7-90
Date

/s/
Dana C. Ward, Project Manager

9-10-90
Date

/s/
Paul W. Michaud, Project Manager

9-10-90
Date

Approved by:

/s/
Lawrence A. Yandell, Acting Director
Uranium Recovery Field Office
Region IV

9/11/90
Date

Inspection Summary

Inspection Conducted August 13-16, 1990 (Report 40-8681/90-02)

Areas Inspected: Routine, unannounced inspection of uranium milling operations and radiation safety program including: Management Organization and Controls/Operations Review, Operator Training and Refining, Maintenance and Surveillance Testing, Radiation Protection, Radioactive Waste Management, Transportation of Radioactive Materials, Environmental Protection, and Emergency Preparedness.

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The inspection involved a total of 53 inspector hours on site by three inspectors.

Results: Within the nine areas inspected, three violations were identified in two areas:

1. Failure to utilize airborne concentrations of radioactive materials in the dryer enclosure to determine exposures for a yellowcake precipitation operator.
2. Failure to maintain adequate issuance records for respirator use.
3. Failure to suspend yellowcake drying operations when the emission control equipment was not operating within specifications for optimum performance.

The inspectors concluded that the licensee is implementing adequate programs for radiation safety and environmental protection. In addition, licensee management has shown an aggressive attitude in implementing improvements to the programs and responding to inspector-identified weaknesses. No areas of concern were noted.

Details1. Persons Contacted

- *D. Sparling, Plant Manager
- *G. Ray, Production Superintendent
- *S. Schieman, Radiation Protection Officer
- *W. Brice, Maintenance Superintendent
- *J. Hamrick, Site Environmental Coordinator
- *G. Swanson, Engineer
- *C. Thomas, Safety Coordinator
- *C. Myers, Safety Engineer
- *S. Clark, Environmental Technician
- G. Jones, Radiation Technologist
- H. Palmer, Radiation Technologist

*Denotes those present at exit interview.

The inspectors interviewed several mill employees during the course of the inspection.

2. Licensee Action on Previous Inspection Findings

(Closed) Violation (40-8681/89-002-01) One individual was observed not wearing a respirator in a designated airborne area. The inspectors noted that all personnel were wearing respirators in designated airborne areas. The inspectors were also informed by the Radiation Protection Officer that the individual observed during last year's inspection not wearing a respirator was counseled by management.

(Closed) violation (40-8681/89-002-02) Failure to submit to the NRC the annual update to the surety cost estimate. The inspectors noted that the annual cost estimate update had been submitted.

(Closed) Violation (40-8681/89-002-03) Failure of the Radiation Protection Officer (RPO) to attend refresher training on uranium mill health physics every two years. The inspectors noted that the RPO had attended radiation safety training during October 1989.

(Closed) Violation (40-8681/89-002-04) Failure of the RPO to review the Standard Operating Procedure (SOP) for control of blowing tailings. The inspectors noted that all SOPs had been reviewed since the last inspection, including the SOP for control of blowing tailings.

(Closed) Open Items (40-8681/86-01), (40-8681/87-01), (40-8681/88-001) The open items discussed during the previous four inspections concerned the inspection of diversion ditches 1, 2, and 3. The inspectors noted that all three diversion ditches have been constructed and are being inspected.

(Closed) Open Item (40-8681/89-002-05) Failure of the licensee to characterize an existing well within 2 kilometers of the tailings disposal area. The inspectors noted that the well in question is 3.25 kilometers outside the disposal area and in an upgradient direction from the tailings cells. No further characterization is therefore considered necessary.

(Open) Open Item (40-8681/89-002-06) The separate emergency response procedure should be incorporated with the existing procedure manual and be reviewed annually by the RPO. The inspectors noted that the separate emergency response manual had not been incorporated with the procedure manual.

3. Management, Organization and Controls/Operations Reviews

At the time of the inspection, the mill was in an operating status producing both yellowcake and vanadium. Production of yellowcake during calendar year 1989 was 3,743,475 pounds. The production rate was noted to be within the limits specified in the license. At the time of the inspection there were 146 full-time personnel and 11 temporary personnel employed at the facility. The staff operates in shifts 24 hours a day, 7 days a week.

The licensee described the organizational structure of the mill and staff. The Plant Manager is the highest level of corporate management onsite. The Plant Manager reports directly to the Umetco Operations Manager located in Grand Junction, Colorado. The Radiation Protection Officer (RPO) reports directly to the Mill Manager and also has access to the Umetco Operations Manager. Two Radiation Technologists report to the RPO and conduct the routine operations of the radiation protection program. The Safety Coordinator and Environmental Engineer also report directly to the Mill Manager. Each position has supporting staff.

The inspectors reviewed records pertaining to mill inspections and noted that the radiation protection staff had performed daily and weekly inspections as required by the license. The inspections were summarized in monthly reports to the Mill Manager. The reports also contained all radiation monitoring and exposure data.

Standard Operating Procedures (SOPs) were reviewed by the inspectors. The SOPs for the operations were complete and provided sufficient detail to describe completely the routine jobs. A copy of each procedure explaining the job to be performed was found to be in-place at each work station. All procedures had been reviewed by the RPO since the last inspection. The inspectors noted that the procedure manuals were cumbersome and could be improved by including a comprehensive index and more tabs to help locate specific procedures.

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The inspectors reviewed the Radiation Work Permits (RWP) issued since the previous inspection by the radiation protection staff. The inspectors determined that the RWPs were properly utilized, except for one instance which will be covered in Section 6d, and contained sufficient information to define the radiation safety aspects of the work to be performed. It was noted by the inspectors that all RWP jobs conducted in the yellowcake dryer and packaging enclosures are continuously monitored by the radiation protection staff.

The inspectors noted that tracking of air sampling data was tedious because there is currently no method for quickly referencing the specific data corresponding to a particular RWP. The inspectors recommended that the licensee consider developing a method of tracking the concentration data from the RWPs through the exposure concentration data sheets. One method discussed could be done simply by using the existing RWP issuance number to track the corresponding results.

No violations or deviations were identified by the inspectors.

4. Training and Retraining

Records of the radiation safety training were reviewed by the inspectors. All employees are given a minimum of one hour of refresher training annually. New employees were given introductory radiation training that lasted a minimum of six hours, with an additional twenty hours of safety and first aid training. Examinations were required after training sessions with 70 percent considered a passing grade. Retraining is given to those individuals that score less than 70 percent.

Visitors and contractors were provided specialized training directed at those areas specific to the task to be performed. Hazard recognition training was emphasized for persons going on site for short durations. Materials covered during training were reviewed and found to be in accordance with recommendations contained in Regulatory Guide 8.31. Records of employee training and written tests were found to be adequate.

Female employees and female visitors to the mill area were given instruction regarding prenatal radiation exposure. Female employees were also required to sign a statement that they had received this instruction. The RPO as a precaution will have the TLD changed monthly for any expectant women working onsite if he is informed of the pregnancy. The inspectors noted that documentation of instruction to the female workers was adequate and conformed to Regulatory Guide 8.13.

Safety meetings were conducted monthly and normally last an hour. Safety training was most often conducted by the Safety Coordinator and his assistant. A wide range of topics were recently presented that covered such diverse areas as hazards in the mill, first aid, fall protection, on the job safety, and off the job safety.

No violations or deviations were identified by the inspectors.

5. Maintenance and Surveillance Testing

The inspectors conducted several walk-throughs of the mill and grounds during the inspection. The mill and all ancillary structures appeared to be in good condition. All entrances to the mill were posted in accordance with License Condition No. 27. The inspectors also noted that employee notices required by 10 CFR 19.11 were conspicuously posted.

Mill access is controlled by a chain link fence with one main entry gate for mill workers. The inspectors noted a guard house at the entry gate but no guards were observed. The gate is normally open during shift changes and closed at all other times. The inspectors noted that a portion of the restricted area fence which crosses a gravel road into the restricted area adjacent to the facility parking lot was in need of repair. Recent erosion had weakened the placement of several posts. In addition, additional posting on that section of the fence is needed. The need to repair and post the fence was identified as an open item (40-8681/9002-04).

The inspectors observed that maintenance activities are mainly corrective and that the licensee has no preventative maintenance program. Calibrations are performed on an as-needed basis based on operational verifications. The inspectors observed automatic controllers in operation on the feed flow to solvent extraction (SX), organic flow to SX, and neutralizing ammonia flow. The operation of each of these controllers is routinely checked against other flow indications such as the clarifier overflow and vanadium feed flow to detect any imbalance.

The inspectors observed a functional test of the yellowcake dryer automatic temperature controller and high temperature alarm. The inspectors also observed tests of the auto-start of sump pumps in the counter-current decantation, SX, and yellowcake areas. Alarm and light checks were observed at each control panel in the mill.

The inspectors reviewed the documentation regarding water flow and air pressure checks for emission control equipment performed during operational periods. The licensee is required to cease operations in the affected area if emission control equipment is not maintained within the manufacturer's specifications. Contrary to this requirement, yellowcake packaging operations were conducted during the period August 5-15, 1990, while water flow for the scrubber was outside the manufacturer's

recommended ranges. The failure to suspend operations when water flows were outside recommended ranges was identified as an apparent violation of License Condition No. 34A (40-8681/9002-01).

One apparent violation was identified by the inspectors.

6. Radiation Protection

a. Internal Exposure Control

The inspectors reviewed the licensee's program for control of internal exposure. Five locations were sampled weekly and 26 locations were sampled monthly. The samples were collected for 60 minutes at a flowrate of 40 liters per minutes and analyzed fluorometrically. Annual samples are also collected for 8 hours at 26 locations and analyzed fluorometrically. The sample pumps were calibrated prior to use either by a Kurz flow meter or bubble tube.

Lapel breathing zone samples were collected for one 8-hour shift per week for employees who routinely work within the yellowcake packaging and precipitation operations. Breathing zone sampler were also collected for the duration of all RWP jobs within the yellowcake precipitation area. The samples were collected at a flow rate of 2 liters per minutes and analyzed fluorometrically. The sample pumps were calibrated prior to use using a bubble tube.

Radon daughter samples were collected weekly at 10 locations and monthly at 26 locations. The samples were taken for 5 minutes at a flow rate of 2 liters per minute using lapel air samplers. Filters were analyzed using the modified Kusnetz method.

A review of air sampling data indicated that only the yellowcake drying and packaging enclosures routinely exceeded 25 percent of MPC for uranium, and only the top floor of the SAG mill exceeded 25 percent of MPC for radon daughters. These areas were noted to be posted as "Airborne Radioactivity Areas" in accordance with 10 CFR 20.203(d)(2).

b. Internal Exposure Determination

Internal exposures to airborne uranium were determined using the results of the breathing zone and area air samples with the occupancy time in a sampled area. All mill workers complete weekly time cards indicating the time spent in the various mill areas. Occupancy and concentration data were input weekly into a computer program. Records of time spent in nonroutine maintenance work is kept on the RWP issued for the job. The occupancy times and airborne concentrations were then used by a member of the radiation safety staff to manually calculate the exposure for the job. The calculated

exposure was then input into the computer to provide a total exposure for the week. The inspectors noted some minor calculation errors in the manual calculations, and suggested additional review of the calculations. The inspector's review of the exposure data indicated that no employee exceeded the 40-hour exposure limit for soluble uranium or the 40-hour control measure for ore dust.

A review of the data also indicated that the airborne concentrations in the yellowcake dryer enclosure were not used to calculate the internal exposure for a yellowcake precipitation operator whose job required routine entry into the packaging enclosure during the period June 3 through July 28, 1990. This oversight occurred because the operator failed to list time spent in the enclosure on his weekly time card. The failure to utilize the concentrations in the enclosure was identified as an apparent violation of 10 CFR 20.103(a)(3) [40-8681/9002-02].

c. External Exposure Control

The inspectors reviewed the licensee's program for control of external exposure. Instrument surveys of external radiation levels were conducted monthly in approximately 70 locations. The survey instruments were calibrated semiannually. A review of the survey data indicated that levels were routinely below 2 mR/hour except for the yellowcake storage area. The yellowcake storage area was noted to be posted as a "Radiation Area" as specified in 10 CFR 20.203(b).

It was also determined as a result of surveys conducted in July 1990 that the mix tanks on the solvent extraction circuit were reading 8 to 10 mR/hr on contact. A memorandum was issued on August 7, 1990, to the Plant Manager concerning the elevated exposure potential and action to be taken. Copies of the memorandum were distributed to all supervisors and posted on employee bulletin boards. Signs which could be attached directly to the tanks to designate the tanks as "Radiation Areas" were ordered on July 26, 1990. The signs were received and placed on the tanks by the RPO during the course of the inspection.

Personnel exposures to external radiation were determined by the use of thermoluminescent dosimeters (TLDs). The TLDs were provided to the 146 personnel that work within the restricted area. The TLDs were kept in the guard quarters at the main gate to the mill and were exchanged quarterly. A review of the data indicated that most exposures did not exceed 100 mRem/quarter. One worker had an exposure of 235 mRem whole body during the 4th quarter of 1989 and another worker had a whole body dose of 736 mRem during the 1st quarter of 1990. The RPO believes that the 736 mRem exposure is in error but the reason for this unusually high reading had not been determined.

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Area dosimeters have been placed at 17 locations throughout the mill and ore stockpile area. These TLDs are exchanged quarterly and the data is reduced to 13 weekly readings. The highest weekly average obtained was for the 2nd quarter of 1990 at 32.95 mRem. This reading was obtained at the ore buying station.

Radiation survey instrumentation was checked by the inspectors during the inspection. All instruments were in calibration and all instruments are calibrated offsite by a vendor. The vendor does a one point calibration scale. The inspectors noted to the licensee that Regulatory Guide 8.30 recommends that calibration be done on two points of each scale.

d. Respiratory Protection

The licensee maintains a respiratory protection program which includes the use of full-face and half-mask respirators. Full-face respirators were required for all work in the yellowcake drying and packaging enclosures. Half-mask respirators are required for all work on the top floor of the SAG mill area. Credit for the use of respiratory protection equipment is taken in calculating exposures for yellowcake precipitation and packaging operators and employees involved in certain RWP jobs.

Issuance records for required respirator use were generally maintained. However, issuance records were not maintained for yellowcake precipitation operations on April 1, 2, 4, 6, 7, 1990; June 24-26, 1990; and July 1-5, 1990; and RWP 795, issued on June 7, 1990, for which respiratory protection credit was used in determining employee exposures. The failure to maintain issuance records for specific dates for which protection credit was used was identified as an apparent violation of 10 CFR 20.103(c)(2) [40-8681/9002-03].

Employee training on respirators was reviewed and found to be in compliance with Regulatory Guide 8.15. Fit testing is conducted annually by the RPO and prior to use with a newly issued respirator by a trained co-worker. Irritant smoke is used for fit testing. The inspectors reviewed the medical evaluations performed on all employees for which respirators were issued. It was noted that about 10 percent of the employees had not received their annual medical evaluations. Some employees were several weeks late, although none

regularly eat. The licensee has established an action level of 100 dpm removable alpha/100 cm² for decontamination of nonproduction areas. This is 10 percent of the action level of 1000 dpm/100 cm² specified by the license. A review of the survey data indicates that results were well under the action level.

Contamination of personnel within the restricted area is controlled through the use of protective clothing, showering, and surveys. All visitors and workers monitor themselves or are monitored by trained employees prior to exiting the site. The survey instruments had been checked for proper operation each day. The licensee had conducted and documented quarterly spot checks of personnel leaving the mill since the last inspection.

f. Bioassay

The mill's bioassay program consists of biweekly collection and analysis of urine samples for all yellowcake operators and monthly collection for all other mill workers. Samples are also collected for each RWP and at termination of employment. Workers normally take samples at home and drop them off at designated collection points where they are retrieved by the radiation protection staff. Samples are analyzed in-house with 10 percent of the samples shipped to a vendor laboratory as a quality control check. Each sample collected is split and 25 percent of the split samples are spiked at increments between 10 and 75 ug/l as a quality control check. The quality control check continued to indicate that the in-house results were accurate.

The inspectors interviewed the Chief Chemist during the inspection and he reviewed the procedure used to analyze urine samples in the laboratory. The Chief Chemist demonstrated each step taken to analyze a sample and the calculations used to obtain a numerical result. The laboratory used for urinalysis appeared to be well organized and clean. Removable alpha contamination surveys were performed regularly in this part of the laboratory.

The review of urinalysis data indicates that results were generally below the initial action level of 15 ug/l uranium. Results above 15 ug/l were investigated and the individual retested. One individual reached the second action level of 35 ug/l. The worker was removed from work involving potential exposure to airborne radioactive materials until his urinalysis results were below the action levels. No areas of concern were noted.

Two apparent violations were identified by the inspectors.

7. Radioactive Waste Management

The tailings management system at the White Mesa Mill consists of a series of synthetically lined cells. Cells 1-I and 4A contain process solutions.

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Cell 2 is approaching final elevations, and is currently not receiving additional tailings. Approximately 35 percent of Cell 2 is covered with a soil layer and the remainder of the tailings surface is still wet. Tailings are currently discharged into Cell 3. The discharge point is moved to keep all areas of the cell wetted.

The inspectors reviewed records of the licensee's dam inspection program. Daily visual inspections of all cells were conducted by the Plant Engineer. Weekly pond water level measurements were made. On a monthly frequency, measurements of the thickness of process piping were made and surface water control structures evaluated. A detailed quarterly inspection of the cells was also performed by the site Environmental Coordinator. The review of records indicated no areas of concern.

The inspector accompanied the Plant Engineer on a routine daily inspection to observe inspection techniques. The inspector observed during the tour of the tailings cells that an erosion gully had formed on an outslope of a Cell 4A dike. The inspector noted that the gully was over one foot in depth and that the gully had progressed into the dike crest. The inspector recommended that corrective actions be taken to repair the gully erosion.

The inspectors also reviewed records concerning the construction of Cell 4A. The construction was performed between May and November 1989. The records included field density and moisture tests, gradation tests, Atterberg Limits tests, and Standard Proctor laboratory density tests. The inspectors determined that required frequencies for quality control tests had been exceeded, and that areas not meeting design specifications had been recompacted and retested. Records of retests were reviewed and no discrepancies noted.

The inspectors also reviewed records regarding placement of the high density polyethylene liner. The licensee performed non-destructive vacuum box testing as well as shear strength testing on all seams. The record review indicated a high number of questionable test results during the installation of the first third of the liner. Discussion with licensee representatives indicated the problem was attributable to the onsite supervisor for the liner installation contractor. The supervisor's priority was clearly quick installation of the liner rather than assuring good quality on the seams. The licensee brought the problem to the attention of the contractor, resulting in the assignment of a new supervisor to the project. Future installation of the liner proceeded in a satisfactory manner. The review of records indicated that early problems were corrected and the liner adequately installed.

No violations or deviations were identified by the inspectors.

8. Transportation of Radioactive Materials

The inspectors reviewed the records of contamination surveys performed on yellowcake drums. Each drum was surveyed for removable contamination prior to loading. Records indicated that no drum exceeded 100 dpm, which is below the limit specified in Source Material License SUA-1358. The licensee also surveyed the trailer and driver's seat. These surveys indicated levels well below the allowable limit. The licensee's records of product surveys and shipments were complete and in accordance with license requirements.

The licensee indicated that yellowcake drums are recycled and that drums are repainted prior to use. The inspectors recommended that to prevent possible contamination from being painted over that 10 percent of the recycled drums be surveyed prior to reuse.

From February 1990 through April 1990, a total of 81 shipments of LSA material was made from the ARCO Bluewater Mill in Grants, NM to the White Mesa Mill. Each shipment was made in an exclusive use vehicle accompanied by shipping manifest. All equipment was alpha and gamma surveyed prior to transport.

No violations or deviations were identified by the inspectors.

9. Environmental Protection

The NRC inspectors toured the mill property and visited three of the environmental monitoring stations: BHV-1, BHV-4 and BHV-5. The monitoring stations appeared to be in good working condition. Each site had a high volume particulate air sampler, passive radon monitor, and environmental TLD. Site BHV-1 also had a recording weather station for wind speed and wind direction.

Filters from the high volume particulate samplers were exchanged weekly and composited quarterly for analysis. Samplers were calibrated monthly or at motor change-outs. A critical orifice assembly was used to calibrate air flow on each monitor and the orifice was calibrated by EPA Region 8 semi-annually. The licensee had two orifices and one is in calibration at all times.

Surface water samples were normally collected from two locations, Cottonwood and West Water Creeks, and analyzed for U-nat, Ra-226 and Th-230. Ground water wells are sampled semiannually for TDS, chlorides, sulfates, sodium, selenium, arsenic, Ra-226, Th-230, Pb-210 and U-nat. Wells were noted to be in good repair.

Soil and vegetation samples are collected at select sites and frequencies as defined by requirements. Continuous radon and direct radiation monitoring were also collected at all environmental sampling stations.

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License Condition No. 15 requires the licensee to avoid by design archeological sites designated as "contributing" on the site survey and where such avoidance is infeasible conduct an excavation. The inspectors reviewed records maintained by the Environmental Engineer and determined that no sites located by surveys were impacted by recent expansion of Cell 4A. It was also determined that no sites would be harmed by construction of Cell 4B.

No violations or deviations were identified by the inspectors.

10. Emergency Preparedness

There were approximately 170 fire extinguishers placed throughout the site with two 150 pound wheeled Purple K extinguishers available. In addition, the solvent extraction annex also had two 350 pound wheeled fire extinguishers and a wet foam extinguisher. Ancillary buildings are equipped with operating sprinkler systems and dry chemical fire extinguishers. Four fire hose cabinets with 2.5 inch lines are available at key locations around the complex. Although the hoses are available the licensee has not provided training for their use. The inspectors recommend that training be instituted on the use of these hoses. The fire hose cabinet south of the solvent extraction annex had a ditch in front of it which could impede access in an emergency. The inspectors recommend that the licensee consider the need for a bridging device to be put over the ditch to allow better access to the cabinet. It was also noted that turnout coats were missing or crumpled at some cabinet stations.

The inspectors observed that the licensee maintains a 250 horsepower pump capable of pumping 2000 gpm onsite, with 250,000 gallons of water specifically reserved in the water storage tank for fire suppression. The pump has an automatic start feature that is actuated if the line pressure drops below 90 psi. The plant is also equipped with a diesel powered emergency generator to provide electricity should the plant lose incoming electrical power. The inspectors noted that the licensee had no records or clear understanding of the electrical load the generator could handle. The inspectors recommend that the licensee research and incorporate the information into their SOP.

The inspectors reviewed the emergency procedures for the mill and found them acceptable. It was noted that the licensee conducts semiannual evacuation drills of the mill complex. The last drill was held on

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The licensee conducts semiannual evacuation drills of the mill complex. The last drill was held on April 2, 1990 and took 14 minutes to complete. The licensee maintains an emergency response team composed of trained site personnel. An ambulance is available onsite which is inventoried monthly and driven weekly. The medical clinic in Blanding, Utah is eight minutes away and the hospital in Monticello, Utah is 29 minutes from the mill.

Records indicate that the licensee conducted weekly fire protection equipment inspections and monthly self contained breathing apparatus (scba) inventories. The solvent extraction foam fire fighting system was inspected weekly and the foam is replaced every five years, with the last exchange in 1986 and the next exchange scheduled for 1991. The inspectors reviewed the report from the last insurance underwriters inspection. The underwriter is Industrial Risk Insurance, whose last inspection was September 21, 1989.

No violations or deviations were identified by the inspectors.

11. Exit Interview

The inspectors met with licensee representatives at the conclusion of the inspection and summarized the purpose, scope, and findings of the inspections.

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Docket File No. 40-8681

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Sub File

*URF

*ABBeach, RIV

GSandborn, RIV

*RSTS Operator

*RITS Operator

*NMIS

*MIS System

*LYandell

RDMartin

RWise

LShea, RM/ALF (AR-2015)

DMB (IE-07)

LLO Branch, LLWM

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PMichaud

DWard

LAnderson, RCPD, UT

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