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WMUR:SZJ
Docket No. 40-6659

MEMORANDUM FOR: Docket File No. 40-6659

FROM: Samuel Z. Jones, Project Manager
Operating Facility Section II, WMUR

SUBJECT: PETROTOMICS RESPONSE TO MILL APPRAISAL FINDINGS

The mill appraisal report for the Petrotomics Mill (I&E Report 40-6659/81-01, November 13, 1981) identified two significant weaknesses in the mill radiation safety program as well as three violations of regulatory requirements. Weaknesses identified were as follows:

- 1) Petrotomics does not have an effective program to evaluate contamination levels in the nonproduction areas of the mill.
- 2) Petrotomics does not have comprehensive, documented procedures relevant to activities of the radiation safety program.

The violations identified were: 1) The licensee had not repaired or taken mitigating corrective action to prevent erosion which had occurred on the upstream face of the tailings dam during July 1981. This was a violation of License Condition 26(b); 2) The licensee did not have an alpha survey instrument available at the main mill exit for the purpose of employee self-monitoring. This was a violation of License Condition 28(a); and 3) The licensee had not posted the yellowcake storage buildings as radiation areas. This was a violation of 10 CFR 20.203(b).

Petrotomics has described their responses to remedy the weaknesses and violations in their letter dated December 9, 1981. In response to the two significant weaknesses, Petrotomics has proposed the following:

- 1) A program to evaluate contamination levels in nonproduction areas was included in the license renewal application dated April 1, 1980, paragraph 5.5-6(5). The licensee stated that the programs would be initiated by January 4, 1982.
- 2) Petrotomics has committed to establishing comprehensive procedures for all aspects of the radiation safety program. The licensee has stated that all procedures will be in effect by January 24, 1982.

The above items will be included in the renewed license for the Petrotomics Mill. This license will be issued in the near future.

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Petrotomics' response to the three violations are as follows:

- 1) The licensee has stated that daily checks of the upstream face of the tailings dam had been performed as required, but the erosion had not been documented by the shift foremen, on the daily inspection log nor had any mitigating actions been taken because it was believed that the problem was insignificant and could be rectified later.

The licensee has stated that necessary corrective actions will be instituted immediately when erosion problems are noted. Petrotomics has committed to an inspection program similar to that specified in Regulatory Guide 3.11.1, "Operational Inspections and Surveillance of Embankment Retention Systems for Uranium Mill Tailings." In addition, the staff will require in the renewed license that Petrotomics submit for NRC review an annual technical evaluation as described in Regulatory Guide 3.11.1, Section 3, Technical Evaluation. The date of compliance was September 16, 1981.

- 2) The licensee stated that an alpha survey instrument was not available for use at the main exit gate because it was sent out for calibration. To correct this problem, a replacement instrument will be used whenever the regular instrument is being calibrated. The date of compliance to this violation was September 1, 1981.

- 3) The licensee has ordered signs to post the yellowcake concentrate storage buildings as radiation areas. In addition, more extensive gamma surveys are being done to insure all areas are properly posted. The date of the compliance to this violation was September 25, 1981.

The WMUR staff concludes that these remedial actions proposed by the licensee are sufficient to correct the weaknesses and violations identified in the appraisal and will be included in the renewed license for the Petrotomics Mill. Therefore, no licensing actions will be required at this time.

ORIGINAL SIGNED BY
 Samuel Z. Jones, Project Manager
 Operating Facility Section II, WMUR

ORIGINAL SIGNED BY

Approved by: Pete J. Garcia, Jr.
 for Harry J. Pettengill, Section Leader
Operating Facility Section II, WMUR

Case Closed: 04006659070S

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