SEP 3 0 1982

WMUR:PJG Docket No. 40-3453 04003453160E SUA-917, Amendment No. 10

Atlas Minerals P. O. Box 1207 Moab, UT 84532

Gentlemen:

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Pursuant to Title 10, Code of Federal Regulations, Part 40, and in accordance with your submittal of December 4, 1981 as revised by letter dated April 28, 1982, Source Material License SUA-917 is hereby amended by adding Condition No. 54 to read as follows:

- 54. Notwithstanding any statements to the contrary in Section 5 of the licensee's revised Safety Analysis Report (SAR) dated August 28, 1975, the licensee shall comply with the following:
 - (a) The line of authority between the Radiation Safety Coordinator (Mill RSO) and the individual onsite with the final responsibility for site operations shall not include any positions having production responsibilities. In addition, the responsibilities of the positions of Radiation Safety Supervisor and General Superintendent as specified in Section 5.5.3 of the licensee's revised SAR of August 28, 1975 shall be assumed by the Radiation Safety Coordinator (RSO) and the Regulatory Affairs Manager, respectively.
 - (b) The RSO shall be responsible for all aspects of the mill radiation safety program and shall have the following minimum qualifications:
 - 1) A bachelor's degree in the physical sciences, industrial hygiene, or engineering from an accredited college or university, or equivalent relevant experience in uranium mill radiation protection. Two years of relevant experience shall be considered equivalent to one year of education.

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- At least one year of work experience in applied health physics or radiation protection.
- 3) At least four weeks of specialized training in health physics applicable to uranium milling, followed by refresher training every two years.
- (c) An audit committee which includes the RSO shall perform a comprehensive annual audit of the mill radiation protection program, and shall prepare a report documenting the audit for distribution to the President of Atlas Minerals and the Uranium Recovery Licensing Branch, USNRC. The audit report shall address all items listed in Section 2.3.3 of draft Regulatory Guide "Information Relevant to Ensuring That Occupational Radiation Exposures at Uranium Mills Will Be As Low As Is Reasonably Achievable," (Task OH-941-4 dated August 1980), and shall also summarize environmental monitoring data and discuss trends in the data.
- (d) The licensee shall implement the program specified in Section 10.7 of their report "Radiation Safety Procedures Manual for Atlas Minerals Uranium Mill, Moab, Utah," submitted by letter dated December 4, 1981.

Al! other conditions of this license shall remain the same.

The effect of this amendment is to update the organization of the radiation safety staff, require certain minimum qualifications for the position of Radiation Safety Officer, and require the implementation of a comprehensive annual radiation protection audit. The issuance of this amendment was discussed via telecon between your Mr. Blubaugh and Mr. Garcia of my staff on September 16, 1982.

FOR THE NUCLEAR REGULATORY COMMISSION

Original signed by J. Line han Sor

R. Dale Smith, Chief Uranium Recovery Licensing Branch Division of Waste Management

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