



DEPARTMENT OF HEALTH & HUMAN SERVICES

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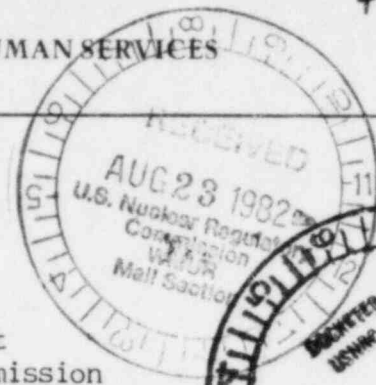
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Public Health Service

40-8781

Food and Drug Administration
Rockville MD 20857

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Mr. Ross A. Scarano
Uranium Recovery Licensing
Division of Waste Management
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Scarano:

The Bureau of Radiological Health staff have reviewed the Draft Environmental Statement (DES) related to the operation of the Teton Project, NUREG-0925, dated June 1982, Docket No. 40-8781, and have the following comments to offer:

1. The solution mining operation and waste management systems proposed by Teton Exploration Drilling in their application for a Source and Byproduct Material License provides adequate assurance that the radon-222 in the gaseous effluents will be controlled to levels as low as reasonably achievable (ALARA). It appears that the calculated doses to individuals and the population resulting from radioactive releases from the Teton project are within current radiation protection standards. It is recognized that there will be (1) routine particulate emissions, and (2) surface discharge of radioactive fluids from the facility.

2. The only environmental pathway identified in Section 4.5.7.2 is the radon-222 releases to the atmosphere. Other pathways are not addressed in this DES since there are planned emissions that would impact on such pathways. The dose calculation methods, models and assumptions (Appendix C and D) used in the estimation of radiation doses to individuals and to populations within 80 km. of the plant have provided the means to make reasonable estimates of the doses resulting from normal operations at the facility. Results of these calculations are shown in Tables 4.11, 4.12, 4.13 and 4.14. These results confirm that the calculated doses meet the 10 CFR 20 regulatory limits. However, in examining Table 4.12, we find that superscript a states that a discussion of the method for calculating the annual 100-year dose commitment is included in Appendix D, Section D.3. Appendix D in this copy of the DES contains only Tables D.1 and D.2. We would appreciate receiving the Sections that appear to be missing from Appendix D.

3. The discussion in Section 4.6.2 on the potential effects of accidents is considered to be an adequate assessment of the environment and health impact from tornadoes or transportation accidents. However, the surface-pipe failures discussion could assess the health impact of thorium-230, radium-226 and uranium-238 reaching Little Sand Creek from an accidental release of 340,000 liters (90,000 gal.) of either pregnant solution or lixiviant between the processing plant and the well field. In addition to the requirement for reporting and cleaning up accidental releases, the NRC should require the applicant to prepare an emergency plan that would address measures for mitigating the consequences of such accidents. It should also include provisions for coordinating the emergency response with the State of Wyoming.

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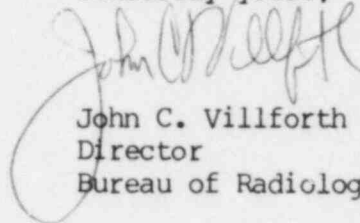
4. The monitoring programs and mitigating measures, as presented in Section 4.4, appear to provide adequate air, water and soil samples at critical locations to measure the potential emissions from the facility. The radiological survey (Section 4.4.1.4) has provided baseline data, but does not indicate if a plan exists, for the operational phase, to conduct periodic resurveys to determine if there is any environmental impact as a result of facility operations.

The operational radiological environmental program (Section 4.4.2.4) has not been defined except for airborne effluent monitoring. It would be helpful if this section could be expanded to identify the specific monitoring programs that may be modified as the radiological data obtained during mining are reviewed by the NRC.

We note that licensing conditions in 5 a. and 5 m. (Summary and Conclusions) require the applicant to take additional measures to implement the monitoring program described in Section 4.4. We agree with this requirement since it supports our comments made above.

Thank you for the opportunity to review and comment on this Draft Environmental Statement.

Sincerely yours,



John C. Villforth
Director
Bureau of Radiological Health