

EXXON MINERALS COMPANY

POST OFFICE BOX 3020 • CASPER, WYOMING 82602

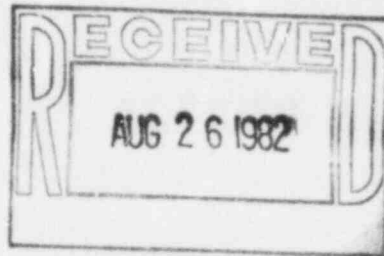
Highland Uranium Operations

August 23, 1982

Docket No. 040-08064
License: SUA-1064

U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

ATTN: Mr. Glen D. Brown, Chief
Technical Program Branch

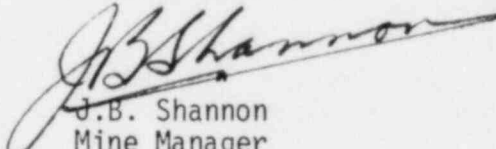


Dear Mr. Brown:

Enclosed please find Attachments A and B which contain our responses to the Notice of Violation and the modified wording of the referenced statement as discussed by your Mr. Jerry Everett and our Paul Estey on August 6, 1982.

We trust the above fulfills our requirements.

Very truly yours,


J.B. Shannon
Mine Manager

JBS/ksk

enclosure

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PDR ADOCK 04008064
C PDR

ATTACHMENT A

RESPONSE TO NOTICE OF VIOLATION

On April 27, 1982, H.P. Estey of Exxon Minerals Company notified your office by telephone that 6 samples from three monitor wells during the first quarter of 1982 had exceeded 120% of the sulfate UCL. Further documentation and explanation were given in the April 30, 1982 letter from J.B. Shannon to J.J. Linehan, Docket No. 40-8064. That letter indicated that measured sulfate values vary widely while other excursion parameters remain stable when there is no actual excursion.

After the inspection of Licenses SUA-1139 and SUA-1064 by Messrs. Blair Spitzberg and Jack Whitten of the NRC on July 1, 1982, a Notice of Violation was issued by NRC, Region IV on July 28, 1982. Exxon continues to believe that sulfate is not a realistic excursion parameter because of its high analytical variability, and it was deleted as a single excursion indicator parameter in the June 30, 1982 license renewal.

To prevent recurrence of a violation of this nature, all analytical data is currently reviewed on a timely basis by the Laboratory Supervisor and the Environmental Specialist. If a 120% UCL for single excursion parameter other than sulfate is exceeded, this timely review will allow reporting and resampling of the affected well within the 48 hour period specified in SUA-1064. With this data review process it is our contention that we have been in full compliance since April, 1982.

SPM/ksk
8/19/82

ATTACHMENT B

Correction to Appendix B, Details, page 3, item 3, second paragraph:

It is suggested to change this paragraph to the following:

"The licensee's representative stated that under operating conditions 138 people were employed at the Highland Uranium Operations. Twenty-eight of these individuals were salaried, with the remaining individuals being hourly. Hourly mill employees were not represented by a union."

SPM/ksk
8/19/82

*note
changed
from
Response*

(Closed) Significant Appraisal Finding (40-8102/81-01): Failure to provide the effluent and environmental monitoring program with adequate sampling frequencies to characterize source material releases, and to provide baseline data for the environmental sampling parameters. The NRC inspectors noted that the individual type, number, and sampling frequency of environmental samples have been increased to meet the current license requirements. In an attempt to provide environmental baseline information, data is being collected from a set of biota samples located remote to the mill site. Increasing the number and frequency of environmental samples and collecting the data from a remote sampling location, closes out this Significant Appraisal Finding.

3. Organization and Administration

The NRC inspectors discussed the organization and administration with a representative of Exxon Minerals Company, hereafter referred to as Exxon, and noted that changes of personnel had occurred in the Safety and Environmental program. The Environmental Coordinator/Radiation Safety Officer (EC/RSO) position had been vacated since the June 1981, mill appraisal, but the position had been filled immediately from personnel resources within the Highland operations. Due to the reduced work force and milling operations, individuals filling positions outlined in the chain of command applicable to radiation safety have dual responsibilities in some areas pertaining to both radiation safety and environmental monitoring.

The licensee's representative stated that under operating conditions 138 people were employed at the Highland Uranium Operations. Twenty-eight of these individuals were salaried, with the remaining individuals being hourly. Hourly mill employees were not represented by union.

4. Internal Review and Audit

The NRC inspectors noted that daily "walk-through" inspections were being conducted by a member of the radiation safety staff, namely the Senior Environmental Technician (SET), with his documented findings submitted to the EC/RSO. Weekly radiation safety inspections were being conducted by the SET and/or EC/RSO with reports of radiation hazards having gone to the supervisor of the areas having radiation safety violations. Monthly radiation safety inspections were conducted by the EC/RSO with resulting radiation safety violations having been reported to the Mill Superintendent and the Mine Manager.

Exxon's commitment to ALARA program was exhibited in the daily, weekly, and monthly radiation safety inspections of the mill complex, and the quarterly audit conducted by Exxon's corporate staff. All of the above facets of the ALARA program identified possible trends and provided recommendations to reduce personnel exposure to all forms of uranium and radon.