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Docket No. 40-8681
04008681301S

UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
URANIUM RECOVERY FIELD OFFICE
BOX 25325
DENVER, COLORADO 80225

NOV 05 1982

MEMORANDUM FOR: Docket File No. 40-8681

FROM: Daniel M. Gillen, Project Manager
Uranium Recovery Field Office

SUBJECT: AMENDMENT NO. 18 TO SOURCE MATERIAL LICENSE
SUA-1358, ENERGY FUELS NUCLEAR - WHITE MESA

By letter dated August 20, 1982, Energy Fuels Nuclear, Inc. (EFN) requested an amendment of Source Material License No. SUA-1358 to change certain requirements regarding the Internal Audit Committee.

Background

License Condition No. 18 of SUA-1358 requires EFN to perform semiannual ALARA audits for the purpose of periodic evaluation of the overall effectiveness of the mill ALARA program. Condition No. 18 also gives details of what shall be included in the audit reports. In addition, License Condition No. 11 requires EFN to operate in accordance with statements in various sections of the license application, including Section 5.1. In Section 5.1.3.2, EFN states the following:

- 1) An Internal Audit Committee, composed of the Radiation Safety Officer, Licensing Director, Mill Superintendent, Chief Chemist and the Manager of Uranium Processing, will be formed.
- 2) A written report to the Vice President of Uranium Operations, describing the results of the audit, results of follow-up actions, and recommendations of the Committee concerning the radiological safety program will be provided.

EFN's Proposal

In the August 20, 1982 letter, EFN requests that the present requirements for the members of the committee be made less precise, since position titles are changed from time to time. Specifically, EFN requests that the Chief Chemist be removed from the committee and that the composition of the committee be described as follows:

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"The Internal Audit Committee shall be composed of a representative or representatives from the corporate licensing staff, mill management, and the radiation safety staff; at the discretion of the licensee, appropriate outside consultants also may be incorporated into the Committee."

Further, rather than requiring that the audit report be submitted to the Vice President of Uranium Operations, EFN proposes that it should be submitted to an executive of at least vice president rank who has authority over mill operation and management.

Proposed Action

The staff has reviewed EFN's proposal and finds it acceptable with the following modifications:

1. It is of utmost importance that the Radiation Safety Officer be specifically identified as a committee member. A representative of the radiation safety staff is unspecific and therefore unacceptable.
2. Consultants or other EFN staff may be incorporated into the committee, but it is not necessary that this be spelled out in the license.

Therefore, the proposed action is the revision of License Condition No. 18 to authorize a less restrictive composition of the Internal Audit Committee by eliminating exact job titles of the committee members where appropriate.

Approval of this amendment with the following revised condition is recommended:

18. The licensee shall perform a formal semiannual ALARA audit. A detailed written audit report prepared by the Internal Audit Committee shall be submitted for review and action to an executive of at least vice-president rank who has authority over mill operation and management. A copy of the audit report shall be sent to the U.S. Nuclear Regulatory Commission, Uranium Recovery Field Office Washington, D.C. 20555, and a copy to U.S. Nuclear Regulatory Commission, Region IV, 611 Ryan Plaza Drive, Suite 1000, Arlington, Texas 76011. The primary purpose of the audit is to evaluate the overall effectiveness of the mill ALARA program. The audit report shall include a summarization of the following operational data:

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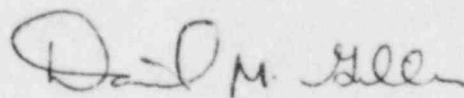
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1. Exposure records (external and time-weighted calculations).
2. Bioassay results.
3. Documented reports of daily, weekly, and monthly inspections by the radiation safety staff.
4. Training program activities.
5. Radiation safety meeting records.
6. In-plant radiological survey and sampling data.
7. Environmental radiological effluent and monitoring data.
8. Reports on radiation overexposures submitted to USNRC, Mine Safety and Health Administration (MSHA), or the State.
9. Reviews of operating and monitoring procedures completed during this time period.
10. Review of Special Work Permits (SWP's) which required that additional radiological monitoring and sampling be performed.

The audit report shall specifically discuss the following:

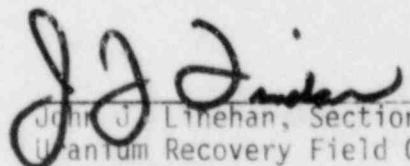
1. Trends in personnel exposures for identifiable categories of workers and types of operational activities.
2. Trends in radiological effluents.
3. The performance of exposure and effluent control equipment, whether it is being properly used, maintained, and inspected.
4. Recommendations on ways to further reduce personnel exposures and effluent releases of uranium and its daughters.

Notwithstanding any conflicting information in Section 5.1.3.2 of the revised license application, the Internal Audit Committee shall as a minimum consist of the Radiation Safety Officer, a representative from the corporate licensing staff, and a representative from mill management.



Daniel M. Gillen, Project Manager
Uranium Recovery Field Office

APPROVED BY:



John J. Linehan, Section Chief
Uranium Recovery Field Office

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