

May 5, 1995

Mr. F. R. Craft, Resident Manager
Homestake Mining Company
P. O. Box 98
Grants, New Mexico 87020

SUBJECT: REDUCTION TO RADIATION MONITORING REQUIREMENTS, SOURCE
MATERIAL LICENSE SUA-1471, HOMESTAKE GRANTS MILL

Dear Mr. Craft:

The U. S. Nuclear Regulatory Commission staff has completed its review of the amendment request submitted in your letter dated January 9, 1995. The review found the proposed revisions to the Grants Mill radiation monitoring program generally acceptable, and the amendment is approved except as noted below. Therefore, pursuant to Title 10 of the Code of Federal Regulations, Part 40, Source Material License SUA-1471 is hereby amended by revising License Conditions (LCs) No. 11, 14, 20, 25, 27, 30, 33 and 35A.

LC No. 14 was amended with alternate language to that proposed in your January 9, 1995, letter. The modification to LC No. 35(A) requested in your letter of January 9, 1995, is not granted in full, as Homestake Mining Company did not request an exemption from 10 CFR Part 20, or include information on the alternate method that would be used to show compliance. These modifications to the January 9, 1995, request were discussed and agreed to in a telephone conversation between yourself and Ken Hooks (NRC) on April 20, 1995.

All other conditions of this license shall remain the same. A copy of the staff's Technical Evaluation Report for the license amendment is Enclosure 1. The license is being revised to incorporate the above modifications (Enclosure 2). An environmental assessment for this action is not required since the license revisions are essentially administrative in nature and are categorically excluded under 10 CFR 55.22(c)(11).

If you have any questions regarding this letter or the enclosures, please contact Ken Hooks at (301) 415-7777.

Sincerely,
Joseph J. Holonich, Chief
High-Level Waste and Uranium
Recovery Projects Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

Docket No. 40-8903
SUA-1471, Amendment No. 21
Enclosures: As stated
cc: J. Virgona, DOE/Grand Junction
Shawn Ghose, USEPA, Region 6
Kerrie Neet, NMED, Superfund
Section
Diane Malone, Navajo Superfund Project

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NAME	KHooks/aeg	VDP	CMcKenney		DGillen		JHolonich	fu	
DATE	5/14/95	11	5/14/95		5/15/95		5/15/95		1/95

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TECHNICAL EVALUATION REPORT

DATE: March 28, 1995

DOCKET NO. 40-8903

LICENSE NO. SUA-1471

LICENSEE: Homestake Mining Company

FACILITY: Grants mill site facility

PROJECT MANAGER: Kenneth Hooks

TECHNICAL REVIEWER: Chris McKenney

RADIATION MONITORING AMENDMENT APPLICATION

SUMMARY AND CONCLUSIONS:

Homestake Mining Company (Homestake) is requesting modification to the existing license for its Grants, NM (Grants) mill site. The site is currently under reclamation with mill demolition, and many clean-up aspects completed. Most of the license conditions, cited by Homestake, can be removed or modified, as requested by Homestake. The change in license condition 35(A) cannot be granted in full, as the licensee needs an environmental monitoring program to show compliance with Part 20. Note that the deletion of license condition 25 does not provide an exemption to Part 20, Subpart C, as the license condition specified the time and method of internal dose calculation; therefore, the provisions of 10 CFR Part 20, Subpart C, still apply.

DESCRIPTION OF LICENSEE'S AMENDMENT REQUEST:

Homestake is requesting modifications to its current license with regard to its radiation monitoring program. The licensee has requested to remove or modify eight license conditions. The requested modifications are as follows:

L.C.	Statement	Modification
11.	The licensee shall determine that employees leaving work are not contaminated with radioactive materials. When an employee has showered and changed clothes prior to leaving work, he may be assumed to be free of contamination.	Remove

14.	Release of equipment or packages from the restricted area shall be in accordance with the attachment to SUA-1471 entitled, "Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use or Termination of Licenses for Byproduct or Source Materials," dated September 1984.	Amend w/ "Any equipment, supplies, or manpower that comes in contact with tailings sand and/or slimes will be determined that no radioactive material is leaving the site by a personal scan and equipment decontamination.
20.	The licensee is hereby exempted from the requirements of Section 20.203(e)(2) of 10 CFR 20 for areas within the mill provided that all entrances to the mill are conspicuously posted in accordance with Section 20.203(e)(2) and with the words, "Any area within this mill may contain radioactive material."	Remove
25.	Occupational exposure calculations shall be performed and documented within 1 week of the end of each regulatory compliance period as specified in 10 CFR 20.103(a)(2) and 10 CFR 20.103(b)(2). Routine airborne ore dust and yellowcake samples shall be analyzed in a timely manner to allow exposure calculations to be performed in accordance with this condition. Required nonroutine monitoring for ore dust and yellowcake exposure shall be analyzed and the results reviewed by the RPA within 2 working days after sample collection.	Remove
27.	All liquid effluents from mill process buildings, with the exception of sanitary wastes, shall be discharged to the tailings impoundment.	Remove

30.	The licensee shall implement a program to minimize dispersal of dust from the ore stockpile area(s). This program shall include written operating procedures. The effectiveness of the control method used shall be evaluated weekly by means of a documented inspection.	Remove
33.	All eating areas and change rooms located in mill process areas shall be spot-checked weekly for removable surface contamination. Areas shall be promptly cleaned if surface contamination levels exceed the values listed in Table 1 or Regulatory Guide 8.30. In addition, all laboratory surfaces used for preparation of bioassay samples shall be spot-checked prior to sample analysis and decontaminated if removable contamination levels exceed 200 dpm alpha/100 cm ² . The results of all surveys and spot checks shall be documented.	Remove
35(A)	<p>The licensee shall implement a compliance monitoring program containing the following:</p> <p>A. Implement the monitoring program shown in Table 2 of the licensee's September 2, 1993 submittal.</p>	Modify to remove environmental monitoring and modify occupational monitoring requirements.

TECHNICAL EVALUATION:

The Grants mill site is undergoing reclamation and mill demolition activities. According to Homestake, some reclamation activities are either complete or very near completion. Most of the tailings impoundments have been covered with at least a radon barrier or interim cover. Nearly all the windblown has been identified and placed in the tailings impoundment. Mill demolition is complete. Currently, a soil verification program is ongoing, along with final consolidation and recontouring of the large tailings impoundment.

Many of the license conditions that Homestake is requesting to be removed were specific license conditions related to activities at the mill processing buildings, and/or operations. In addition, the reclamation has reduced the radiological hazards present at the mill site. Therefore, it is appropriate

that many of the license conditions be removed or modified. The following license conditions should be removed: 11, 20, 25, 27, 30, and 33. The removal of license condition 25 does not constitute an exemption to Part 20; Homestake still must comply with the requirements in 10 CFR Part 20, Subpart C. License condition 14 can be amended with the following alternative language:

"Any equipment, supplies, or manpower that comes in contact with tailings sand and/or slimes will be determined to be free of radioactive material by a personal scan and equipment decontamination."

The modification to license condition 35(A) is not granted in full as the licensee must request an exemption from Part 20, or include information on the method that the licensee will alternately show compliance, to end environmental monitoring. Homestake did not request an exemption or provide information on a revised radiation protection program. License condition 35(A) can be modified to include the new occupational monitoring requirements but cannot be modified to remove all environmental monitoring from the Grants mill site. Since releases will continue, with potential offsite exposure, the licensee will need to continue environmental monitoring as currently required by license condition 35(A) to determine offsite dose. However, the licensee can submit an amendment request for exemption or propose an alternative method of compliance.

Additionally, LC 37(H) has been deleted since the requirement was satisfied by Homestake's submittal of a revised site Reclamation Plan by letter dated October 29, 1993.