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SLR: 89 40-2341 Grai. II (FU Pend.) 1st Enfance. Ltr Some citations

American Potash and Chemical Corporation 258 Ann Street West Chicago, Illinois

Attention: Mr. Bruce J. Bennett. Plant Menager

Gent Lesen:

Tale refers to the importion confected on December 15, 14 and 17, 1964, of your activities sutherized under AEC Source Material License No. 57A-533.

It spears that certain of your metivities were not conducted in full compliance with the requirements of the ASC's "Standards for Protection Against Mediation," Part 20, Title 10, Code of Tederal Seguistions, in that:

- i. Two employees received whole body radiation dones of 1270 milliters and 1560 milliters respectively, during the first calendar quarter of 1963, and one employee received a whole body radiation done of 1290 milliters during the fourth calendar quarter of 1963, contrary to 10 CF2 20.101. "Expansure of individuals to radiation in restricted eress." Since no form AEC-6 had been completed for these individuals, their whole body exposures should have been itsited to 1.25 reas buring the periods in question.
- 2. Surveys of radiation levels within the plent were inadequate to assure compliance with 10 CPR 20.101 with respect to the external radiation does received by exployees, contrary to 10 CPR 20.201(b), "surveys."

MAR 8 - 1965

8507100440 850408 FDR FOIA NAPKIN85-30 PDR 3. Surveys conducted inring the verious thortun processing operations were inadequate to determine compliance with 10 CFR 20.103 with respect to the airborne concentrations of thorium to which exployees were exposed, contrary to 10 CFR 20.201(b), "Surveys."

. 2 -

4. The Prep Anom Area where source material was used and etoral was not posted as required by 10 CFR 20.203(e)(2), "Caution signs, labels, and signals."

We note that items of noncompliance similar to the ones described in Items 1, 2 and 3 above were found also during the last previous inspection and brought to your attention in our notice dated Sovember 29, 1962.

This motice is sent to you pursuont to the provisions of Section 2.201 of the AEC's "Raise of Fractice." Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office, within twenty (20) Jays of your receipt of this motice, a written statement or explanation in reply including (1) corrective stape which have been taken by you, and the results achieved; (2) corrective steps which will be taken; and (3) the date when full compliance will be achieved.

Regarding Itam 3 above, we note that time weighted exposures were not determined for exployees who worked at times in areas where the airborne concentrations of thurium exceeded the airborne concentration limit applicable for 40 hours exposure in a period of seven somescutive days.

whe understand that surplus equipment which could be contaminated with thorium is on occasion sold by the Corporation as array. It is noted that while the equipment is usually stemm-classed prior to

American Potash and Chemical Corporation -3-

transfer, this has not been fone in every case. Also, we understand that scrap equipment has never been surveyed for contemination prior to its rulease. With your reply, please inform us of the steps which have been or will be taken by you to assure that scrap equipment, which has been used in thorium processing operations, is deconteminated to the extent set forth in our enclosure, prior to its release to uniformed recipients.

Very truly yours,

Eber 2. Price, Director Division of State and Licensee Smintions

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Enclosure:

Redimentivity Contemination Limits for Abandonument of Facilities and Equipment

bcc: Compliance Div., HQ Compliance Div., III Public Document Room

SLR: EB

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