

Atlas Minerals
Division of Atlas Corporation
P.O. Box 1207 Moab, Utah 84532

November 28, 1978

Mr. Glen D. Brown, Chief
Fuel Facility and Material Safety Branch
United States Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

RE: Our letter to you dated October 2, 1978

Mr. Brown:

This letter is to provide further detail on the responses in our October 2 letter, as you requested in your letter of October 19. The data needed relates to items 2, 3, 5, and 6 of your Notice of Violation, so we will respond by item.

ITEM 2

In Mr. Mike Mustain's call of October 19, 1978, he suggested that it would be helpful if we provided a discussion of just how respiratory protection equipment is selected at Atlas to fulfill the requirement of paragraph C.2, Regulatory Guide 8.15. As stated in our October 2 letter, we select respiratory protection equipment adequate to provide the appropriate protection factor based on the ambient air count history of the area involved. This is exactly as specified in C.2, "For the purposes of this guide, the concentration of radioactive material in the air that is inhaled when respirators are worn may be initially estimated by dividing the ambient concentration in air by the protection factor specified in table I." In following this guideline at the Moab Mill, in essentially all cases, respirators are specified to assure

$$\frac{\text{ambient air concentration}}{\text{respirator protection factor}} \leq 1 \times 10^{-11} \text{ uc/ml U nat.,}$$

which is much lower than the MPC of 10×10^{-11} uc/ml U nat. The exposure potential is later calculated based on (in the case of non-routine maintenance) personal air sampler results. And the actual exposure is determined in all cases by bioassay. This is also in accordance with C.2, "If a respirator user's intake of radioactive materials is later determined by other measurements to have been greater than that expected from initial estimates of radioactive materials in the air the user inhales, the greater quantity is to be used in evaluating exposures; if it is less than initially estimated, the lesser quantity may be used in evaluating exposures."

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ITEM 2 cont'd.

This procedure to avoid noncompliance was in effect at the time of our October 2 letter. We feel it will, and is, assuring compliance with paragraph C.2. of Reg. Guide 8.15.

ITEM 3

The corrective action taken to comply with 10 CFR 21.21 was to develop and implement an appropriate procedure, as 21.21 requires. This is complete at the time of our October 2 letter - as stated in the letter.

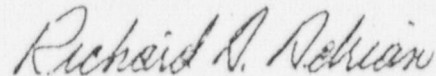
ITEM 5

As discussed in our October 2 letter, the inventory report required by 10 CFR 40.64 (b) was not submitted in 1977 because of an oversight on our part which occurred in the wake of an accounting department reorganization. This task has now been assigned specifically to our administrative accountant. We believe this will prevent a recurrence of this problem. The missing 1977 report was filed on August 14, 1978. The 1978 report was filed on October 16, 1978 - within 30 days after September 30, as required.

ITEM 6

The posting requirements of 10 CFR 21.6 were satisfied by posting the required material on the main plant bulletin board. The task of seeing that the material remains in place has been assigned to the personnel secretary, who makes a daily check. The posting requirement was fulfilled by October 2. The check system was initiated on October 19, 1978. We are now in full compliance.

Sincerely,



Richard A. Adrian
General Superintendent

RAA:sd