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Docket File 40-8714

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40-8714/GRK/88/01/04/0

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JAN 6 1988

URFO:GRK

Docket No. 40-8714

04008714510E

Cleveland Cliffs Iron Company
ATTN: Mr. Truman E. Louderback
818 Taughenbaugh Boulevard
Rifle, Colorado 81650-2730

Gentlemen:

Our office is in receipt of your December 22, 1987 correspondence discussing the pending transfer of process equipment and resins containing various levels of radioactivity. Because you have asked a variety of questions, we will discuss them on a paragraph basis.

You have accurately quoted the definition of source material. Due to this and the fact that Cleveland Cliffs Iron Company (CCIC) has not milled thorium ores, you are correct in deducting that uranium is the only form of source material at the site.

Your letter also contains a discussion of the definition of discrete as related to byproduct materials and waste. Please note that your survey records do not indicate that all wastes have been removed from the process equipment. Similarly, it is not possible to determine if all wastes have been removed from the resins, due to the lack of laboratory analysis. Based upon these two points, we conclude that the equipment and resins do contain byproduct material. Also, please note that the equipment and resins may be transferred to a facility with an appropriate license of which Homestake Mining Company possesses.

Please see our letter of December 15, 1987, concerning your question on disposal methods of process equipment if it contains less than 15 pounds of source material. We would draw your attention to our former conclusion that "we see no feasible way for CCIC to demonstrate that the materials proposed for transfer contain less than this amount."

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As discussed in License Condition No. 21, resin may only be disposed of in an appropriate disposal site. However, the resin may be transferred to another licensee without an amendment to your source material license.

CCIC is responsible to deliver all materials and equipment to the carrier according to DOT regulations. This action must be documented by appropriate radiation surveys, as well as a bill of lading. However, CCIC is not responsible for the equipment and materials while in transit.

You are correct in noting that the expiration date on Source Material License SUA-1471 is February 29, 1976. However, the license is considered to be in timely renewal; therefore, the license is valid and Homestake Mining Company is authorized to receive the materials in question.

TLD monitoring at the site is no longer required on an individual basis. However, it is still CCIC's responsibility to determine individual exposures. Amendment No. 8 to your license deleted the requirements for routine air sampling. The type of work that could take place at the site would require continuous and representative air monitoring while the tasks are being undertaken.

We hope that this correspondence has answered your questions. If not, please contact Gary Konwinski of my staff.

Sincerely,

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Edward F. Hawkins, Chief
Licensing Branch 1
Uranium Recovery Field Office
Region IV

Case Closed: 04008714510E

OFC : URFO : URFO
NAME : GKonwinski/lv EHawkins
DATE : 88/01/05 : 1/6/88