CLIMAX URANIUM COMPANY UNIT OF AMERICAN METAL CLIMAX. INC.

> P. O. BOX 989 GRAND JUNCTION, COLORADO

November 19, 1963

United States Atomic Energy Commission Division of Licensing and Regulation Washington 25, D. C.

Attention: Mr. Eber R. Price

Assistant Director

Reference: LR:GWK

40-1142

LaR File Copy

Gentlemen:

We cannot reconcile ourselves to the allegation, made in your letter of November 1, 1963, that certain of our activities have not been in full compliance with the regulations of the AEC Standards for Protection Against Radiation. In your letter of March 8, 1962, you alleged that we had made violations of the cited regulations which are, in substance, identical with the violations numbers 1, 2 and 3 of your letter of November 1, 1963. The difference between your communications dated March 8, 1962 and November 1, 1963 is the period of time which the violations are purported to have occurred.

In our letter of March 30, 1962, we replied to your citation of violation dated March 8, 1962 and in the last paragraph of our letter we indicated that the concentration to which the roaster operator was exposed was 2.1 x 10-11 micro curies per ml. of air. This average concentration was determined during the period February 1, 1962 to February 15, 1962 and this average was reported to you in our referenced letter. Since we have had no sampling results subsequent to our letter of March 30, 1962 that would indicate over exposure of the roaster operator has occurred, we are at a loss to understand the first three violations which you have cited.

With regard to the fourth citation of your letter regarding the notification requirements for 10 CFR 20.403 (b) "Notification of incidents", we realize that, in this instance, we did violate the cited regulation. Since this violation was called to our

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attention during the inspection of our facilities in August, 1963, we have informed all levels of our managerial staff of the requirements of this section of the regulation and have impressed upon these individuals the necessity of notification within the 24 hour limit specified in the regulation. It is our earnest intent that in the event of any accident in the future which would require notification to the Division of Compliance that this notification shall be promptly submitted.

Yours very truly,

CLIMAX URANIUM COMPANY

Anthony Mastrovich
General Manager

AM/REM/kb