

04008904250E

40-8904

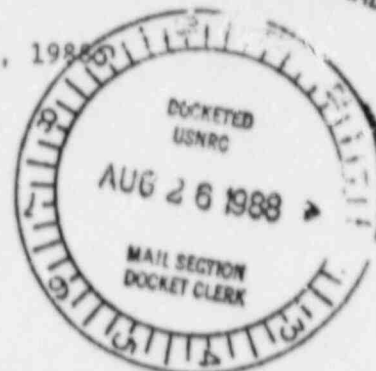
INTERA

Inters Technologies Inc.
Suite 300
6850 Austin Center Blvd.
Austin, Texas 78731

Tel.: (512) 346-2000
Telex: 792 352
Telecopier: (512) 346-9436

RETURN ORIGINAL TO PDR, HQ.

Mr. Harry J. Pettengill, Chief
Licensing Branch
Uranium Recovery Field Office
Region IV
730 Simms Street, Suite 100A
Golden, CO 25352



RE: Docket No. 04008904 1800; L-Bar License (SUA-1472) Amendment Application

Dear Mr. Pettengill:

INTERA Technologies and BP AMERICA are in receipt of Amendment No. 7 of Materials License SUA-1472 deleting Condition No. 15 and clarifying the language in Condition Nos. 20, 21, 22 and 24 to reflect the current activities at the L-Bar site. We note, however, that Condition No. 19, which requires the RSO to possess the minimum qualifications as specified in Section 2.4.1 of Regulatory Guide 8.31, remains unchanged. This requirement is oriented to the operation of a uranium mill, the concentration operations at a mill and the potential for significant high level exposure at a mill. At the L-Bar site, milling operations have ceased and the mill itself has been dismantled and disposed of. All that remains of the milling operation is the tailings area and the remnants of the tailings pond, which will be undergoing reclamation shortly. As such, we feel the requirements set forth in Condition No. 19 are inappropriate for a site with only low-level, by-product materials present. We therefore request that Condition No. 19 be deleted from the license and that the RSO qualifications be judged relative to the conditions and potential risks as they exist at the site. The \$150 amendment application fee is enclosed.

We propose that TMA/Eberline of Albuquerque continue to provide RSO services for the L-Bar site. However, Rick Carr, our previous RSO, has resigned from TMA/Eberline and therefore must be replaced. TMA/Eberline has proposed that his replacement be Kathy Dendahl, health physicist from their Albuquerque staff. Her resume is included for your review and approval. Ms. Dendahl will be under the direct supervision of their Manager of Field Services, Mr. Jeffery Brown, as was our previous RSO. Additionally, TMA/Eberline's entire staff of radiation safety and health physics personnel are available to her on an as-needed basis.

8809160223 880818
PDR ADOCK 04008904
C PDC

License Fee Information
on next page

H01100C372

DESIGNATED ORIGINAL

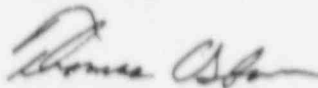
Certified By Mary C. Hood

88-1165

Ms. Dendahl is experienced in environmental monitoring at nuclear waste sites and has substantial field experience monitoring for nuclear constituents utilizing a wide variety of methods. In addition to baccalaureate degrees in both chemistry and biology she has had 4 years of experience at uranium and thorium remediation/reclamation facilities in New York, New Jersey and Ohio and has had several radiation training courses. INTERA and Eberline propose to employ Ms. Dendahl as the site RSO for the reclamation phase of the contract. We would appreciate any comments or questions you have on this appointment. A reclamation construction contract has been let for the site and reclamation is scheduled to commence in a matter of weeks.

We look forward to your response.

Sincerely,



T.G. Osborn
Project Coordinator

cc: G.E. Grisak, INTERA
Ralph DeLeonardis, BP AMERICA

LOG	Sept 88-1
Remitter	
Check No.	5836
Amount	\$150
For	2E
Type of Fee	Amendment
Date Check Rec'd	9/6/88
Date Completed	9/13/88
By	Jackson

H01100C372

INTERA

TMA/EBERLINE
Biographical Data
Katherine Dendahl
Health Physicist

Experience Summary

Ms. Dendahl has nearly four years experience in health physics, remedial investigations and remedial/reclamation projects. She is particularly experienced in the analytical protocols (for all matrices) of the uranium and thorium series.

Experience

1988 to present	TMA/Eberline, <u>Quality Assurance Representative</u> . Responsible for review of all laboratory QC data including data presented to the EPA for the intercomparison laboratory program. Reports directly to the Corporate Quality Assurance Manager.
1987 - 1987 July December	TMA/Eberline, <u>Laboratory Manager - New Jersey</u> . Responsible for directing the efforts of the field laboratory facility including the analysis of soil samples for U-238, Ra-226, and Th-232 collected from a remedial/reclamation facility in central New Jersey.
1987 - 1987 Jan. June	TMA/Eberline, <u>Laboratory Manager - Ohio</u> . Responsible for directing laboratory efforts during a remedial investigation at a DOE uranium production facility in Ohio. Prior to development of the field counting facility, performed walk-over radiation scans of the waste storage area.
1986 - 1986 June December	TMA/Eberline, <u>Laboratory Manager - New Jersey</u> . Responsible for directing the field laboratory efforts during a major remediation/reclamation of a former uranium ore sampling facility in central New Jersey. Provided access control supervision by issuing dosimeters to radiation workers, and releasing personnel, equipment, and materials from the controlled area as required.
1986 - 1986 March May	TMA/Eberline, <u>Laboratory Technologist - New York</u> . Responsible for the analysis of radium bearing soils via gamma spectrometry.

Katherine Dendahl
Page two

Experience (Cont'd)

1986 - 1986	TMA/Eberline, <u>Laboratory Technician - New Mexico.</u>
Jan. February	Responsible for radon de-emanation of samples of various matrices being analyzed for Ra-226 along with final data reduction.
1985 - 1985	TMA/Eberline, <u>Laboratory Technologist - New Jersey.</u>
May December	Responsible for the analysis of soil samples via gamma spectrometry, water samples via gross alpha, and air particulate filters via gross alpha during remedial activities at a central New Jersey site.
1984 - 1984	TMA/Eberline, <u>Laboratory Technician - New York.</u>
Sept. December	Responsible for radon sampling/analysis, water sampling/analysis, and soil analysis via gamma spectrometry at a waste storage site in western New York.

Education

B.A. Chemistry, New Mexico State University, 1984
B.S. Biology, New Mexico State University, 1985
Nuclear and Radiochemistry, New Mexico State University, 1984
Radiation Worker Training, New York, 1984
Radiation Instrumentation Calibration/Repair, 1987

I have previous remedial/reclamation experience from the Niagra Falls Storage Site (NFSS). NFSS is a remedial action site under the Formerly Utilized Sites Post Remedial Action (FUSRAP) Program sponsored by the USDOE. The prime contamination were K-65 residues containing up to 0.5 uR/hr of Ra-226. While I was there, I performed sample collection of radon gas using the Grab Method, air particulates, water and sediment samples. I performed gross alpha analysis of water samples as well as settleable matter using the Imhoff Method. I performed gross alpha analysis radon bags using Lucas cells and an Eberline Model SAC R-5 (scintillation alpha counter) connected to an MS-2 mini-scaler/ratemeter. Performed data analysis of gross alpha of waters, radon bags, air particulates, and gamma spectrometry analysis of soil samples.

I have the following training:

1. Nuclear and Radiochemistry - NMSU, 1984: This was a course on radiation and detection methods. Classwork went into the nuclear model of radiation and radiation types. Labwork demonstrated shielding effects for radiation (using various materials), decay and ingrowth, and detection distance from the detector.
2. Radiation Worker Training Course - 1984: This was a training program explaining the different kinds of radiation, how one is exposed to radiation types, access in and out of restricted areas, limiting time to restricted areas as applicable, clothing required in restricted areas, and equipment used for scanning.
3. Radiation Instrument Calibration/Repair Training Course - 1987: This was a course to train individuals in the field the methods required to calibrate the Eberline Model AC-3 Alpha Scintillation Probe, Eberline Model HP-260 geiger (beta/gamma) probe, and the Eberline Model HP-210 pancake-geometry geiger (beta/gamma) probe. The course went into detail on the disassembly, cleaning of, reassembly and calibration of the above probes. Instruction included troubleshooting and decay correcting calibration check sources, if applicable.

I am also experienced with and have performed calibrations of the Eberline Model RAS-1 regulated air sampler using a Kurz Mass Flowmeter.