

ENCLOSURE

Exxon Company, U. S. A.
P. O. Box 2180
Houston, Texas 77001

License No. SUA 1139 (Docket No. 40-8102)

Certain activities under your license appear to be in violation of AEC requirements.

The following violation is considered to be of Category I severity.

1. 10 CFR 20.103(a), "Exposure of individuals to concentrations of radioactive material in restricted areas", requires that no licensee shall use licensed material in a manner to cause an individual in a restricted area to be exposed to airborne concentrations in excess of the limits specified in Appendix B, Table I, of Part 20.

Contrary to this requirement, during the week ending December 30, 1972, two employees received inhalation exposures to uranium concentrations of 1.0×10^{-10} uCi/cc and 2.3×10^{-10} uCi/cc. The limits for these two employees were 6.0×10^{-11} uCi/cc and 1.4×10^{-10} uCi/cc, respectively, based on time weighted Appendix B, Table I values. (The inspector noted that the corrective action stated in correspondence to the Commission dated February 14, 1973, was implemented and no further correspondence on this item is required.)

The following violations are considered to be of Category II severity.

2. License Condition No. 8 requires that ore processing be conducted in accordance with procedures contained in the license application dated August 12, 1971. Page 18 of the application states that the mill superintendent, safety engineer, or their delegate, shall evaluate special maintenance tasks, perform necessary dust sampling and mark and initiate work orders showing ore sampling status or requirements.

Contrary to this requirement, the special work orders were not always initiated, marked by designated personnel, or completed to show air sampling requirements for unusual maintenance operations.

3. 10 CFR 20.201(b), "Surveys", requires that each licensee shall make surveys or evaluations for purposes of demonstrating compliance with the regulations in Part 20. 10 CFR 20.103, "Exposure of individuals to concentrations of radioactive material in restricted areas", states that no licensee shall use licensed material in a manner as to cause any individual in a restricted area to be exposed to airborne concentrations in excess of the limits specified in Appendix B, Table 1, of Part 20.

Contrary to this requirement, no surveys or evaluations were made of the airborne concentrations to which employees were exposed during the performance of thirty-six nonroutine maintenance operations during the period November 26, 1972 to April 22, 1974.