

## DISTRIBUTION

Docket File 40-8714  
 c/o DMB (IE-07)  
 LFMB  
 DBangart, RIV  
 GKonwinski  
 EHawkins  
 DPowers, RIV  
 JPerry, Info Systems  
 YElko, RIV  
 WDEQ (2)  
 JHaes, RCPD, WY  
 LLO Branch, LLWM  
 Suspense File  
 URFO r/f

40-8714/GRK/88/01/05/0

- 1 -

JAN 6 1988

URFO:GRK  
 Docket No. 40-8714  
 License No. SUA-1352  
 04008714520E

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

Gentlemen:

Thank you for your letter of December 22, 1987, in response to our letter and the attached Notice of Violation dated December 4, 1987. We have reviewed your reply and are pleased to hear that the facility will be posted according to the requirements of License Condition No. 23.

Our inspection report and accompanying Notice of Violation did not discuss the low levels of airborne radionuclides that existed at the site during the standby period. You have adequately verified these levels and our staff does not dispute the results. You are, however, considered to be in violation of 10 CFR Part 20.103(a)(3) because "suitable measurements" were not taken during the time that process equipment was being dismantled. Our office considers suitable measurements, during such nonroutine tasks, to consist of continuous breathing zone sampling or continuous applicable general air sampling.

The apparent violation 3.A. notes that documentation of training was not available at the time of the inspection. Because you have supplied the appropriate training forms as an attachment to your December 22, 1987 correspondence, this situation is no longer considered a violation.

The discussion of apparent violation 3.B. centers on a commitment by CCIC, as detailed in License Condition No. 35, to submit a schedule for site decommissioning to the Uranium Recovery Field Office for review and approval. Our office considers your dismantling work to represent decommissioning of the site; as such, it was not conducted in accordance with License Condition No. 35.

1/0

OFC :	:	:	:	:	:	:	:
NAME :	:	:	:	:	:	:	:
DATE :88/01/05	:	:	:	:	:	:	:

8801110199 880106  
 REG4 LIC40  
 SUA-1352

RCD PDR

JAN 6 1988

- 2 -

We are pleased to learn that all contaminated process equipment and resins have been moved into the process building. This represents an appropriate corrective action for this noncompliance issue. Additionally, this will aid in assuring that no contaminated materials are removed from the site by unauthorized individuals.

Based upon your December 22, 1987 letter and our December 4, 1987 Notice of Violation, the number of noncompliance items has been reduced to four. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and maintained.

Sincerely,

151

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

Case Closed: 04008714520E

OFC :	URFO	:	URFO	:	:	:	:	:
NAME :	GKorwinski/lv	:	EHawkins	:	:	:	:	:
DATE :	88/01/05	:	1/6/89	:	:	:	:	: