40-3453

Atlas Minerals Division of Atlas Corporation

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January 26, 1988





RETURN ORIGINAL TO PDR, HQ.

HAND DELIVERED 1/28/88

Mr. Harry Pettengill, Chief Nuclear Regulatory Commission Uranium Recovery Field Office P. O. Box 25325 Denver, CO 80225

> Re: License No. SUA-917 Docket No. 40-3453 Revision to Interim Stabilization Control Procedure

Dear Mr. Pettengill:

This is to further respond to item (a) of the Notice of Violation (NOV) previously addressed in our submittal dated December 21, 1987 concerning the procedures for preventing/ controlling windblown tailings.

The enclosed revision to our Interim Tailings Stabilization Control Procedure (Item 12.0 of the Radiation Safety Procedures Manual) is being submitted in order to clarify further our procedure, especially as it applies to those situations where windblown tailings may result in restricted area soil concentrations of Ra-226 in excess of 5 pCi/g above background in the top 15 centimeters of soil and unrestricted area soil concentrations in excess of 5 pCi/g above background in the top 15 centimeters of soil.

The revised procedure was reviewed with Van Scoville of your staff January 19, 1988.

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I trust this satisfactorily completes our response to the NOV concerning a comprehensive written procedure for the interim stabilization of windblown tailings. Please contact me at your convenience should you have any further questions or comments.

Sincerely,

Richard E. Blubaugh

Richard E. Blubaugh Regulatory Affairs Manager

REB:jt

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Enclosure

- cc: R. T. Exby W. M. Jensen
 - D. L. Edwards

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12.0 INTERIM TAILINGS STABILIZATION CONTROL PROCEDURE

This procedure provides additional details to the tailings stabilization control program specified in Atlas' March 16, 1987 submittal to NRC. This is not a replacement procedure, simply a clarification.

Materials

Inspection report forms shown in Tables 6, 7 and 8 of Section 5.5.
Four wheel drive truck, or other capable vehicle.
Tank truck with pump and hose.
Supply of CPB-12 from WEN-DON.
Eberline ur/hr meter, or the equivalent.
Atlas' delta gamma housing.
Soil sample probe.
Sample bags, labels.
Planchets.
Eberline alpha scintillation counter. Model PD-13, or equivalent.

Eberline alpha scintillation counter, Model RD-13, or equivalent. Eberline mini-scaler, Model MS-2, or the equivalent.

Procedure

 Twice each year, spray an application of WEN-DON'S CPB-12, or equivalent, at the manufacturer's recommended application rate, on the exposed beaches and embankment areas containing

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tailings. Application can be made by hydro-sprayer, handheld hoses or a combination. The applications should be made in the early Spring and in the Fall.

- 2. During the inspections described in Section 5.5, operators shall make particular note of any blowing tailings or tailings sand movement and so note on the inspection forms shown as Tables 6, 7 and 8 in Section 5.5. If, in the opinion of the operator, there appears to be a significant movement of tailings, the operator shall also contact the Mill Coordinator or his designee immediately.
- 3. When a report, verbal or written, is made by an operator that tailings movement has occurred or is occurring, the Mill Coordinator (who reviews the reports daily) will notify the Radiation Control Coordinator. Together they will make a visual confirmation inspection of the area in question. If the visual confirmation inspection indicates that significant tailings movement has occurred:
 - o The Mill Coordinator will initiate spot treatment at damaged areas and blown tailings with the binding agent as soon as possible. A supply of the binding agent is stored at the Mill for this purpose. If wind erosion

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is extensive, a complete reapplication may be made.

- The Radiation Control Coordinator will make gamma, delta gamma, and/or soil gross alpha measurements to determine if surrounding soils exceed 15 pCi/g Ra-226 above background in the top 15 centimeters of soil.
- 4. If it is determined that the surrounding soils contain less than 15 pCi/g Ra-226 above background, but are likely to be in excess of 5 pCi/g in the top 15 centimeters of soil:
 - The Radiation Control Coordinator will inform the Regulatory Affairs Manager and Moab Operations Manager with a written report within 24 hours.
 - The Moab Operations Manager will issue instructions to stabilize the surrounding soil likely to contain Ra-226 in concentration which is between 5 pCi/g and 15 pCi/g, as designated by the Radiation Control Coordinator. Stabilization with the chemical dust suppressant will be done at the earliest practical time.

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5. If in the opinion of the Radiation Control Coordinator and the Mill Coordinator, blown tailings were transported beyond the restricted area boundary, the Radiation Control Coordinator will also conduct gamma, delta gamma, and/or soil gross alpha measurements to determine if soils in the unrestricted area contain Ra-226 in excess of 5 pCi/g above background in the top 15 centimeters of soil.

6. If it is determined that the surrounding soils are likely to contain Ra-226 in excess of 15 pCi/g above background in the top 15 centimeters of soil; or that soils beyond the restricted area boundary are likely to contain Ra-226 in excess of 5 pCi/g above background in the top 15 centimeters of soil:

- o The Radiation Control Coordinator will so inform the Regulatory Affairs Manager and Moab Operations Manager immediately by telephone and follow-up with a written report.
- o The Radiation Control Coordinator will, after conference with the Regulatory Affairs Manager, conduct additional soil sampling in the suspected contaminated area in accordance with acceptable soil sampling

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methodology and send a split sample(s) of this soil to a commercial laboratory capable of analyzing Ra-226 to the LLD specified by NRC.

- 7. If the analytical results from the commercial laboratory confirm that the concentrations of Ra-226 in the restricted area is in excess of 15 pCi/g Ra-226 above background, or that the concentration or Ra-226 in the unrestricted area is in excess of 5 pCi/g in the the top 15 centimeters of soil, the Radiation Control Coordinator will immediately so inform the Regulatory Affairs Manager and the Moab Operations Manager.
- 8. The Regulatory Affairs Manager and the Moab Operations Manager will jointly prepare a plan of action within five working days of being notified by the Radiation Control Coordinator of the confirmation analysis. This plan of action will be submitted for review by the NRC.
- 9. The contaminated soils will be removed, stabilized in place or otherwise handled as specified by the U.S. Nuclear Regulatory Commission after a complete review of the available data and circumstances.

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10. After the final action, the Radiation Control Coordinator will sample, monitor or otherwise provide the surveillance necessary to assure compliance with the applicable requirements and make periodic reports to the Regulatory Affairs Manager and the Moab Operations Manager.

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