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ANACONDA Minerals Company
New Mexico Operations
P.O. Box 638
Grants, New Mexico 87020
Telephone 505 876 2211

RETURN ORIGINAL TO PDR, HQ.

February 27, 1989

Mr. Dale Smith
Director,
Uranium Recovery Field Office, Region 4
U.S. Nuclear Regulatory Commission
P.O.Box 25325
Denver, Colorado 80225

RE: License No. SUA-1470
Docket No. 40-8902

Dear Mr. Smith

On december 27, 1987, Anaconda Minerals Company submitted the Bluewater uranium Mill decommissioning Plan to your office. Anaconda would like to modify the following aspects of the decommissioning plan as a result of recent discussion with your staff.

1. Section 3.1 specifies the maximum levels of surface contamination of material and equipment released for unrestricted area use. Anaconda wishes to clarify the methodology for determination of the surface contamination levels. As discussed with Mr. Pete Garcia of your staff on February 1,1989, the maximum levels of surface contamination for personal skin and clothing as well as material and equipment released for unrestricted area use in USNRC Reg. Guide 8.30 and license attachment to License # SUA -1470 are based on the radioactive disintegration coming out of the contaminated surface i.e. 2π emission . It was agreed with Mr. Garcia that the determination of surface contamination by using a 2π geometry efficiency of the instrumentation would be within compliance with USNRC requirements. Anaconda will use the 2π Geometry efficiency of the detector along with all other required geometry such as correction for detector active surface area to unit (100 cm^2) surface area.

2. Section 5.4.1 states that all workers will be tested for comprehension of the radiation safety training. Based on our discussion with Mr. Howard Rose during November 1988 inspection and follow up on this matter with Mr. Pete Garcia, Anaconda will initiate a written testing program to determine the comprehension of radiation safety training of workers.

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3. Section 5 2.1 states that bioassay (urinalysis) will be performed for individuals working in the restricted area. Based on discussion with Mr. Garcia, Anaconda will perform a bioassay (urinalysis) at the beginning and at the termination of the employment for all the individuals working in the restricted area. A bi-weekly bioassay will be performed for individuals working in the Yellow Cake section of the mill.

4. The lunch area and change house in the restricted area will be monitored weekly for contamination levels stated in section 5.6.4 of the decommissioning plan.

5. The maximum permissible concentration (MPC) for airborne radioactive materials to be included in section 5.2.1 of the decommissioning plan will be: 1.0E-10 uCi of gross alpha activity per ml of air for all areas of the mill site (ore crushing, leach area, decantation area(CCD), solvent extraction, tailings and yellow cake area); 1.0E-10 uCi of U-natural per ml of air in Yellowcake processing area (solvent extraction and yellowcake area) and 5.0E-11 uCi of U-natural per ml of air for all areas of the mill site except the yellowcake processing area.

Enclosed are the background radium concentrations in soil in the vicinity of the Bluewater Mill that Mr. Garcia requested. This study was done by Rogers and Associates Engineering Corporation during September 1988.

Should you have any questions or require additional information, please contact me.

Sincerely,

Ronald S. Ziegler
Manager,
Bluewater Mill

np/RSZ

pc: R. Krablin
L. Milner
P. Bergstrom
N. Patel