BOKUM RESOURCES CORPORATION

P. O. BOX 1833 142 W. PALACE AVENUE SANTA FE, NEW MEXICO 87501 (505) 982-1824

February 16, 1978

Mr. Theodore A. Wolff, Program Manager State of New Mexico Radiation Protection Section P.O. Box 2348 Santa Fe, New Mexico

RADIATION PROTECTION SECTION

Dear Mr. Wolff:

Please find hand delivered to you this day ten copies of Bokum Resources Corporation's license application for our proposed Marquez Uranium Mill. Each copy of the application includes two volumes. The first volume includes the License Application, the Mill Radiation Safety Program and the Environmental Report. The second volume presents appendices referred to in the Environmental Report.

Since Bokum Resources intends to have the proposed mill operational in the first quarter of 1979, your timely action upon our application would be greatly appreciated. If you have any questions regarding this submittal please contact me.

Very truly yours,

Jom. P. Brance

Wm. P. Biava Executive Assistant

Enclosures

cc: Patrick Donahoe

WPB:cjh

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BOKUM RESOURCES CORPORATION

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APPLICATION FOR RADIOACTIVE MATERIAL LICENSE

INSTRUCTIONS-Complete Items 1 through 16 if this is an initial application. If application is for renewal of a license, complete only Items 1 through 7 and indicate new information or changes in the program as requested in Items 8 through 15. Use supplemental sheets where necessary. Item 16 must be completed on all applications. Mail two copies to: Radiation Protection Section, Box 2348, Santa Fe, New Mexico 87501. Upon approval of this application, the applicant requirements contained in the New Mexico Radiation Protection Regulations, Part 3, Licensing and the License is subject to Part 4, Standards for Protection Against Radiation.

 (a) NAME AND STREET ADDRESS OF APPLICANT (Institution, firm, hospital, person, etc.) Bokum Resources Corporation Mining and Milling Division 142 W. Palace Avenue P.O. Box 1833 Santa Fe, New Mexico 87501 	 (b) STREET ADDRESS(ES) AT WHICH A RADIOACTIVE MATERIAL WILL BE USED (If different from 1 (a).) Bokum Resources Corporation Marquez Uranium Mill 1 mile S.E. of Village of Marquez Marquez, New Mexico
Phone (505) 982-1824	Phone Not available until Sept. 1978
2. DEPARTMENT TO USE RADIOACTIVE MATERIAL	 PREVIOUS LICENSE NUMBER(S). (If this is an application for renewal of a license, please indicate and give number.)
Mining and Milling Division	None
 INDIVIDUAL USER(S). (Name and title of individual(s) who will use or directly supervise use of radioactive material. Give training and experience in Items 8 and 9.) 	 5. RADIATION PROTECTION OFFICER (Name of person designated as radiation protection office if other than individual user. Attach resume of his training and experiences as in Items 8 and 9.)
See Sections 5.1 and 5.2 of Supplemental Sheets.	See Section 5.2 of Supplemental Sheets.
	Phone (505) 982-1824

 6. (a) RADIOACTIVE MATERIAL. (Elements and mass number of each.) all natural radioisotopes 	 (b) CHEMICAL AND/OR PHYSICAL FORM AND MAXIMUM NUMBER OF MILLICURIES OF EACH CHEMICAL AND/OR PHYSICAL FORM THAT YOU WILL POSSESS AT ANY ONE TIME. (If sealed source(s), also state name of manufacturer, model number, number of sources and maximum activity per source.)
encountered in the milling	Uranium Bearing Ores12% Natural
of natural uranium	Yellowcake (Sodium or Ammonium Diruanate) -
	70-75% U
	(99.3% U ₂₃₈ 0.7% U ₂₃₅)

7. DESCRIBE PURPOSE FOR WHICH RADIOACTIVE MATERIAL WILL BE USED. (If radioactive material is for "human use," supplement RPS 16A must be completed in lieu of this item. If radioactive material is in the form of a sealed source, include the make and model number of the storage container and/or device in which the source will be stored and/or used.)

Uranium concentrates produced in the proposed mill will be further beneficiated to provide nuclear fuel for nuclear power generators providing electricity for the electric utility industry.

8. INDIVIDUAL USER(S) TRAINING

Complete the following information on the individual user(s) and his training in:

- A) Nuclear physics, atomic structure, and interaction of radiation with matter
- B) Radiation detection instrumentation, calibration, and standardization
- C) Radiation protection, waste disposal, and survey and dosimetric procedures
- D) Radiobiology, including effects of radiation on the human body

Name, Title, Degree(s)	Where Trained	Length of Academic Training in A, B, C, and D	Length of On-the-job Training in A, B, C, and D
See Sections 5.1 and 5.2 supplemental sheets			

RADIOACTIVE MATERIAL LICENSE (Cont'd Page 2)

Item 6 (c) The following sealed sources will be used at the mill site as density gauges: 1. Model ED-8 (7 units) a. Sources Model Numbers: SO-8030125F, SO-8030125-D, SO-8030125-G, SO-8030125-E, SO-8030125-C, SO-8030125-A, SO-8030125-B. Istope - Cs 137 Amount - 150 mCi b. Serial Numbers: 67143 9-78, 67141, 67144, 67142, 67140, 67138, 67139. 2. Model ED-4 (j unit) a. Source Model Number S0-8030125-H Istope - Cs 137 Amount - 50 mCi b. Serial Number: 67285. 3. Model ED-5 (1 unit) a. Source Model Number: SO-8030125-I Istope - Cs 137 Amount - 100 mCi

b. Serial Number: 67061

All of the sealed sources are manufactured by:

Ohmart Corporation 4241 Allendorf Dr. Cincinnati, Ohio 45209



9. EXPERIENCE WITH RADIATION. (Actual use of radioisotopes or equivalent experience.)

Isotope	Maximum Amount	Where Experience Was Gained	Duration of Experience	Type of Use	
See Se	ctions 5.1 and	5.2 of Supplemental	Sheets.		

10. RADIATION DETECTION INSTRUMENTS. (Use supplemental sheets if necessary.)

Туре	Number Available	Radiation Detected	Sensitivity Range (mr/hr)	Window Thickness (mg/cm ²)	U	se (Monitoring, surveying, measuring)	
See of E	Section 4. nvironment	0 of Mill al Report	Radiation	Safety Prog	gram and	Section	6.2

11. METHOD, FREQUENCY, AND STANDARDS USED IN CALIBRATING INSTRUMENTS LISTED ABOVE. See Section 4.0 of Mill Radiation Safety Program and Section 6.2 of Environmental Report.

12. FILM BADGES, DOSIMETERS, AND BIO ASSAY PROCEDURES USED. (For film badges, specify method of calibrating and processing, or name of supplier.) See Section 4.0 of Mill Radiation Safety Program and Section 6.2 of Environmental Report.

FORMATION TO BE SUBMITTED ON ADDITIONAL SHEETS

- 13. FACILITIES AND EQUIPMENT. Describe laboratory facilities and remote handling equipment storage containers, shielding, fume hoods, etc. Explanatory sketch of facility is attached. (Circle answer) Yes
- 14. RADIATION PROTECTION PROGRAM. Describe the radiation protection program including control measures. If application covers sealed sources, submit leak testing procedures where applicable, name, training, and experience of person to perform leak test, and arrangements for performing initial radiation survey, servicing, maintenance and repair of the source.
 - See Mill Radiation Safety Program
- 15. WASTE DISPOSAL. If a commercial waste disposal service is employed, specify name of company. Otherwise, submit detailed description of methods which will be used for disposing of radioactive wastes and estimates of the type and amount of activity involved.

See Sections 3.0 and 5.0 of Environmental Report

CERTIFICATE (This item must be completed by applicant)

16. THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATE ON BEHALF OF THE APPLICANT NAMED IN ITEM 1, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH THE NEW MEXICO RADIATION PROTECTION REGULATIONS, PART 3, LICENSING, AND THAT ALL INFORMATION CONTAINED HEREIN, INCLUDING ANY SUPPLEMENTS ATTACHED HERETO, IS TRUE AND CORRECT TO THE BEST OF OUR KNOWLEDGE AND BELIEF.

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Applicant Named in Item 1 malecher lan

Bokum Resources Corporation

Vice President of Mining & Milling Title of Certifying Official

RPS 16

Page 3





PROPOSED ACTIVITIES

The Applicant, the Mining and Milling Division of Bokum Resources Corporation, with offices in Santa Fe, New Mexico, proposes to construct and operate a 2200 TPD uranium mill on its Marquez property located 35 miles northwest of Albuquerque, New Mexico and 20 miles north of Laguna, New Mexico near the small village of Marquez, New Mexico.

8 The mill, using a sulfuric acid leach-solvent extraction 9 process, will process an average 2200 TPD uranium ore averaging 0.12% U₂O₈ over an expected mill life of twenty years. Mill 10 11 operation is presently scheduled to begin January 1979. In 12 addition to processing Applicant's ore from Applicant's Marguez 13 Mine (located two miles west of the proposed mill) it is anti-14 cipated that ore other than Applicant's will be tolled through 15 the proposed mill operation.

16 The Applicant's Environmental Report which is filed in 17 conjunction with this document contains more specific, detailed 18 and complete descriptions of the proposed document and will be 19 the principal reference for this application. Where said 20 Environmental Report describes more completely the information 21 required in the following sections, reviewer will be referenced 22 to the particular section of the Environmental Report.

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SITE DESCRIPTION

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Applicant's proposed mill facility is briefly and generally described in the following subsections with specific reference to more detailed descriptions within Applicant's Environmental Report.

5 2.1 Geography and Demography

6 2.1.1 Geography

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7 Applicant's proposed mill facility will be located upon the 8 community lands of the Juan Tafoya Land Grant (also known as the Marquez 9 tract) in Sections 32 and 33, Township 13N, Range 4W. This facility 10 will be located 2 miles east of Applicant's mine and approximately 1 mile 11 east of the small village of Marquez, New Mexico. See Section 2.1 of 12 the Environmental Report for further description of the site location 13 and layouc.

14 2.1.2 Demography

15 The proposed mill will be located in a sparsely populated, undevel-16 oped area of Sandoval County. Population statistics, personal incomes, 17 employment, land use and other area demographical characteristics are 18 presented in Section 2.2 of the Environmental Report.

19 2.2 Meteorology

Meteorological conditions for the proposed site are typical of a semi-arid continental climate with an elevation of 6900 feet above sea level. For estimated and projected meteorological conditions of the site, refer to Section 2.7 of the Environmental Report.

24 2.3 Hydrology

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25 2.3.1 Groundwater

Refer to Section 2.6 of the Environmental Report.

1	2.3.2 Surface Water
2	Refer to Section 2.6 of the Environmental Report.
3	2.4 Geology and Seismology
4	2.4.1 Geology
5	Refer to Section 2.4 of the Environmental Report.
6	2.4.2 Seismology
7	Refer to Section 2.5 and Appendix G of Applicant's Environmental
8	Report.
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FACILITY DESIGN AND CONSTRUCTION

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3.1 Mill Process

A quantitative description of the mill process, including flow
diagrams, is presented in the Environmental Report, Section 3.2.
Sources of mill wastes and effluents are described in the Environmental
Report, Section 3.3.

7 3.2 Major Equipment

8 Major items of process equipment and their specifications are
9 described in the Environmental Report, Section 3.2.

10 3.3 Instrumentation

11 Instrumentation for both safety and control of mill operations 12 will be installed in the respective mill areas where the grinding, leaching, thickening, solvent extraction and precipitation processes 13 will be conducted. The process variables monitored will include pH, 14 temperature, pressure, conductivity, density, viscosity, turbidicy, 15 torque, speed, power and quantity. Density gauges will employ less 16 than 200 mCi Cs-137 sources stored in shielded containers equipped with 17 rotary shutters. There will be a total of nine of these density gauges. 18 Three will be located in Pump House No. 1 and four will be located in 19 Pump House No. 2, with one unit being located in the Grinding Building 20 and one unit in the Leaching Area. 21

22 Radiation safety instrumentation is discussed in Section 4.0 of 23 the Mill Radiation Safety Program.

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4.0 WASTE MANAGEMENT

2 4.1 Gaseous

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All sources of gaseous effluents from Applicant's proposed mill
are discussed in the Environmental Report, Sections 3.3 and 5.3.
Control of mill wastes and effluents are discussed in the Environmental
Report, Section 3.4.

7 4.2 Solid and Liquid

All sources of solid and liquid effluents from the Applicant's proposed mill are discussed in the Environmental Report, Sections 3.3 and 3.5. Control of mill wastes is discussed in the Environmental Report, Section 3.4; accident evaluations in the Environmental Report, Section 7.0; reclamation and restoration in the Environmental Report, Section 9.0; and water discharge permits in the Environmental Report, Section 12.0.

15 4.3 Contaminated Equipment

As specified in Section 4-300 of the New Mexico EIA "Regulations for Governing the Health and Environmental Aspects of Radiation" no waste generated or used on-site that is contaminated with radioactivity will be disposed of unless transferred to an authorized recipient or by specific state authorization.

Contaminated waste will be disposed of by one of two methods: (1) 21 by cleaning the solid waste to below release criteria specified by ANSI 22 Standard N328-197, "Control of Radioactive Surface Contamination of 23 Materials, Equipment and Facilities to be Released for Uncontrolled 24 Use;" or, (2) by packaging and shipping the waste to an authorized com-25 mercial repository such as the facility operated by Nuclear Engineering 26 Company near Beatty, Nevada or the proposed Chem-Nuclear disposal site 27 near Cimarron, New Mexico. 28

Plant operating procedures will require that no articles suspected of being contaminated will be released from the site without authorization of the Environmental Health and Safety Manager and/or the Mill Superintendent. Prior to release from the site, these individuals will confirm by actual measurement that the item is not contaminated to levels exceeding the allowable limits prescribed by the aforementioned ANSI standard.

No component will leave the site with visual contamination of yellowcake in compliance with the philosophy of maintaining exposures as low as reasonably achievable. Prior to release, each component will be surveyed with a beta/gamma sensitive probe (Eberline HP-210, or equivalent) an alpha sensitive probe (Eberline AC-3, or equivalent), and dry swiped at suspected areas of contamination. The swipe is then analyzed for gross alpha radiation by an Eberline SAC-4 or equivalent. Coating of the component by paint or sealer to prevent the detection of activity by the above method will be prohibited.

OPERATIONS

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3 5.1 Corporate Organization

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Applicant's corporate organization is shown on Figure 5.1 A. The Applicant's mine and proposed mill operations will be separate but interdependent divisions having to report to the Vice-President of the Mining and Milling Division. The Vice-President will have full and ultimate responsibility for all phases concerning the mining division and the milling division.

10 The next level of management will be the Mill Superintendent and 11 the Environmental Health and Safety Manager. The Mill Superintendent, 12 reporting directly to the Vice-President, will have full responsibility 13 and authority for the operation of the mill and all related activities 14 including development, approval *end* adherence to operating procedures.

The Environmental Health and Safety Manager will report directly to the Vice-President and will serve in an advisory capacity to the Mill Superintendent, General Foreman and other mill personnel. He will be responsible for carrying out environmental surveys, instituting experimental planting programs, suggesting, improving and developing mill operating health and safety procedures.

The next level of supervision will be the level of positions under the Mill Superintendent. These will consist of the Chief Metallurgist, Chief Chemist, General Foreman, Maintenance Superintendent, and administrative staff.

The last level will consist of shift foremen who will report to and be responsible to the General Mill Foreman and the Maintenance Superintendent for adherence by workers under their supervision of established operating and maintenance procedures.

· · · · · · · · · · · · · · · · · · ·		GENERAL MILL FOREMAN		- MILL FOREMAN (SWING SHIFT)	- MILL FOREMAN (GRAVEYARD SHIFT)	 - SURFACE FOREMAN	
			MAINTENANCE FOREMAN				
VICE PRESIDENT MINING & MILING DIVISION	MILL SUPERINIENDENT	MAINTENANCE SUPERINTENDENT	ELECTRICAL FOREMAN				
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FIGURE 5.1 A - MILL MANAGEMENT STRUCTURE

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The Chief Chemist will be responsible for the operation of the
 plant laboratory. The Chief Metallurgist will be responsible for the
 metallurgical operation of the mill and may act as an assistant to the
 Mill Superintendent.

5 5.2 Qualifications

6 The following is a summary of the qualifications, training and 7 experience of the personnel who will be directly responsible for the 8 development, conduction and administration of the radiation safety 9 program.

10 Laurence Storm - Mill Superintendent. Graduated in 1952 from the South 11 Australia School of Mines with a degree in Primary Metallurgy and has over 12 25 years experience in the processing of a wide variety of minerals of 13 which 10 years have been spent in the uranium industry; Employed initially 14 as Assistant Metallurgical Engineer and subsequently as Senior Metallurgi-15 cal Engineer at Radium Hill, South Australia from 1954 to 1959; Employed 16 by Ranger Uranium Mines from 1972 through 1977 as Chief Metallurgist/Mill 17 Superintendent-Elect. During this period formulated the basic data and 18 developed the model for radiation exposures from mine and mill operations; 19 Attended several seminars on Radiation and Safety in the Uranium Mining and Milling Industry conducted by the Australian Atomic Energy Commission 20 (AAEC), Lucas Height, New South Wales and the Australian Minerals Found-21 ation (AMF), Adelaide, South Australia during the period of 1972-1977; 22 Was the Ranger Uranium Mines representative on the Committee For Air 23 Pollution held under the auspices of the Australian Minerals Industrial 24 Committee (AMIC) until leaving the company in December, 1977 to join 25 Bokum Resources Corporation; Accredited as a United Nations Technical 26 Expert in the Processing of Uranium Ores by invitation in 1974. 27

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1 Raymond R. Waggoner - Environmental Health and Safety Manager. Mr. Waggoner 2 earned a Bachelor of Science degree in Geology from California State University 3 at Los Angeles in 1972 and a Master of Science degree in Geology from McKay 4 School of Mines, University of Nevada, Reno, in 1974. He has worked in the 5 Mining, Petroleum and Geotechnical Consulting fields. He has served as both 6 Mine Manager and Mill Superintendent with Nevada based mining operations. In 7 that capacity he was responsible for development of operational safety procedures 8 in conformance with both the Office of Occupational Safety and Health Adminis-9 tration and the Mine Safety and Health Administration. He has participated in 10 the geotechnical review of nuclear facility siting evaluations and the review 11 of specific phases of nuclear power plant design. He has also participated 12 in numerous geotechnical studies concerned with Liquified Natural Gas plant 13 siting, oil/gas pipeline routing, transmission line routing and fault interpre-14 tation studies.

15 Richard R. LeClair - Radiation and Environmental Safety Officer. Mr. LeClair 16 earned a Bachelor of Science degree in Microbiology from the University of 17 Wyoming in 1974. He has also completed studies in Immunology, Clinical 18 Hematology, Medical Physiology and Human Anatomy. He has worked as both 19 an assistant R.S.O. and as the Radiation Safety Officer of a uranium mining 20 and milling operation in Wyoming. In his capacity as Radiation Safety Officer 21 he has participated in all phases of environmental monitoring. He has also 22 assisted in developing bioassay programs to facilitate the analysis and 23 computation of employee radiation exposure.

24 5.3 Training

Refer to Section 4.5 of Mill Radiation Safety Program.

26 5.4 Security

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The mill site and tailings-evaporation pond area will be fenced where
 necessary to restrict access by the general public, wildlife and unauthorized

personnel. The fencing will be posted with "No Trespassing-Violators Will
 be Prosecuted" signs. One gate manned by a guard twenty-four hours a day
 will provide access to the mill site for the ore trucks, service vehicles
 and operating employees. This gate will be located between the Gate-Change
 House and the Truck Scale House.

6 Visitors to the mill will be admitted through the Office, only by 7 permission of a supervisory employee. Each visitor will be logged in and 8 out using a visitor's register and provided an identification badge prior 9 to being escorted to the proper area. Visitors who have mill-oriented work 10 to perform in the operating areas will be instructed on security and safety 11 procedures prior to being allowed to perform work unescorted within the 12 confines of the mill.

13 The tailings disposal area will be provided a gate which will normally 14 be closed and locked. Supervisory personnel along with the guards and the 15 person directly responsible for the tailings disposal area will have keys to 16 this gate lock.

17 Fencing will be checked daily by guards or other responsible employees18 to insure its integrity.

19 5.5 Radiation Safety

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See Section 4.0 of Mill Radiation Safety Program.

6.0 ACCIDENTS

A discussion of potential mill accidents and the environmental effects of such accidents is presented in Section 7.0 of the Environmental Report.

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5 The Environmental Health and Safety Manager in conjunction with 6 the Mill Superintendent will establish emergency procedures that 7 anticipate, insofar as possible, emergencies that may arise. Emergency 8 plans will cover, as a minimum, the following situations: chemical 9 spills, fire, yellowcake transportation incident, tailings release, 10 suspected yellowcake release, and personnel injury.

Emergency procedures will consider personnel safety a prime concern. Attention will also be given to equipment safety, prompt corrective action, assessment and correction of offsite condition and notification of management and regulatory authorities as required.

The Environmental Health and Safety Manager will be responsible for:

- (1) Developing and issuing emergency procedures.
- (2) Procuring and periodically testing emergency equipment.
- (3) Developing emergency training programs for his staff, for all mill personnel, and for emergency action teams, including rescue and fire-fighting teams.
 - (4) Assessing onsite and offsite conditions following emergencies.
- (5) Coordinating assessment of the cause and effectiveness of corrective actions following emergencies.

(6) Notifying corporate and regulatory personnel as required.

The Mill Superintendent will be responsible for:

- (1) Insuring mill personnel receive emergency training.
- (2) Assigning work crews for emergencies.
- (3) Repairing and/or maintaining emergency equipment.

(4) Maintaining a current file of emergency procedures for use by supervisory personnel.

QUALITY ASSURANCE

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Applicant's quality assurance program will cover all phases of mill engineering and design, construction, and operation to insure safety, reliability and economy of operation. The Vice-President of Mining and Milling or his designated representative will have the lead responsibility for the quality assurance program at the mill.

Engineering and Design

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9 Applicant has employed a metallurgical consultant to formulate the 10 process design criteria for Applicant's proposed mill and assure that the 11 engineering design meets the design criteria. Applicant has employed a 12 design engineering and construction firm to design and construct the 13 mill using the process design criteria supplied by the metallurgical 14 consultant.

All phases of design will be in conformance with accepted engineering practices, building codes, and stability standards based upon seismic and meteorological conditions expected at the proposed site. Design criteria will provide for controlling environmental releases to the lowest reasonable level.

Construction

Rigid specifications for all construction materials and procedures 21 will be prepared by the prime contractor to insure that mill construction 22 will conform to design criteria. On-site inspections by qualified engine-23 ers supplemented with either independent or vendor certified testing of 24 crucial equipment will assure that construction meets specifications. 25 The Vice-President of Mining and Milling or his designated representative 26 prior to accepting the completed mill facility and releasing the con-27 struction firm may select and direct qualified individuals to make 28

1 inspections and checks to insure that the final installation meets the 2 design criteria and specifications.



Operation

Mill operators and employees will be trained both in the perform-ance of their duties and in radiation protection safety. For more detailed information on operating procedures, training and radiation safety procedures, refer to the Mill Radiation Safety Program. A 13dio-tion monitoring program will be instituted by Applicant to assure that workers and the general public are not exposed to radioactive materials in excess of exposure limits This program is described in Section 4.0 of the Mill Radiation Safety Program. An environmental monitoring pro-gram will be provided to determine the environmental impact of the proposed mill upon the surrounding environs. This program is presented in Section 6.0 of the Environmental Report.



ADDENDA

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The following letters of transmittal constitute revisions and additions made to the application since the original submittal of the application. Major revisions and additions have been inserted into the appropriate sections of the application.