



# Texas Department of Health

Robert Bernstein, M.D., F.A.C.P.  
Commissioner

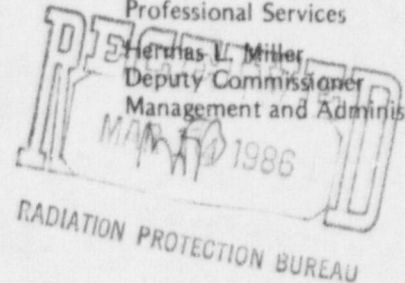
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Robert A. MacLean, M.D.  
Deputy Commissioner  
Professional Services

Herbert L. Miller  
Deputy Commissioner  
Management and Administration

March 10, 1986

Radiation Control  
(512) 835-7000



U. S. Department of Transportation  
Office of Hazardous Materials Regulation  
Room 8100  
400 Seventh Street  
Washington, D. C. 20590

Attn: Exemption Branch, Mr. Wendell Carriker

Dear Sir:

Enclosed you will find an amendment to Chevron Resources Company's Radioactive Material License No. 8-2402. The amendment authorizes the construction and use of a railcar unloading facility to transfer uranium ore received from Grants, New Mexico to its Panna Maria mill near Hobson, Texas.

Regarding this amendment, we understand that Chevron has applied to your agency for an exemption from 49 CFR, Subchapter "C", Part 173, Subpart I, Section 173.425, Subparagraph (C) which requires closed transport vehicles for low specific activity materials. We have reviewed our regulatory authority contained in our Texas Regulations for Control of Radiation (TRCR) and find that no specific regulatory action is needed from the Texas Department of Health regarding this transport. TRCR 41.21(d) issues a general license to mine, transport, and transfer ores containing source material without regard to quantity.

However, we have reviewed the proposal and find that we concur with the State of New Mexico in its letter of February 20, 1986, to you. The NALCO Dust-Ban 8803 appears to be an acceptable dust binder. The proper use of the dust binder coupled with the type of railroad car to be used, loading methodology and the selected route make it appear that this activity will have no unfavorable impact on the public health and safety or the environment.

We request that you keep us informed as to your final actions on this matter. If you have any questions, please contact me.

Sincerely,

*Edgar D. Bailey*  
Edgar D. Bailey, P.E., C.H.P., Director  
Division of Licensing, Registration  
and Standards  
Bureau of Radiation Control

cc: Jay Reynolds, Manager  
Panna Maria Mill  
P. O. Box 1000  
Hobson, Texas 78117-1000

Michael F. Brown, Acting Bureau Chief  
Radiation Protection Bureau  
Environment Improvement Division  
P. O. Box 968  
Santa Fe, New Mexico 87504-0968

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TEXAS DEPARTMENT OF HEALTH  
RADIOACTIVE MATERIAL LICENSE

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Supplementary Sheet

LICENSE NUMBER	AMENDMENT NUMBER
9-2402	13

Chevron Resources Company  
Agent for Chevron U.S.A. Inc.  
Attn: Mr. Mike Manka  
P. O. Box 1000  
Hobson, Texas 78117-1000

In accordance with letters dated September 27 and December 4, 1985; January 23 and February 25, 1986, signed by Mike D. Manka, License No. 9-2402 is hereby amended as follows:

To change Conditions 9, 10 and 18 to read:

9. a. Radioactive material shall only be mined, processed, and stored at the licensee's Panna Maria project located in Karnes County approximately 3 miles northwest of Hobson, Texas.
- b. The licensee is authorized to construct and operate a railcar unloading facility adjacent to the Southern Pacific Railroad right-of-way in order to transfer incoming uranium ore to the Panna Maria facility. The facility shall be located on FM 81 approximately 2.75 miles west of the licensee's Panna Maria mill and 3 miles southeast of Falls City, Texas in Karnes County.
10. The licensee shall comply with the provisions of Parts 11, 12, 13, 21, 22, 41 and 43 of the Texas Regulations for Control of Radiation (TRCR).
18. Except as specifically provided otherwise by this license, the licensee shall possess and use the radioactive material authorized by this license in accordance with statements, representations, and procedures contained in the following:

application dated June 20 and August 30, 1977, letters dated September 19, October 7 and October 20, 1977; June 7 and November 6, 1978; February 12 and May 30, 1979; June 16, 1980; May 8, 1981; January 23, September 27 and December 4, 1985; and January 23 and February 25, 1986.

The Texas Regulations for Control of Radiation shall prevail over statements contained in the above documents unless such statements are more restrictive than the regulations.

CONDITIONS CONTINUED ON PAGE 2



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RADIOACTIVE MATERIAL LICENSE

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Supplementary Sheet

LICENSE NUMBER	AMENDMENT NUMBER
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CONDITIONS CONTINUED

To add Conditions 23, 24, 25, 26, 27, and 28 to read:

23. The licensee must obtain all permits and licenses required by Federal, State and local authorities prior to commencing operations. Copies of all such documents and amendments thereto shall be provided to the Agency within 30 days of their receipt.
24. The licensee shall obtain any Texas Air Control Board (TACB) permit or authorization prior to beginning operations. The licensee shall notify the Agency of any proposed modifications to any TACB permit or authorization and of its final approval.
25. The licensee shall conduct the following environmental monitoring program:

Preoperational:

Representative soil samples (0-15 cm blended composite) will be collected and analyzed for natural uranium, Ra-226, Th-230, and Pb-210 prior to initiation of operations at the site. Samples shall be collected at the unloading location, representative traffic area, drainage, and runoff accumulation areas.

Operational:

<u>Type</u>	<u>Location</u>	<u>Frequency</u>	<u>Analysis</u>
TLD	Nearest downwind residence (Trial Residence)	Quarterly Exchange	Gamma exposure
	Boundary fence of the Trial property adjacent to FM 81	Quarterly Exchange	Gamma exposure

CONDITIONS CONTINUED ON PAGE 3





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Supplementary Sheet

LICENSE NUMBER	AMENDMENT NUMBER
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CONDITIONS CONTINUED

Passive Radon Monitoring	Same as TLD	Quarterly Exchange	Rn-222
High volume air samples	Same as TLD	Weekly grab (composited monthly) during the first month of transfer operations and then monthly grab (composited quarterly) thereafter	Natural uranium, Th-230, Ra-226, Pb-210

26. a. Records of all sampling records and analyses, radioactive material transfers and disposals, program audits, inspections and surveys, and other records required by the TRCR and this license shall be kept on site for inspection.
- b. The licensee shall submit to the Agency within 60 days after January 1 and July 1 of each year, a report specifying the quantity of each principal radionuclide released to unrestricted areas in liquid and in gaseous effluents (including particulates) during the previous six months of operations.
27. Financial security shall be maintained on the facility (including the railcar unloading facility) until final release by the Agency.
28. If blowing dust becomes evident during the railcar unloading and the ore truck loading and hauling phases, the licensee shall take appropriate measures to suppress it.

WDS:ps

FOR THE TEXAS DEPARTMENT OF HEALTH

*Edgar D. Bailey*

Edgar D. Bailey, P.E., C.H.P., Director  
Division of Licensing, Registration  
and Standards

Date March 10, 1986