



COGEMA
Mining, Inc.

February 4, 2000

**LICENSE SUA-1341
DOCKET NO. 40-8502**

Mr. John J. Surmeier, Acting Chief
Uranium Recovery Branch
Division of Waste Management
Mail Stop T7J9
Nuclear Regulatory Commission
Washington, D.C. 20555

RE: Annual SERP Summary for 1999

Dear Mr. Surmeier:

Section 9.4(D) of COGEMA Mining, Inc.'s Source Material License SUA-134, requires COGEMA to furnish an annual report summarizing the safety and environmental evaluations made by the Safety and Environmental Review Panel (SERP). The annual report shall describe any changes, tests, or experiments approved by the SERP and include any changed pages to the Operations Plan and Reclamation Plan of the approved license application.

Accordingly, COGEMA furnishes the attached annual report to meet this requirement. Note that there were no changed pages to the Operations Plan and Reclamation Plan of the approved license application.

Please contact me if you have any questions regarding this report.

Sincerely,

John Vaselin
Radiation Safety Officer

cc: NRC: Division Director, Arlington, TX
COGEMA: T. Hardgrove, C. Toal, W. Heili

COGEMA Mining, Inc.
Performance-Based License Section 9.4 (D), SUA-1341
1999 Annual SERP Summary Report

COGEMA's Safety And Environmental Review Panel (SERP) completed two safety and environmental reviews during 1999, as per License Section 9.4 (C). The purpose of the reviews were to determine if certain proposed additions and/or changes met the requirements of License Sections 9.4 (A) and (B), and could be approved.

The two approved reviews did not result in any changes of the facility, process, or procedures presented in the approved license application, and did not involve any tests or experiments. No changed pages to the Operations Plan and Reclamation Plan of the approved license application resulted from the reviews, and no license amendment applications were required. A summary of both safety and environmental reviews are given below.

Safety and Environmental Review No. 99-1

The SERP evaluated the standby status of the mine units which are in restoration, to determine if a reduction of sampling frequency of the monitor wells was possible. The SERP Noted that License Section 10.16 states that "The licensee shall conduct groundwater restoration and post-restoration monitoring as described in Section 6.1 of the approved license application." The monitor well sampling schedule given in Table 6.2 of that section, lists a monthly frequency sampling for all monitor wells during the restoration phase.

The SERP determined that there is no degradation in the essential safety or environmental commitments, of the approved license application, by the proposed action. Therefore, the SERP approved the decrease in sampling frequency from bi-weekly to monthly (as listed in Table 6.2 of the approved license application), for monitor wells of partially restored wellfields which are on standby status and awaiting further restoration.

Safety and Environmental Review No. 99-2

The SERP evaluated the need to revise health physics procedure SOP HP-2, Gamma Exposure Rate Survey. The need for the revision became evident during a recent NRC inspection, which noted that a narrow but accessible aisle in the drum storage area was not surveyed for gamma exposure. The aisle center had an external exposure which met the definition of a "Radiation Area" as per 10 CFR 20.1003, but was not posted. The aisle had not been surveyed because it did not meet the procedure definition for survey areas, which stated "readily accessible to workers".

The SERP determined that while there appeared to be no compromise of the essential safety or environmental commitments by the current procedure, a more conservative and consistent definition of a gamma exposure survey area was needed. Therefore, the SERP decided to use the exact wording of the NRC regulations and the approved license application by deleting the word "readily" from the procedure which defines accessible gamma exposure survey areas.