



STATE OF WASHINGTON

DEPARTMENT OF HEALTH

OFFICE OF RADIATION PROTECTION

243 Israel Road SE • PO Box 47827 • Olympia, Washington 98504-7827

TDD Relay Service: 1-800-833-6384

March 7, 2019

TO: Interested Parties, Dawn Mining Company Closure

FROM: Kristen Schwab, Supervisor, Waste Management Section *KS*

SUBJECT: Dawn Mining Company (DMC) Uranium Mill License Amended to Reflect the Department's approval for DMC to Terminate Occupational Radiation Exposure Monitoring at the Millsite

This memorandum is to inform you that the Department of Health (the Department) has amended Dawn Mining Company's (DMC) State of Washington Radioactive Materials License. I have attached the following to this memorandum:

- Amendment 31 to DMC's Washington State Radioactive Materials License WN-I043-2; and,
- An addendum to existing State Environmental Policy Act (SEPA) documents for closure of the DMC Millsite.

DMC's Request to Amend Radioactive Materials License WN-I043-2

DMC submitted a letter request to the Department of Health, Office of Radiation Protection (the Department) on November 26, 2018 to amend their state of Washington Radioactive Materials License to reflect DMC's proposed termination of occupational radiation exposure monitoring for Millsite workers. Following staff review, the Department sent a letter response to DMC dated December 26, 2018 approving DMC's request for amendment.

Conclusion

DMC's amendment request complies with applicable radiation protection laws and regulations contained in RCW 70.98 and 246-252 WAC. There are no changes to the Radioactive Materials License that have not already been evaluated under existing SEPA

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documents. Amendment 31 is attached and will be posted on the Department's website at:
<http://www.doh.wa.gov/CommunityandEnvironment/Radiation/WasteManagement>.

Anyone who is not on the Department's list for receiving these mailings related to closure of the DMC Millsite may be added to that list, or may request copies of these attachments, by contacting Kristen Schwab at (360) 236-3241 or Kristen.Schwab@doh.wa.gov at DOH Office of Radiation Protection, P.O. Box 47827, Olympia, WA 98504-7827.

Attachments: WN-I043-2, Amendment 31
Addendum to Existing Environmental Documents, March 2019

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Radioactive Materials License



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License Number: WN-I043-2
Amendment No. 31

DAWN MINING COMPANY, LLC
5326 Uranium City Road
Ford, Washington 99013

Attention: William Lyle
Vice-President & General Manager

In accordance with the amendment request information referenced in License Condition 42.F, Radioactive Materials License Number WN-I043-2 is amended as follows:

License Conditions 23.A, 23.B, 23.F, and 24 are deleted:

23. The licensee shall perform an annual ALARA audit of the radiation safety program which shall be led by the RSO. This audit must be completed and submitted to the department by May 31 of each year. The audit team should include the General Manager. The report shall include summaries of the analytical results of the radiological surveys and any recommendations to further reduce personnel exposures or environmental releases of uranium or radon and radon progeny.

In order to evaluate the ALARA objective, the licensee shall, at a minimum, review the following records:

- A. **Reserved.**
- B. **Reserved.**
- C. Safety meeting minutes, attendance records, and training program records.
- D. Any radiological inspection reports required by this license.
- E. Radiological survey and monitoring data, as well as environmental radiological effluent and monitoring data.
- F. **Reserved.**
- G. Reports of overexposure submitted to the department.

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License Number: WN-I043-2
Amendment No. 31

24. **Reserved.**

License Conditions 26.A and 26.C are deleted, and License Condition 26 is amended to read:

26. The licensee shall monitor the following locations to demonstrate compliance with WAC 246-221. The licensee shall:

A. **Reserved.**

B. Monitor the site perimeter for direct gamma radiation dose, radon concentration, and radionuclide concentrations in airborne particulates, at locations and frequencies specified in the Site-Wide Sampling and Analysis Plan described in License Condition 30B.

C. **Reserved.**

License Condition 42.F is added:

42.F Letter from the department to DMC dated December 26, 2018, RE: termination of the requirement for occupational radiological air monitoring (DMOP-05 Air Monitoring and DMOP-11 Special Work Permits); letter and attachment from DMC to the department dated November 26, 2018, RE: request for termination of occupational radiological air monitoring; letter from the department to DMC dated July 10, 2018, RE: termination of the requirement for radon monitoring in routinely occupied structures (DMOP-05 Air Monitoring); letter from the department to DMC dated July 25, 2017, RE: termination of the requirement for internal and external radiological exposure monitoring, and respiratory protection (DMOP-03 Internal Exposure Monitoring, DMOP-07 External Dosimetry and DMOP-08 Respiratory Protection).

FOR THE STATE OF WASHINGTON DEPARTMENT OF HEALTH

Date: March 7, 2019

By: *Kristen Schwab*
Kristen Schwab, Supervisor
Waste Management Section

Dawn Mining Company Uranium Millsite

ADDENDUM TO EXISTING ENVIRONMENTAL DOCUMENTS

March 2019

Washington State Department of Health

Office of Radiation Protection

This document is an addendum to the following existing environmental documents:

- **DMC Millsite:**
 - 1991 Final Environmental Impact Statement, Closure of the Dawn Mining Company Uranium Millsite
 - 1994 Supplemental Final Environmental Impact Statement for Millsite Closure
 - 2000 Addendum to Existing Environmental Documents
 - 2009 Addendum to Existing Environmental Documents
 - 2011 Addendum to Existing Environmental Documents
 - 2014 Addendum to Existing Environmental Documents
 - March 2017 Addendum to Existing Environmental Documents
 - December 2017 Addendum to Existing Environmental Documents

Dawn Mining Company (DMC) submitted a letter request to Department of Health, Office of Radiation Protection (the Department) on November 26, 2018 to amend their Radioactive Materials License WN-I043-2 to reflect DMC's proposed termination of occupational radiation exposure monitoring for Millsite workers. Following staff review, the Department sent a letter response to DMC dated December 26, 2018 approving DMC's request for amendment.

Changes to DMC's License in the 2017 License Amendment

After the Department's review of DMC's license amendment request and review of occupational radiation exposure monitoring results for Millsite workers, the Department determined that the amended license would include the following update:

- License Conditions 23.A, 23.B and 23.F will be removed. The Department has approved DMC's proposed termination of occupational radiation exposure monitoring. Therefore, the Department will no longer require DMC to implement procedures and review records associated with occupational radiation exposure monitoring. This includes internal exposure monitoring, external dosimetry, respiratory protection and breathing zone monitoring for non-routine work activities. The Department's approval is based on assessment of DMC's past occupational radiation exposure monitoring, which demonstrates that workers involved in ongoing and anticipated future site decommissioning are not likely to receive greater than 10% of the occupational dose limit

annually; thus, monitoring is no longer required under WAC 246-221-090 or WAC 246-221-100.

- License Condition 24 will be removed. This condition required DMC to maintain a bioassay program, which is a form of internal exposure monitoring.
- License Conditions 26.A and 26.C will be removed. The Department approved DMC's proposed termination of radon monitoring in routinely occupied Millsite structures. With demolition of the administration building in 2017, there are no longer any permanent occupied structures at the Millsite; the new administration building is a mobile unit. The Department reviewed DMC's Millsite indoor radon monitoring data for 2000 through 2017 and concluded that radon levels are consistent with indoor background radon in Stevens County, meaning that the radiation exposure to workers as a result of radon and radon decay products in Millsite buildings is indistinguishable from background. In addition, the Department reviewed DMC's lapel sampling (also known as breathing zone) data for 2015 through 2018 and concluded that ongoing and future Millsite decommissioning activities do not warrant personnel lapel sampling per WAC 246-221-090 and WAC 246-221-100. License Condition 26 will maintain requirements for DMC to monitor the site perimeter for radiation dose, radon and radionuclide concentrations in airborne particulates, at locations and frequencies specified in a Department approved Site-wide Sampling and Analysis plan.
- License Condition 42.F will be added. This condition provides reference to DMC's amendment request and supporting documentation.

State Environmental Policy Act

In addition to reviewing the information provided in DMC's license amendment request, the Department's review must also consider whether, under the State Environmental Policy Act (SEPA), amendment of DMC's license requires changes to DMC's license that are substantial and/or involve new information indicating probable significant adverse environmental impacts not adequately evaluated in the existing environmental documents.

Conclusion

The amended license will update DMC's radioactive materials license conditions to reflect the Department's approval for DMC to cease occupational radiation exposure monitoring. The Department has determined that Dawn Mining Company's license amendment meets all applicable requirements. In addition, DMC's license amendment does not involve substantial changes or new information indicating probable significant adverse environmental impacts that have not already been adequately evaluated in existing environmental documents.