



**COGEMA**  
Mining, Inc.

March 1, 2001

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

Mr. Phillip Ting, Chief  
Fuel Cycle Licensing Branch, FCSS  
c/o Document Control Desk  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

**RE: Monitor Well Sampling Problems During Groundwater Sweep**

Dear Mr. Ting:

This letter serves as a follow-up to the E-mail from Elaine Brummet to Donna Wichers on February 23, concerning the lack of groundwater available for sampling certain ore zone monitor wells. The wells are located around the perimeter of Mine Unit 5 at the Christensen Ranch Project, which is currently undergoing the groundwater sweep phase of restoration. Since the recovery flow was increased for Mine Unit 5 in July, 2000, the water levels have dropped as much as 129 feet in these monitor wells. In some cases the water levels have dropped below the pump setting and into the open hole of the wells. Setting the pumps deeper is not practical because they can become stuck or damaged in the open hole. Therefore, we are forced to pull the pumps and use a bailing system to obtain samples at depths down to 500 feet. This sampling method is difficult to conduct and doesn't provide a representative sample of the surrounding formation.

Table 5.2.5 in the License Renewal Application lists downhole submersible pumps as the method for sample collection from monitor wells. Since this is not always possible during groundwater sweep, we request authorization to temporarily suspend sampling perimeter ore zone monitor wells whenever their water levels drop below the maximum depth for pump setting. We will continue measuring water level depths in these wells on a monthly basis to determine when pumped samples can again be obtained. Currently in Mine Unit 5, there are 8 out of a total of 53 perimeter ore zone monitor wells that cannot be pumped sampled.

Note that groundwater sweep for Mine Unit 5 is scheduled for completion in May 2001. Therefore, pump sampling of all monitor wells in Mine Unit 5 should be possible in 3-5 months.

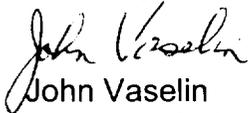
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Mine Unit 6 is scheduled for groundwater sweep through May of 2002. As the recovery flow from Mine Unit 6 is increased, it is likely that the water level depths in some of its perimeter ore zone wells will also drop into the open holes, requiring a suspension of sampling.

With the extreme drop in water levels created during groundwater sweep, the groundwater gradient is obviously towards the wellfields and excursions to the perimeter ore zone monitor wells are highly unlikely.

In consideration of the above information, we are requesting the NRC's and the WDEQ's approval of the proposed temporary suspension of sampling for select monitor wells as outlined above.

Sincerely,



John Vaselin  
Radiation Safety Officer

cc: Donna Wichers - COGEMA