COGEMA
Mining, Inc.

September 17, 2001

LICENSE SUA-1341
DOCKET NO. 40-8502

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

RE: Request to Amend License Section 10.5

Dear Mr. Leach:

License Section 10.5 authorizes yellowcake production from restoration fluids with a limit for yellowcake production not to exceed 30,000 pounds annually. This limit was based on previous estimates of uranium recovery grade during restoration. As you are aware, uranium is recovered during groundwater restoration to enhance the groundwater cleanup process. Currently, restoration uranium recovery grades are higher than originally anticipated. As a result, COGEMA will exceed this limit in October and will produce up to 38,500 pounds of yellowcake during 2001. During 2002 and 2003, it is now estimated that restoration uranium recovery will be nearly 40,000 pounds per year but will decrease significantly in 2004 with the completion of groundwater restoration. Accordingly, COGEMA requests the NRC to amend License SUA-1341 to allow uranium recovery from restoration to be increased to a maximum of 50,000 pounds of yellowcake annually.

A 20,000 pound increase of annual restoration production will not have any measurable affect on radiological effluents or exposures. Yellowcake production peaked in 1996 and has decreased each year since. The following table lists the annual production since 1996 along with employee and public doses, and the stack emissions test averages.

Year	Yellowcake Production	Maximum Employee TEDE Dose	Brubaker Ranch TEDE Dose	Stack Tests Avg.Total Particulates
1996	734,887 lbs.	172 mrem	1.31 mrem	0.042 lbs/hr
1997	599,728 lbs.	157 mrem	1.25 mrem	0.061 lbs/hr
1998	339,463 lbs.	175 mrem	1.69 mrem	0.060lbs/hr
1999	184,911 lbs.	183 mrem	1.17 mrem	0.042 lbs/hr
2000	63,381 lbs.	133 mrem	0.79 mrem	0.052 lbs/hr
Limit		5,000 mrem	100 mrem	0.30 lbs/hr

NMSS/Public

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Note that the employee and Brubaker ranch TEDE doses were well below their limits, with the lowest doses assigned in 2000. The year 2000 also had the lowest production (63,381 lbs.) which is close to the new proposed limit of 50,000 pounds.

Operation of the dryer at the Irigaray Project is the only potentially significant source for radiation exposure. However, the dryer operated for one month during 2000 and it is anticipated to operate only 2-3 weeks during 2001, 2002 and 2003. Thus the employee and public doses are not expected to change significantly during 2001 through 2003 from those of 2000. Note that the stack emissions test annual averages were consistantly between 14 and 20% of the limit. Since the dryer scrubber must be operated within the limits of the DEQ permit, future emissions from the stack should remain near or within this range.

Your assistance with this license amendment request is appreciated. Please contact me if you have any questions regarding this request.

Sincerely,

John Vaselin

John Vaselin
Radiation Safety Officer

cc: Region IV Branch Chief/NRC, Arlington, TX
Donna Wichers/COGEMA
Wayne Heili/COGEMA

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