



The State
of Wyoming



Department of Environmental Quality

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February 4, 2003

Mr. John Vasein
COGEMA Mining, Inc.
P. O. Box 730
Mills, WY 82644

RE: NonSignificant Revision Application, TFN 3 3/389, Permit No. 478

DOCKET: 40-8502

Dear Mr. Vasein:

Attached is a memo containing comments from staff reviews of your proposed changes. As noted in the memo, we have found all your corrections and responses acceptable and will recommend approval of this NonSignificant Revision to the Administrator.

Please feel free to call if you have any questions

Sincerely,

Glenn Mooney
Senior Geologist

\gm

Attachment

cc: Cheyenne File w/attach.
NRC - MD w/attach.

478nsrerv3.3gm

NMISSO1

*02-04-03
JK*

MEMORANDUM

TO: File, COGEMA's Mining Inc.'s Irigaray - Christensen Ranch ISL Operation, NonSignificant Revision Application, TFN 3 3/389

FROM: Glenn Mooney, Senior Geologist *GM*

DATE: February 4, 2003

SUBJECT: Third Combined Review

Introduction

A NonSignificant Revision (NSR) Application was received from COGEMA Mining Inc. (COGEMA) on June 22, 2001, under cover of John Vasein's letter of June 19, 2001. Several replacement pages were received on June 29, 2001, under cover of Mr. Vasein's letter dated June 27, 2001. Review comments were then sent to Mr. Vasein under cover of my letter of August 14, 2001. Additional comments were included in my letter of May 16, 2002, following a May 10, 2002, meeting with COGEMA staff.

Mr. Vasein responded with a response package submitted under cover of his letter of September 18, 2002. Review comments on this package were sent to Mr. Vasein under cover of my letter dated October 23, 2002. A response package was then received from Mr. Vasein under cover of his letter of January 9, 2003. Following Mark Taylor's discovery that no response had been made to one of his comments, I called Mr. Vasein and he responded with the missing pages, submitted under cover of his letter dated January 27, 2003.

Reviews of this proposal were carried out by Mark Taylor and Glenn Mooney. Their initials are attached to each of their comments.

Index of Changes

An Index of Changes was provided with the January 9, 2003, response package which correctly lists all of the changes proposed and the replacement pages provided. A follow-up Index of Changes page submitted with the January 27, 2003, submittal correctly listed the pages in that response package.

Continuity

No continuity problems were found.

Review

1. Section 3.3.2.2, Well Integrity Testing Procedures, Page 3-18, Paragraph 1

COGEMA provided a figure on page 3-18b which clearly illustrates repair methods for injection wells.

This is acceptable; no response is necessary. (MT)
2. Section 3.3.2.2, Well Integrity Testing Procedures, Pages 3-18 and 3-18a

The sentence stating wells that have failed mechanical integrity tests may be used for recovery wells has been removed as requested.

This is acceptable; no response is necessary.(GM)
3. Section 3.3.2.2, Well Integrity Testing Procedures, Page 3-18, Paragraph 2

The text of concern was totally eliminated.

This is acceptable; no response is necessary. (MT)
6. Section 6.1.2.2, Reverse Osmosis/Permeate Injection Phase, Page 6-8

The sentence stating the goal of groundwater restoration was to return the groundwater quality to Class of Use was removed as requested.

This is acceptable; no response is necessary. (GM)
7. Section 6.1.2.2, Reverse Osmosis/Permeate Injection Phase, Metal Reduction, Page 6-8

The text of concern was totally eliminated.

This is acceptable; no response is necessary. (MT)

COGEMA NSR Combined Review

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Page 3

11. Section 6.2.3.1, Well Plugging and Abandonment, Page 6-32, Paragraph 3

The four new figures (that is, figures on pages 6-32a, 6-32b, 6-32c, and 6-32d) clearly illustrate the abandonment methods described in the text.

This is acceptable; no response is necessary. (MT)

Conclusions

The application is now acceptable. A recommendation will be made to the Administrator for its approval..

\gm

cc: Cheyenne File

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