



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
URANIUM RECOVERY FIELD OFFICE
BOX 25325
DENVER, COLORADO 80225

JAN 3 1989

URFO:GRK
Docket No. 40-8907
SUA-1475, Amendment No. 4
04008907250E

United Nuclear Corporation
6501 Americas Parkway, NE, Suite 1040
Albuquerque, New Mexico 87110

Gentlemen:

We have reviewed your compliance monitoring submittal dated October 31, 1988. The staff has concluded that appropriate wells have been monitored for the hazardous constituents and chemical parameters specified in License Condition No. 30, Subsections A, B and C. Your analytical data and number of samples are consistent with Subsection E. This information provides a basis for amending Source Material License SUA-1475 as described below.

By this licensing action, the Commission is identifying the hazardous constituents, establishing the concentration limits and adjusting the points of compliance in accordance with Criterion 5B(1).

The hazardous constituents listed in this amendment meet the definition set forth in Criterion 5B(2), in that (a) they are reasonably expected to be in or derived from the byproduct material in the disposal area; (b) the constituent has been detected in the ground water in the uppermost aquifer; and (c) the constituent is listed in Criterion 13 of Appendix A, 10 CFR Part 40.

In the determination of background concentrations of the monitored parameters, we find that you did not comply with License Condition No. 30(D). In the absence of compliance with Condition 30(D), we have utilized the data that you submitted to establish background concentrations to be used in setting ground-water protection standards in accordance with Criterion 5B(5), Appendix A, 10 CFR Part 40. The analytical treatment of your data is discussed in the memorandum to files identified as Attachment A. Attachment B addresses the apparent noncompliance with License Condition No. 30(D) and requires a response within 30 days.

In the enclosed license amendment, we have established ground-water protection standards at the points of compliance. In accordance with Criterion 5B(5), these standards are the approved background concentration levels, or the Table 5C concentration values if they are higher.

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As was discussed in the Alternate Concentration Limits Workshop, which UNC representatives attended, a request for an alternate concentration limit submitted in accordance with Criterion 5B(6) must be based on consideration of corrective actions which reduce the concentration to a level that is as low as is reasonably achievable, and which can be shown to be acceptable from a health and safety standpoint. The concentration limits that you have proposed that did not conform to either the background or Table 5C values, would appear to be alternate concentration limits. We have deferred licensing action on these concentrations because your request is not substantiated by the appropriate restoration or health considerations. We are enclosing a copy of the Commission's draft staff position on how to prepare such an application.

Criterion 5D requires that if the ground-water protection standards are exceeded, a corrective action program must be put into operation as soon as is practicable, and in no event later than eighteen (18) months after the Commission finds that the standards have been exceeded. As a result of our evaluation of your ground-water monitoring data, we have determined that several of the standards have been exceeded. Specifically cyanide, gross alpha, lead-210, combined radium-226 and 228, selenium and thorium-210 are in exceedance of the standards in the alluvium. Beryllium, cadmium, cyanide, gross alpha, lead-210, nickel, combined radium-226 and 228, selenium and thorium-230 exceed standards in the Zone 1. Similarly, arsenic, beryllium, cadmium, chloroform, cyanide, gross alpha, lead, lead-210, naphthalene, nickel, combined radium-226 and 228, selenium, thorium-230, uranium and vanadium exceed standards in Zone 3. Therefore, UNC will be required to submit a corrective action plan. Your corrective action plan must be approved by our office and in operation by July 1, 1990. Accordingly, we are requesting a submittal of your proposed corrective action plan by April 1, 1989. Please include in this plan an estimate of the costs of the corrective action plan to be included in the financial surety required by Criterion 9 of Appendix A.

You will note that your amended ground-water monitoring program contains a data collection requirement for several ground-water constituents not considered hazardous. Prior to license termination, the National Environmental Policy Act (NEPA) requires that the NRC must make a determination whether there has been a significant impact on the quality of the human environment. This will require consideration of all contaminants affecting ground-water quality. Data from your monitoring program are necessary for NRC to make its NEPA determination. Although NRC ground-water protection standards have not been established for non-hazardous, non-radioactive contaminants, State standards as well as secondary use standards do exist. Prior to license termination, the results of your overall ground-water remediation program will be compared with ground-water protection standards as well as other State or secondary standards to determine the significance of impacts from your uranium recovery activities on the ground water. Accordingly, your corrective action program is to be directed at remediation not only of the hazardous constituents but other elevated parameters as well, such as total dissolved solids, nitrate, sulfate and other constituents as necessary.

We are aware of the ground-water remediation commitment that you have previously made to this office and your meetings with the EPA and the State of

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New Mexico, and are confident that UNC is in a position to submit a ground-water remediation proposal that includes corrective action in the alluvial materials zone. In light of the ground-water protection standards that have been established, you may wish to reevaluate the commitments that you have made in Zone 1 and Zone 3, and integrate them with similar commitments that have not been made, but are necessary for the alluvial materials.

Please also note that point of compliance wells have been established for the various zones of seepage. These wells were chosen based upon their ability to adequately monitor plume movement and provide early warning of leakage. In accordance with Criterion 5B(1), we have adjusted the point of compliance, selecting several additional monitoring wells. These adjustments are discussed in the attached memo to the docket file. In the selection of these wells, your March 1, 1988 submittal was consulted. To the extent possible, your proposals for point of compliance wells were utilized.

You will note that the ground-water requirements listed in License Condition No. 28 have been deleted from this license condition and now appear in License Condition No. 30. This consolidation effort brings all ground-water monitoring within a single license condition.

Based upon the data in your October 31, 1988 submittal, subsequent telephone conversations and pursuant to Title 10, Code of Federal Regulations, Part 40, Source Material License SUA-1475 is hereby amended by revising License Condition Nos. 28 and 30 to read as follows:

28. The licensee shall implement the radiation safety and environmental monitoring programs specified in the licensee's submittals dated February 13 and March 16, 1987, with the following modifications or additions:
 - A. A copy of the report documenting the ALARA audit discussed in the February 13, 1987 submittal shall be submitted to the Uranium Recovery Field Office, USNRC, within 30 days of completion of the audit.
 - B. Action levels for surface and personnel contamination surveys shall be as specified in Table 1 of the licensee's Procedure EMP-8.
 - C. Instrument alarm points for alpha survey equipment shall be determined based on the efficiency of the instrument and the area of the probe.
 - D. EPA-certified laboratories shall be utilized for all sample analyses.
 - E. Lower limits of detection utilized for analysis of in-plant and environmental samples shall be in accordance with recommendations contained in Table 2 of Regulatory Guide 8.30 and Section 5 of Regulatory Guide 4.14, respectively.

- F. Notwithstanding the ground-water monitoring specified in the licensee's submittals, the licensee shall perform the compliance monitoring program specified in License Condition No. 30.
30. The licensee shall implement a compliance monitoring program containing the following:
- A. Sample Wells GW 1-4; EPA Wells 1-28 and EPA-22A (excepting EPA Wells 6, 10, 16, 19, 20, 21, 22, 24 and 26); and Wells 411, 420, 501-B, 502-B, 504-B, 509-D, 515A, 516A, 517, 518, 604, 614, 619, 632, TWQ-9D, TWQ-106D, TWQ-29A, TWQ-141, TWQ-142 and TWQ-143, on a quarterly frequency for chloride, nitrate, sulfate, ammonia, manganese, calcium, magnesium, sodium, bicarbonate, potassium, field-pH, TDS and water level, and on a semiannual frequency for arsenic, beryllium, cadmium, chloroform, cyanide, lead, lead-210, naphthalene, nickel, combined radium-226 and 228, selenium, thorium-230, uranium, gross alpha and vanadium.

Notwithstanding the above, the licensee is only required to sample EPA wells after receipt of written authorization by the land owner to enter that area for the purpose of sampling ground water from those specified wells. The licensee shall make every reasonable effort to obtain such authorization. If authorization is not obtained, the licensee shall inform the NRC, Uranium Recovery Field Office, promptly.

- B. Comply with the following ground-water protection standards at point of compliance wells GW-1, GW-2, 632, EPA-23, EPA-28, 509-D and EPA-22A in the alluvium; 614, 604, EPA-4, EPA-7 and 516-A in Zone 1; and 517, 518, EPA-3, 501-B and EPA-18 in Zone 3:

arsenic = 0.05 mg/l, beryllium = 0.05 mg/l, cadmium = 0.01 mg/l, chloroform = 0.001 mg/l, cyanide = 0.005 mg/l, gross alpha = 15.0 pCi/l, lead = 0.05 mg/l, lead-210 = 1.0 pCi/l, naphthalene = 0.001 mg/l, nickel = 0.05 mg/l, radium-226 and 228 = 5.0 pCi/l, selenium = 0.01 mg/l, thorium-230 = 5.0 pCi/l, uranium = 0.3 mg/l and vanadium = 0.1 mg/l.

- C. Implement a corrective action program in Zones 1 and 3 and the alluvium due to exceedance of ground-water protection standards with the objective of returning the concentrations of arsenic, beryllium, cadmium, chloroform, cyanide, gross alpha, lead, lead-210, naphthalene, nickel, radium-226 and 228, selenium, thorium-230, uranium and vanadium to the concentration limits specified in Subsection (B).

The corrective action program shall be proposed as designated in Criterion 5D, Appendix A, 10 CFR Part 40. Accordingly, the licensee shall, as soon as practicable but in no event later than April 1, 1989, submit to the Uranium Recovery Field Office a proposed corrective action program and cost estimate with supporting rationale for Commission

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approval. The corrective action program shall be in operation by July 1, 1990.

All other conditions of this license shall remain the same. The effect of this amendment is to incorporate ground-water protection standards into your license and modify your license to recognize submittal of water quality data. The license is being reissued in its entirety to incorporate the revisions specified above.

The response directed by the Attachment B, Notice of Violation, is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL-96-511.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter and enclosures will be placed in the NRC's Public Document Room.

FOR THE NUCLEAR REGULATORY COMMISSION



R. Dale Smith, Director
Uranium Recovery Field Office
Region IV

Enclosures: Source Material License SUA-1475
Attachment A: Staff Review Memorandum
Attachment B: Notice of Violation
Draft Technical Position on ACLs



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
URANIUM RECOVERY FIELD OFFICE
BOX 25325
DENVER, COLORADO 80225

ATTACHMENT A

URFO:GRK
Docket No. 40-8907
SUA-1475, Amendment No. 4
04008907250E

MEMORANDUM FOR: Docket File No. 40-8907

FROM: Gary R. Konwinski, Project Manager
Licensing Branch 1
Uranium Recovery Field Office, Region IV

SUBJECT: ESTABLISHMENT OF GROUND-WATER PROTECTION STANDARDS

Introduction

By letter dated October 31, 1988, United Nuclear Corporation (UNC) submitted ground-water quality data in response to License Condition No. 30. A review of the data package indicates that the appropriate wells were sampled for hazardous constituents as well as chemical parameters which meet the requirements of Subsections A-C of License Condition No. 30. UNC did not, however, utilize monitor wells other than those listed in Subsection A of License Condition No. 30 for the establishment of background. Due to this, the staff utilized the monitor well data supplied by UNC which is within and adjacent to the zones of tailings seepage to establish background and set ground-water protection standards.

Point of Compliance Wells

In a March 1, 1988 submittal, UNC had proposed point of compliance wells for monitoring the alluvium as well as Zones 1 and 3. In the alluvial materials, UNC proposed to utilize Wells GW-1, GW-2 and EPA-28 as point of compliance wells. A staff review of this proposal indicates that these wells would not provide prompt detection of leakage of hazardous constituents along the western edge of the tailings disposal area. Due to this, the staff would recommend that Wells GW-1, GW-2, 632, EPA-23, EPA-28, 509-D and EPA-22A be utilized as points of compliance. This well selection includes the wells proposed by UNC as well as several other wells along the western edge of the tailings disposal area.

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UNC's proposal to monitor Wells 614, 604 and 516-A as points of compliance for Zone 1 represent appropriate wells and will therefore be utilized. Additionally, Wells EPA-4 and EPA-7 will give more depth to the monitoring program and should therefore be utilized as points of compliance.

In Zone 3, UNC has proposed Well EPA-11 for a point of compliance. This well was determined to be too distant from the tailings disposal area to provide prompt detection and therefore was not chosen as a point of compliance. Additionally, a single compliance point for a plume of this size would not provide sufficient monitoring. In its place, a line of wells consisting of Wells 517, 518, EPA-3, 501B and EPA-18 across the Zone 3 plume was chosen.

Ground-Water Protection Standards

The data which UNC has collected over the past several years and submitted to this office, as well as the data collected in response to License Condition No. 30, is sufficient to establish ground-water protection standards for the site. Table 1 shows the calculated background determined from the wells UNC monitored for appropriate Criterion 13 hazardous constituents as well as thorium-230 and lead-210, the wells which have exceeded the calculated background, the applicable ground-water protection standard considering Table 5C of 10 CFR 40, Appendix A, and the wells exceeding the ground-water protection standards.

Background values were determined by two methods. The initial method observed the water analysis values from their respective lower limits of detection. Where it was determined that the majority of the sample population was below the lower limit of detection, the lower limit of detection was then utilized as a background value. This method had applicability for arsenic, barium, beryllium, chloroform, chromium, cyanide, lead, lead-210, naphthalene, selenium, silver and vanadium. For the constituents of gross alpha, combined radium-226 and 228, thorium-230 and uranium, a graphical solution was utilized. This solution plotted the water quality analysis values from lowest to highest values, and noted where the plot deflected. The deflection point was then utilized as the background concentration.

The ground-water protection standards were then established in accordance with Criterion 5B(5), Appendix A, 10 CFR Part 40, as the Commission approved background concentration of a constituent in ground water or the respective value in the table in paragraph 5C, if the constituent is listed in the table and if the background level of the constituent is below the value listed.

Based upon this data review, the staff finds that the ground-water protection standards are being exceeded for arsenic, beryllium, cadmium, chloroform, cyanide, gross alpha, lead, naphthalene, nickel, radium-226 and 228, selenium, thorium-230, uranium and vanadium at numerous monitoring well locations. Therefore, as discussed in Criterion 5D, a corrective action program must be put into operation.

Based upon the above discussion, the staff recommends that License Condition Nos. 28 and 30 be revised to incorporate a modified ground-water monitoring

Table 1

	Calculated Background	Wells Exceeding Calculated Background	Ground-Water Protection Stds	Wells Exceeding Ground-Water Protection Standards
Arsenic	0.001 mg/l	509-D, EPA-28, 515-A, 604, EPA-2, EPA-4, EPA-5, EPA-8, 9-D, 106-D, 411, 420, 501-B, 502-B, 504-B, 517, 518, EPA-1, EPA-3, EPA-9, EPA-11, EPA-12, EPA-13, EPA-14, EPA-15, EPA-17, EPA-19	0.05 mg/l	501-B, 504-B, EPA-11, EPA-17, EPA-18
Barium	0.1 mg/l	None	1.0 mg/l	None
Beryllium	0.05 mg/l	515-A, 501-B, 518, EPA-13	0.05 mg/l	515-A, 501-B, 518, EPA-13
Cadmium	0.01 mg/l	EPA-7, 501-B, EPA-1, EPA-11, EPA-13, EPA-18	0.01 mg/l	EPA-7, 501-B, EPA-1, EPA-11, EPA-13, EPA-18
Chloroform	0.001 mg/l	614, 9-D, 106-D, 502-B, 517, 518	0.001 mg/l	614, 9-D, 106-D, 502-B, 517, 518
Chromium	0.05 mg/l	None	0.05 mg/l	None
Cyanide	0.005 mg/l	GW-1, GW-2, GW-3, GW-4, 509-D, 632, EPA-23, EPA-25, EPA-27, EPA-28, 515-A, 516-A, 604, 614, EPA-7, 106-D, 502-B, 517, EPA-14	0.005 mg/l	GW-1, GW-2, GW-3, GW-4, 509-D, 632, EPA-23, EPA-25, EPA-27, EPA-28, 515-A, 516-A, 604, 614, EPA-7, 106-D, 502-B, 517, EPA-14
Lead	0.05 mg/l	EPA-3, EPA-18	0.05 mg/l	EPA-3, EPA-18
Lead-210	1.0 pCi/l	GW-3, GW-4, 509-D, 632, EPA-22A, EPA-23, EPA-25, EPA-27, EPA-28, 515-A, 604, 614, EPA-4, EPA-5, EPA-7, EPA-8, 9-D, 106-D, 411, 420, 501-B, 502-B, 517, 518, EPA-1, EPA-3, EPA-9, EPA-11, EPA-12, EPA-13, EPA-15, EPA-17, EPA-18	1.0 pCi/l	GW-3, GW-4, 509-D, 632, EPA-22A, EPA-23, EPA-25, EPA-27, EPA-28, 515-A, 604, 614, EPA-4, EPA-5, EPA-7, EPA-8, 9-D, 106-D, 411, 420, 501-B, 502-B, 517, 518, EPA-1, EPA-3, EPA-9, EPA-11, EPA-12, EPA-13, EPA-15, EPA-17, EPA-18

Table 1 (cont.)

	Calculated Background	Wells Exceeding Calculated Background	Ground-water Protection Stds	Wells Exceeding Ground-Water Protection Standards
Naphthalene	.001 mg/l	502-B	0.001 mg/l	502-B
Nickel	0.05 mg/l	515-A, 516-A, 604, EPA-7, 9-D, 106-D, 411, 501-B, 502-B, 504-B, 518, EPA-9, EPA-11, EPA-12, EPA-13, EPA-14, EPA-17, EPA-18	0.05 mg/l	515-A, 516-A, 604, EPA-7, 9-D, 106-D, 411, 501-B, 502-B, 504-B, 518, EPA-9, EPA-11, EPA-12, EPA-13, EPA-14, EPA-17, EPA-18
Radium-226 & 228	5.0 pCi/l	GW-4, 632, EPA-27, EPA-28, 515-A, 516-A, 604, 619, EPA-2, EPA-4, EPA-5, EPA-7, EPA-8, 9-D, 106-D, 411, 420, 501-B, 502-B, 504-B, 517, 518, EPA-9, EPA-11, EPA-12, EPA-13, EPA-14, EPA-15, EPA-17, EPA-18	5.0 pCi/l	GW-4, 632, EPA-27, EPA-28, 515-A, 516-A, 604, 619, EPA-2, EPA-4, EPA-5, EPA-7, EPA-8, 9-D, 106-D, 411, 420, 501-B, 502-B, 504-B, 517, 518, EPA-9, EPA-11, EPA-12, EPA-13, EPA-14, EPA-15, EPA-17, EPA-18
Selenium	0.001 mg/l	GW-1, GW-2, GW-3, GW-4, 509-D, 632, EPA-22A, EPA-23, EPA-27, EPA-28, 515-A, 516-A, 604, 614, EPA-7, 9-D, 106-D, 502-B, 517, 518, EPA-1	0.01 mg/l	GW-1, GW-4, EPA-27, 516-A, 614, EPA-7, 502-B
Silver	0.05 mg/l	None	0.05 mg/l	None
Thorium-230	5.0 pCi/l	GW-1, GW-2, GW-3, GW-4, 632, EPA-23, EPA-25, EPA-28, 515-A, 516-A, 604, 614, 619, EPA-2, EPA-7, 9-D, 501-B, 502-B, 504-B, 517, 518, EPA-1, EPA-3, EPA-11, EPA-13, EPA-18	5.0 pCi/l	GW-1, GW-2, GW-3, GW-4, 632, EPA-23, EPA-25, EPA-28, 515-A, 516-A, 604, 614, 619, EPA-2, EPA-7, 9-D, 501-B, 502-B, 504-B, 517, 518, EPA-1, EPA-3, EPA-11, EPA-13, EPA-18
Uranium	0.3 mg/l	501-B, 517, 518	0.3 mg/l	501-B, 517, 518

Table 1 (cont.)

	Calculated Background	Wells Exceeding Calculated Background	Ground-water Protection Stds	Wells Exceeding Ground-Water Protection Standards
Gross Alpha EPA-7,	15.0 pCi/l	632, EPA-22A, EPA-23, EPA-28, 516-A, 604, 614, EPA-2, EPA-4, EPA-5, EPA-7, EPA-8, 411, 501-B, 502-B, 504-B, 518, EPA-1, EPA-3, EPA-9, EPA-11, EPA-12, EPA-13, EPA-17, EPA-18	15.0 pCi/l	632, EPA-22A, EPA-23, EPA-28, 516-A, 604, 614, EPA-2, EPA-4, EPA-5, EPA-8, 411, 501-B, 502-B, 504-B, 518, EPA-1, EPA-3, EPA-9, EPA-11, EPA-12, EPA-13, EPA-17, EPA-18
Vanadium	0.1 mg/l	518	0.1 mg/l	518

program as well as require the submittal of a corrective action program that has as its goal, meeting the ground-water protection standards in Zones 1 and 3 as well as the alluvium.

Conclusion

Based upon the above discussion, the staff would recommend that License Condition Nos. 28 and 30 be revised to read as follows:

28. The licensee shall implement the radiation safety and environmental monitoring programs specified in the licensee's submittals dated February 13 and March 16, 1987, with the following modifications or additions:
 - A. A copy of the report documenting the ALARA audit discussed in the February 13, 1987 submittal shall be submitted to the ~~Uranium Recovery Field Office, USNRC, within 30 days of~~ completion of the audit.
 - B. Action levels for surface and personnel contamination surveys shall be as specified in Table 1 of the licensee's Procedure EMP-8.
 - C. Instrument alarm points for alpha survey equipment shall be determined based on the efficiency of the instrument and the area of the probe.
 - D. EPA-certified laboratories shall be utilized for all sample analyses.
 - E. Lower limits of detection utilized for analysis of in-plant and environmental samples shall be in accordance with recommendations contained in Table 2 of Regulatory Guide 8.30 and Section 5 of Regulatory Guide 4.14, respectively.
 - F. Notwithstanding the ground-water monitoring specified in the licensee's submittals, the licensee shall perform the compliance monitoring program specified in License Condition No. 30.
30. The licensee shall implement a compliance monitoring program containing the following:
 - A. Sample Wells GW 1-4; EPA Wells 1-28 and EPA-22A (excepting EPA Wells 6, 10, 16, 19, 20, 21, 22, 24 and 26); and Wells 411, 420, 501-B, 502-B, 504-B, 509-D, 515A, 516A, 517, 518, 604, 614, 619, 632, TWQ-9D, TWQ-106D, TWQ-29A, TWQ-141, TWQ-142 and TWQ-143, on a quarterly frequency for chloride, nitrate, sulfate, ammonia, manganese, calcium, magnesium, sodium, bicarbonate, potassium, field-pH, TDS and water level, and on a semiannual frequency for arsenic, beryllium, cadmium, chloroform, cyanide, lead, lead-210, naphthalene, nickel, combined radium-226 and 228, selenium, thorium-230, uranium, gross alpha and vanadium.

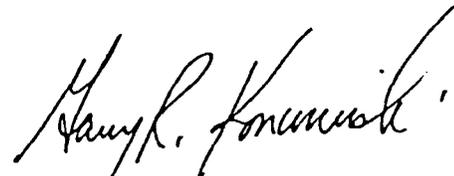
Notwithstanding the above, the licensee is only required to sample EPA wells after receipt of written authorization by the land owner to enter that area for the purpose of sampling ground water from those specified wells. The licensee shall make every reasonable effort to obtain such authorization. If authorization is not obtained, the licensee shall inform the NRC, Uranium Recovery Field Office, promptly.

- B. Comply with the following ground-water protection standards at point of compliance wells GW-1, GW-2, 632, EPA-23, EPA-28, 509-D and EPA-22A in the alluvium; 614, 604, EPA-4, EPA-7 and 516-A in Zone 1; and 517, 518, EPA-3, 501-B and EPA-18 in Zone 3:

arsenic = 0.05 mg/l, beryllium = 0.05 mg/l, cadmium = 0.01 mg/l, chloroform = 0.001 mg/l, cyanide = 0.005 mg/l, gross alpha = 15.0 pCi/l, lead = 0.05 mg/l, lead-210 = 1.0 pCi/l, naphthalene = 0.001 mg/l, nickel = 0.05 mg/l, radium-226 and 228 = 5.0 pCi/l, selenium = 0.01 mg/l, thorium-230 = 5.0 pCi/l, uranium = 0.3 mg/l and vanadium = 0.1 mg/l.

- C. Implement a corrective action program in Zones 1 and 3 and the alluvium due to exceedance of ground-water protection standards with the objective of returning the concentrations of arsenic, beryllium, cadmium, chloroform, cyanide, gross alpha, lead, lead-210, naphthalene, nickel, radium-226 and 228, selenium, thorium-230, uranium and vanadium to the concentration limits specified in Subsection (B).

The corrective action program shall be proposed as designated in Criterion 5D, Appendix A, 10 CFR Part 40. Accordingly, the licensee shall, as soon as practicable but in no event later than April 1, 1989, submit to the Uranium Recovery Field Office a proposed corrective action program and cost estimate with supporting rationale for Commission approval. The corrective action program shall be in operation by July 1, 1990.



Gary R. Konwinski, Project Manager
Licensing Branch 1
Uranium Recovery Field Office
Region IV

Approved by:



Edward F. Hawkins, Chief
Licensing Branch 1
Uranium Recovery Field Office, Region IV