

# Umetco Minerals Corporation

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March 1, 2006

Mr. William von Till, Project Manager  
Fuel Cycle Facilities Branch  
Division of Fuel Cycle Safety and Safeguards  
Mail Stop T-8-A-33  
Two White Flint North, 11545 Rockville Pike  
Rockville, Maryland 20852-2738

Re: Materials License SUA-648, Docket No. 40-0299  
Request to Eliminate License Condition 34 – Environmental Monitoring

Dear Mr. von Till

Umetco Minerals Corporation (Umetco) is requesting the elimination of License Condition 34, U.S. Nuclear Regulatory Commission (NRC) Materials License Number SUA-648, for Umetco's Gas Hills Uranium Mill Site. Specifically, Umetco is requesting the elimination of environmental air particulate sampling, semi-annual environmental radon-222 monitoring and quarterly environmental gamma monitoring. Justification for this request is as follows:

- Reclamation of the Above Grade, Heap Leach and A-9 tailings repositories has been completed. The radon exit flux for each of the repositories meets Criterion 6 in 10 CFR 40, Appendix A. Gamma exposure rates from the repositories meet the 30 microrentgen per hour limit specified in the Final Status Survey Plan as referenced by License Condition 30.
- Clean-up of windblown contaminated materials was completed in September 2003 and approved by the NRC in the letter dated September 27, 2004.
- GHP-2 is the only repository with exposed licensed material at the site. Radon barrier has been placed over 92 percent (32.5 acres) of the repository. NESHAP sampling was conducted for 60 of the 100 required locations and the preliminary results show the average radon exit flux is below the limit specified in Criterion 6, 10 CFR 40, Appendix A. Approximately 2.5 acres of exposed licensed material has been left open for the burial of any remaining 11e.(2) materials encountered during the remaining site reclamation activities.

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- Environmental air particulate sampling was suspended in 2002 as historical data since 1992 has shown airborne concentrations of natural uranium, thorium-230, radium-226 and lead-210 are consistently well below (between 1 and 4 percent) the standards specified in 10 CFR 20, Appendix B, Table 2. Suspension of air particulate sampling is at the discretion of the site Radiation Safety Officer as authorized by License Condition 34A.
- Radon-222 concentrations at the at the downwind monitoring location (Tower 1) have been lower or equal to the concentrations observed at the background monitoring location (Tower 4) since 1987.
- The public gamma dose was 75 millirem during 2005 and has been below the 100 millirem public dose limit for the past 10 years.
- Personnel monitoring indicates that gamma exposure to on-site workers has been maintained at less than 10 percent of the standard for the past 10 years.

The near completion of the reclamation work and the results of environmental sampling indicate that the site is at or below background radiation levels. It is Umetco's position that there is minimal benefit from continuation of the environmental monitoring required by License Condition 34.

If you or your staff has any questions or need additional information, please contact me at (970) 256-8889 or by e-mail at [gieckte@dow.com](mailto:gieckte@dow.com).

Sincerely,



Thomas E. Gieck  
Remediation Leader

TEG/esh

cc: Mark Moxley, WDEQ