

From: Ron Linton
To: HARDGROVE Tom (AREVA RESOURCES INC)
Date: 02/20/2008 5:27:39 PM
Subject: Re: Status of CR/IR Public Notice, etc.

Tom:

The letter is with Keith, Scott, or Larry. I checked yesterday and the secretaries could not tell me who had the letter. Keith is on travel and it may be on Scott or Larry's desk. As soon as the letter is signed out (hopefully soon), the FRN can go out. The FRN references the letter we are sending so it can't go out before the letter. The FRN is also with Keith and both have been reviewed by OGC.

We have written to SHPO (ML080180143). We have not received a response at this time. I also have info from FWS on Endangered and Threatened species (ML080300562).

The following is information we will **likely** be requesting for updating for the license amendment restart. Some of this information you are already working on or have verbally relayed to me, but it should be sent to us formally (once it is requested formally).

1. Provide information on historic properties or cultural resources within the Irigaray/ Christensen Ranch licensed boundary that are newly identified or differ from those already evaluated during the 1998 license renewal.

COGEMA provided historic and cultural resource information in previous documents related to licensing and license renewal. This information has been reviewed and sensitive areas identified have been protected by license condition and agreement by COGEMA. If there are other areas that are known or have been identified by COGEMA in the licensed area, they will have to be evaluated prior to a return to operating status.

2. Provide an updated wildlife and vegetative survey within the Irigaray/ Christensen Ranch licensed boundary.

An up-to-date wildlife and vegetative survey within the Irigaray/ Christensen Ranch licensed boundary is needed. Specifically, endangered, threatened, and proposed and candidate species listed by the U.S. Fish and Wildlife Service for Johnson and Campbell Counties, Wyoming need to be identified so they can be adequately evaluated prior to a return to operating status.

3. Provide updated information on other activities in the nearby surroundings of the Irigaray/Christensen Ranch facilities that may be used to update and evaluate cumulative impacts on the environment.

There are other mining and extractive industries that are active in the region, such as other uranium mining and milling companies as well as coal bed methane. There may be others of which the NRC is not aware. This information will allow an updated evaluation of cumulative effects on the environment from various activities ongoing in the area.

4. Provide updated information on changes in transportation activities that are likely to occur due to a change from decommissioning status to operating status.

Discuss the potential impacts that increases in transportation activities due to the restart of operations may have on the area, including increases in car and truck traffic. Verify that accident scenarios discussed in past licensing documents are still applicable and explain why or why not. Discuss the possible impacts, if any, from transportation of materials both off site and on site.

5. Provide updated information on social or economic impacts that may occur that are different, if any, from those identified in the last license application.

Discuss the socio-economic impacts that restarting the facility may have on the community, either adverse

or beneficial. Update social and economic data that was provided in Section 7.6 of the License Application, Revision R1, 09-03-97.

6. Provide an updated list of any wells that are currently on excursion and provide a plan for removing the wells from excursion status.

If any wells are on excursion status, provide an explanation as to how and when COGEMA will work towards ending the excursions. Provide an estimate of when wells on excursion status may be removed and how it will be accomplished.

7. Provide a discussion of noise impacts that may occur as a result of the return to operating status.

In the 1997 license application and revisions, noise impacts were not evaluated. This is an area that has been identified that should be evaluated prior to amending the license to return to operating status. Section 5.4.7 of NUREG-1748 provides a discussion of methods used and what should be considered when analyzing and assessing predicted noise levels.

8. Provide a discussion of visual and scenic impacts that may occur as a result of the return to operating status.

In the 1997 license amendment revisions, visual and scenic impacts were not evaluated. This is an area that has been identified that should be evaluated prior to amending the license to return to operating status. Section 5.4.9 of NUREG-1748 provides a discussion of methods used and what should be considered when analyzing and assessing visual and scenic impacts.

9. Provide a discussion of the impacts of implementing a return to operating status.

In addition to providing information on the impacts expected once the site is in operating status, information should also be provided on the impacts of the logistical processes that will temporarily be in place in order to return the site to an operating status.

10. Provide a discussion of changes that were made in License Condition (LC) 10.8 in amendment 4 that changed the time allowed for suspension of operations in the dry/pack area from immediately to one hour.

In License Amendment 4 through 12, LC 10.8 states that "Operations shall be suspended within 1 hour in the dry/pack area of the plant if any of the emission control equipment for the yellowcake drying or packaging areas is not operating within the ranges permitted by WDEQ Air Quality Permit No. OP-254." In Amendment 3, LC 10.8 states that "Operations shall be immediately suspended..." This change from "immediately" to "within 1 hour" took place in Amendment 4, as operations changed from production to reclamation. Discuss the potential environmental impacts from this change, if any, that would result when the facility is in operating status.

11. Confirm that the environmental information in section 7.0 of the COGEMA Irigaray/ Christensen Ranch License Application is still applicable.

Identify information that is outdated and update as necessary.

Hope this answers some questions. I was waiting to respond, thinking I could tell you today the letter has been sent. Hopefully, this will give you an idea of what info you will need to collect and submit.

Ron

>>> "HARDGROVE Tom (AREVA RESOURCES INC)" <tom.hardgrove@areva.com> 2/20/2008 4:35 PM
>>>

Ron:

Any more movement? If not, what is the problem? Should we be calling someone, sending a letter, or what?

Tom

Mail Envelope Properties (47BCA95B.F53 : 8 : 11688)

Subject: Re: Status of CR/IR Public Notice, etc.
Creation Date 02/20/2008 5:27:39 PM
From: Ron Linton
Created By: RCL1@nrc.gov

Recipients

areva.com

tom.hardgrove (HARDGROVE Tom (AREVA RESOURCES INC))

Post Office**Route**

areva.com

Files	Size	Date & Time
MESSAGE	8794	02/20/2008 5:27:39 PM

Options

Expiration Date: None
Priority: Standard
ReplyRequested: No
Return Notification:
Send Notification when Opened

Concealed Subject: No
Security: Standard