



UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON NUCLEAR WASTE
WASHINGTON, D.C. 20555

April 30, 1992

The Honorable Ivan Selin
Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Chairman Selin:

SUBJECT: STAFF TECHNICAL POSITION ON ALTERNATE CONCENTRATION
LIMITS FOR TITLE II URANIUM MILLS

During its 42nd meeting, April 22-24, 1992, the Advisory Committee on Nuclear Waste met with members of the NRC staff to review a draft version of the Staff Technical Position on Alternate Concentration Limits for Title II Uranium Mills. The Committee also had the benefit of the reference cited at the end of this letter.

We believe that this technical position represents the culmination of considerable effort on the part of the staff in response to a need of the uranium industry. This technical position is limited in its application to the surface impoundment of the mill tailings. The staff has done an excellent job in collecting the information necessary for the preparation of documents in support of a request to implement alternate concentration limits under specified conditions. Further, the rationale for the alternate concentrations rests appropriately on Environmental Protection Agency standards. This rationale is described in the technical position as reasonable, while maintaining protection of the health and safety of the public and the environment. We conclude that this technical position should be issued as soon as feasible.

We recognize that a few uranium mills have returned some of their tailings to parts of mines. We urge that the staff prepare a corresponding document to address potential alternate concentration limits for these cases which require considerations different from those in the technical position we reviewed.

We trust that these comments will be helpful.

Sincerely,

Dade W. Moeller
Chairman

Reference:

Letter from J. J. Surmeier, NMSS, to R. K. Major, ACNW, April 1, 1992, Subject: Proposed Final Technical Position on Alternate Concentration Limits for Uranium Mills (**INTERNAL USE ONLY**)