



STATE OF NEW MEXICO

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TO: File
FROM: Kent Breese
DATE: August 24, 1982
SUBJECT: Unresolved Issues between UNC and the Uranium
Licensing Section

I. Radioactive Material License Renewal Application

- A. On December 31, 1981, UNC submitted a license renewal application. UNC's license was extended as provided by Part 3-340B. of the Radiation Protection Regulations until the Division reaches a decision on whether to renew it.
- B. On March 1, 1982, the Uranium Licensing Section advised UNC that stated deficiencies made it impossible to accept the application for review at that time.
- C. To date no written response to EID's comments has been received from UNC.

II. Shutdown

- A. UNC shut down its mill on May 3, 1982.
- B. Part 12 of the Radiation Protection Regulations requires stabilization of inactive piles as soon as practicable after one year after the last addition of material.
- C. On June 16, 1982, the Uranium Licensing Section met with Todd Miller of UNC to discuss required details of a forthcoming request by UNC for an amendment to their extended radioactive materials license permitting non-operation of the mill. To date no request has been received.

III. South Pond/Neutralization

- A. On January 26, 1982, Jerry Stewart wrote UNC amending their license to allow neutralization, but prohibiting reopening the South Pond until data from neutralization program indicated a substantial reduction in dissolved radioactive contaminant concentrations.
- B. UNC has request reconsideration of Mr. Stewart's limitation but has not been able to provide the required data during shutdown.

IV. New Site

- A. UNC has made several commitments in writing to move to a new site. In a December 31, 1981 radioactive materials license renewal application, however, UNC states that it "plans to use the existing disposal facility until it has reached maximum capacity.
- B. In a groundwater discharge plan submitted in December 1980, UNC stated that "the tailings from the existing disposal site will be excavated and transported to the new site." In the radioactive material license renewal application submitted December 31, 1981, however, UNC described a detailed plan for stabilization of tailings on the existing disposal site.

V. Backfill

- A. An amendment to UNC's license allowing backfilling of the N.E. Church Rock mine with coarse, dry tailings has been extended with the license. A ground water contamination model to be used in evaluating UNC's application for license renewal is expected in September 1982.
- B. A modified, reduced in scope radiological monitoring program for the backfilling operation was verbally proposed by Todd Miller on June 18, 1982, and has yet to be recieved.

VI. Seepage

- A. To date only one monitoring well (non-restricted area well TWQ-124) has shown any radionuclide levels above MPC. (Th-230 was measured at 3700 pCi/l; MPC is 2000 pCi/l).
- B. Monitoring data from additional wells was requested on February 9, 1982, and September 15, 1981. The additional data has not yet been provided. Todd Miller promised on August 24, 1982, to follow up on our request.