Waste Management questions for Moore Ranch SEIS
Teleconference May 4, 2010

The Applicant's ER estimates that 2000 yds3 will be generated at Moore Ranch annually. Does this estimate apply to the decommissioning phase? If not, how much solid waste will be generated during decommissioning annually?

- The 2000 yds3 estimate is based on operations and did not include decommissioning wastes. Based on the surety estimate in the Moore Ranch Application an estimate of 59,500 yds3 of non 11e.(2) solid waste could be generated during the decommissioning phase of the project. Assumptions made in the estimate were that all non 11e.(2) solid waste would go to a landfill and no onsite disposal or retention of site structures was considered.

The ER only identifies "the nearest sanitary landfill" as the disposal location for non-radioactive, non-contaminated solid waste. Please provide the following details about the disposal site:

- *Name and location of expected disposal site, and name and contact information for the landfill operator.*

  In the response to Question 3.2 #3 from the Environmental Report RAI, Uranium One identified the Midwest-Edgerton #2 disposal site located in Midwest, Wyoming as the preferred location for disposal of solid (nonradioactive) waste. However, WDEQ comments on the SEIS have indicated that this municipal landfill may be out of capacity by the end of 2010. Midwest-Edgerton #2 was identified as the preferred location due to proximity to Moore Ranch to minimize waste transportation impacts.

  Should the Midwest-Edgerton #2 landfill close without providing replacement solid waste disposal capacity in the Midwest area, Uranium One would likely ship solid waste to the Casper Solid Waste Facility. In fact, solid waste at the Uranium One Irigaray and Christensen Ranch uranium project are now handled by a contract waste transportation and disposal service that uses the Casper Solid Waste Facility.

  Contact information for the operator of the Casper Solid Waste Facility is:

  City of Casper Garbage and Hazardous Waste, 1886 N. Station Rd., Casper, WY. (307) 235-8246.

- *Does the landfill have existing capacity to accept 2000 yds3 of solid waste for the next 12 years (applicants projected life of project)?*

Uranium One has attempted to reach the Manager of the City of Casper Solid Waste Facility, Cindy Langston, for the past few days. We will continue to try to reach her and determine the remaining disposal capacity and provide that to NRC.

- *If the landfill does not have the needed capacity and lifetime, where will solid wastes be disposed of?*

  Uranium One believes that it is unlikely that disposal capacity at the City of Casper will become an issue for the project. The relatively small volume of solid waste from the Moore Ranch project and the ongoing need that a city the size of Casper will have indicate that should the current landfill reach capacity and close an alternative will be identified and developed.

- *Is the proposed landfill permitted to accept hazardous wastes (e.g., used oil, spent batteries, waste solvents, waste chemicals) from an industrial/commercial business? If not, where will hazardous wastes generated at the Moore Ranch facility be disposed of?*

  The Casper Solid Waste Facility is permitted to receive hazardous wastes from Conditionally Exempt Small Quantity Generators (CESQG). The Moore Ranch application notes that the operation is expected to be a CESQG based on the processes involved and the status of other operating in situ uranium facilities. The only hazardous wastes that Uranium One expects will be generated are used oil, which will be recycled with a licensed oil recycler, and universal wastes, such as spent batteries. Uranium One does not expect to produce waste solvents or waste chemicals.

  In order to qualify as a CESQG with the City of Casper, waste generators must submit a Certification Agreement and a Waste Inventory Form. Following this, the City of Casper CESQG Hazardous Waste Collection Program representative arranges an on-site assessment of the CESQG hazardous waste generation operations.

Status of an agreement for disposal of 11e.(2) Byproduct Material

In the response to Question 4.13 #2 from the Environmental Report RAI, Uranium One identified the Pathfinder Mines Shirley Basin site as the preferred location for disposal of 11e.(2) byproduct material. Uranium One has a disposal agreement with Pathfinder Mines for disposal of byproduct material generated at the Irigaray and Christensen Ranch uranium project and is currently negotiating a similar (or modified) agreement for disposal of byproduct material from Moore Ranch.

If Pathfinder Mines is not available for disposal of byproduct material from Moore Ranch, Uranium One noted in the RAI response that an alternate location would be the Energy Solutions disposal site in Clive, Utah. Uranium One has met with Energy Solutions and is currently reviewing a draft disposal agreement.

Uranium One notes that a byproduct disposal agreement will be required before injection of lixiviant at Moore Ranch and the maintenance of a valid disposal agreement during the life of the facility will be a condition of the NRC License.