

40-8102/GCP/83/09/29/1

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OCT 13 1983

Docket File 8102
PDR/DCS
Region IV
GPangburn
URFO r/f
WDEQ

URFO:GCP
Docket No. 40-8102
04008102060E

Exxon Minerals Company
Post Office Box 3020
Casper, Wyoming 82602

Gentlemen:

The Uranium Recovery Field Office staff, USNRC, has completed its review of the "Highland Uranium Tailings Impoundment Seepage Study" submitted by Exxon Minerals Company to fulfill License Condition 34 of Source Material License No. SUA-1139. The study was required by URFO to provide information about the extent and direction of seepage from the tailings basin and to assess the adequacy of the existing ground-water monitoring system.

The Exxon study concluded that seepage is occurring at the Highland facility and recommended that three additional ground-water monitoring wells be installed south and northwest of the impoundment. In reviewing the Exxon study, the staff felt that although the wells proposed in the seepage study may prove useful, other well locations will probably be more important in the long term. Our concern is with seepage which ultimately may move eastward into North Fork Box Creek and possibly beyond the property boundary to unrestricted areas.

At the present time you are monitoring and reporting ground-water data from 19 Tailings Dam Monitor (TDM) wells, 11 of which are east of the tailings basin. Of these 11 wells, 3 have been dry since August, 1982. Moreover, the monitoring data which we have received indicates that seepage has passed several of the wells east of the tailings basin in the direction of North Fork Box Creek. We believe that monitoring wells should be located in advance of the seepage front both to validate the model used in the seepage study and to determine if and when increased pumping back to the tailings basin is warranted.

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Therefore, we are requesting that you submit a proposal to install additional ground-water monitoring wells between the existing wells east of the tailings basin and your eastern property boundary. The proposal should indicate the number and location of wells, the zone to be monitored by each well, the rationale for the location of each well, and the schedule for implementation of these wells. The proposal should be submitted to this office for review no later than December 1, 1983.

This request was discussed in an October 3 telephone communication between D. Range and D. Clark of your staff and G. Pangburn of this office. If there are any questions regarding this request, please contact George Pangburn at (303) 234-7232.

Sincerely,

/s/

R. Dale Smith, Director
Uranium Recovery Field Office
Region IV

FC	: URFO	: URFO	: URFO	:	:	:
NAME	: GPangburn	: HPettengill	: RSmith	:	:	:
DATE	: 83/09/29	: 83/09/30	: 10/13/83	:	:	: