

Umetco Minerals Corporation



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September 28, 2011

Mr. Dominic Orlando, Project Manager
U.S. Nuclear Regulatory Commission
Fuel Cycle Facilities Branch
Division of Fuel Cycle Safety and Safeguards ?
Office of Nuclear Material Safety and Safeguards
Mail Stop T-8-A-33
Two White Flint North, 11545 Rockville Pike
Rockville, Maryland 20852-2738

Subject: **Above Grade Tailings Impoundment and A-9 Repository Erosion Protection Enhancement Design Report/License Amendment**

Reference: **LicenseSUA-648, Docket No. 40-0299**

Dear Mr. Orlando,

Pursuant to the recent NRC site inspection of September 20, 2011, regarding the Gas Hills Erosion Protection Enhancement Design, Umetco would like to make the following clarifications based on field observations and discussions with Staff members:

- It was agreed that certain areas at the toe of the A-9 Repository, where natural deposition of soil material has filled (or partially filled) the voids in the existing Type C erosion protection riprap, will be treated with repair method 2 (bedding material mechanically vibrated into the rock layer) instead of the originally proposed repair method 1 (remove, bed and replace the existing rock layer). The upper/steeper portion of the slope will receive the originally proposed repair method 1. Determination of the transition point/zone between repair method 1 and method 2 will be made in the field when the existing riprap material is being removed for bedding placement and riprap replacement. Existing riprap material exhibiting excessive amounts of fines/soil in the layer matrix will be left in-place and designated to receive repair method 2. The transition point/zone between the repair methods will be surveyed and documented on As-Built drawings and the depth/condition of the riprap/bedding layer will be documented and photographed.

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- Review of in-place bedding material gradation tests indicated that on a few of the overall gradations, occasionally, one or two of the individual sieve size test results fall slightly outside of the specified gradation band limits. The individual sieve size excursions are consistently on the coarser side of the gradation band and do not affect the overall average gradation of the specified bedding materials. Each gradation test will be documented, checked for compliance with all filter compatibility criteria and replaced /resampled if found not to be in filter criteria compliance. It was agreed that occasional in-place bedding material gradation excursions (meeting the criteria cited above), can/will be considered acceptable to Staff.

Thank you for considering these matters. If you have any questions, comments or require additional information please contact me at (970) 256-8889.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas E. Gieck". The signature is fluid and cursive, with a large loop at the beginning.

Thomas E. Gieck
Remediation Leader

TEG/jfc

cc: Mark Moxley – WDEQ