



## Umetco Minerals Corporation

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970.245.3700

September 28, 2011

Mr. Dominic Orlando, Senior Project Manager  
Decommissioning and Uranium Licensing Directorate  
Division of Waste Management and Environmental Protection  
Office of Federal and State Materials and Environmental Management Programs  
U.S. Nuclear Regulatory Commission  
Mail Stop T-8F5  
11545 Rockville Pike  
Rockville, Maryland 20852

Reference: **Radioactive Materials License SUA-648; Docket No. 040-0299**  
Subject: **Request for License Amendment to License Conditions 35D and 35E**

Dear Mr. Orlando,

Umetco Minerals Corporation (Umetco) is requesting a license amendment to License Conditions 35D and 35E, U.S. Nuclear Regulatory Commission (NRC) Materials License Number SUA-648 for the former uranium mill in Gas Hills, Wyoming. The purpose of this amendment request is to make the administrative changes, as discussed during the license inspection performed on September 20, 2011, to License Condition 35D by removing Iron and Gross Alpha from the list of lower detection limits for water quality analysis. Iron and Gross Alpha analyses are not required by Appendix M of the Alternate Concentration Limits application originally approved as License Amendment 48. In addition, License Condition 35E should be deleted as it relates to Gross Alpha which has no ACL and is not required to be monitored or reported.

Umetco proposes the following modifications (underlined/strike through) to License Conditions 35D and 35E:

*D The licensee shall use, at a minimum, the following lower limits of detection for water quality analysis in mg/l, unless otherwise noted: arsenic = 0.01, beryllium = 0.01, nickel = 0.01, selenium = 0.005, total dissolved solids = 10, sulfate = 1.0, ~~iron = 0.1,~~ pH = 0.1 (standard units), natural uranium = 0.0015, combined radium-226 and 228 = 1.0 pCi/L, thorium-230 = 1.0 pCi/L, and lead-210 = 1.0 pCi/L, ~~and gross alpha = 5.0 pCi/L.~~*

*E The ACL for gross alpha for both flow regimes is based on the sum of its major contributors and not on a measured number. The ACL for gross alpha is considered to be met if the major contributing radionuclides (~~Th-230, Ra-226 + Ra-228, Pb-210~~) are all below their ACL.*

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Mr. D. Orlando  
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If you, or the staff, have any questions, please contact me at 970-256-8889 or by e-mail at [gieckte@dow.com](mailto:gieckte@dow.com).

Regards,

A handwritten signature in black ink, appearing to read "Thomas E. Gieck". The signature is written in a cursive style with a large, looping initial "T" and a distinct "E" and "G".

Thomas E. Gieck  
Remediation Leader  
TEG/esh

cc: Mark Moxley, WDEQ