



Roy Blickwedel
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40-8907

ATTN: Document Control Desk
Mr. Bo Pham, Deputy Director
Division of Decommissioning, Uranium Recovery, and Waste Programs
Office of Nuclear Materials Safety and Safeguards
U.S. Nuclear Regulatory Commission
11545 Rockville Pike
Mailstop T8-F05
Rockville, MD 20852-2738

Dear Mr. Pham:

By this letter, United Nuclear Corporation (UNC) is transmitting information concerning certain archeological sites identified at the above-referenced facility (Source Materials License SUA - 1475) to the U.S. Nuclear Regulatory Commission (NRC) in connection with a license amendment request that would allow the Licensed Repository to receive mine spoils from the adjacent UNC Northeast Church Rock mine site.

Section 2.390 of 10 C.F.R. outlines procedures that apply to requests for withholding information from public disclosure, including submission of an affidavit from an officer or upper-level management official which addresses one or more of the specified listed criteria for withholding, none of which appear to apply to sensitive archeological sites.

Notwithstanding these procedures, subsection 2.390(b)(1)(ii) specifically provides that "the Commission may waive the affidavit requirements on request, or of its own initiative, in circumstances the Commission, in its discretion, deems appropriate." For the reasons explained below, UNC believes it is appropriate to withhold the information submitted with this letter from public disclosure and thereby requests the Commission exercise the waiver in accordance with this subsection and withhold the enclosed information from public disclosure, in the interest of protecting the identified archeological sites.

UNC hereby respectfully requests that NRC exercise its discretion under 2.390(b)(1)(ii) to withhold the enclosed information marked "Confidential, Withhold From Public Disclosure Under 10 CFR 2.390," from public disclosure.

The basis for holding this information confidential is that it provides a description and identifies the location of several archeological sites and artifacts identified by UNC's cultural subcontractor. These sites are situated within a remote area and disclosure of this information would therefore increase the risk that the sites or objects found at the sites, which of are potential historical and/or scientific interest, could be disturbed, damaged, destroyed or looted by unlicensed or unregulated individuals before the sites have an opportunity to be further evaluated in a controlled fashion. Withholding of the enclosed information would permit the NRC to work with

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UNC to ensure the referenced sites are appropriately protected and that further investigation of these sites is undertaken in a controlled fashion.

Please feel free to contact me if you have any questions concerning this request.

Sincerely,

A handwritten signature in black ink, reading "Roy Blickwedel". The signature is written in a cursive style with a large, stylized initial "R".

Roy Blickwedel
Remedial Project Manager

cc: Jim Smith (via email)
Melanie Davis (via email)