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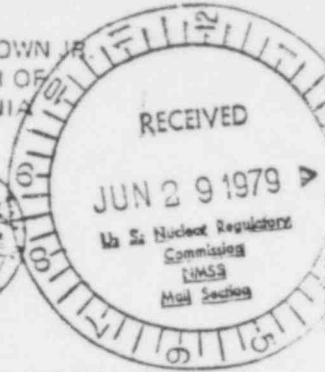
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EDMUND G. BROWN JR.  
GOVERNOR OF  
CALIFORNIA



Air Resources Board  
California Coastal Commission  
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Colorado River Board  
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State Lands Commission  
State Reclamation Board  
State Water Resources Control Board

THE RESOURCES AGENCY OF CALIFORNIA  
SACRAMENTO, CALIFORNIA

JUN 22 1979

Director  
Division of Waste Management  
Office of Nuclear Material Safety and Safeguards  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Sir:

The State of California has reviewed the Draft Generic Environmental Impact Statement on Uranium Milling, submitted to the Office of Planning and Research in the Governor's Office. We have the following comments.

The California Department of Health Services has reviewed and discussed with the Nuclear Regulatory Commission representative a preliminary draft of this document at a December 1978 meeting in Colorado Springs, Colorado. The Department has the following comments.

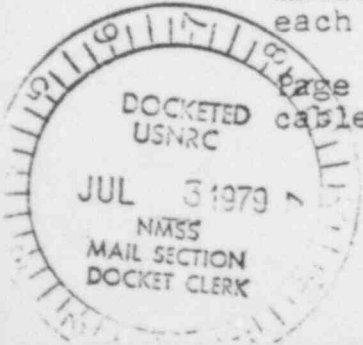
Page 2, last paragraph - In situ extraction processes have some common concerns which should be expressed in this document: radon buildup in the ion exchange chambers, dust in the drying facility, control of liquid waste ponds, and disposal and surface reclamation plans.

Page 12, last paragraph - The possibility of shipping a wet cake is increasing. There is a growth of small marginal operations and the beginning of an expansion of conversion plants to accept wet shipments.

Page 20, Section 5.2.4 - Consideration shall be given to an emergency fund to be used in event of failure of the integrity of tailings dump, i.e., flood, earthquake, or rapid disintegration of cover.

Page 24, Section 6.5 - The alternative of switching from the current disposal area to a new location will require a reclamation plan with associated controls to be implemented at each location.

Page 27, second paragraph - Another surety mechanism applicable to major companies would be self-insurance.



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Page 27, Section 8.2.2, second paragraph - A charge of \$250,000 for long-term funding seems too low for mills which have had high productivity and would pose an increased potential hazard. More frequent or expanded monitoring could be required.

Page 29, paragraphs on product levy and insurance fund - A levy of \$0.10 per pound of product could be placed in an insurance fund for unexpected expenses in remedial actions. One state has such a funding plan and limits the total contribution from any one site to \$1 million.

Page 7-2, Section 7.1.1.3 - Emphasis should be made of the serious consequences of tailings slurry reaching the water course, rather than simply referring to Section 7.1.3.

Page 8-11, Section 8.3.2.2 - The report should list additional preventive measures needed to dispose of tailings in an open pit which has cut through aquifers or water tables.

Page 8-11, Section 8.3.2.3 - The liquid portion of the tailings slurry could be injected into deep brine wells to hasten the separation of the solids at the initial disposal pond. An acceptable well would have a total dissolved solids value of 10,000 ppm or greater.

Page 12-1, Section 12.2.1, technical siting No. 2 - A preferable alternate disposal location would be at the top of a shallow canyon where a downstream dam would be easy to construct and wind factors would be minimized.

Page 12-2, Section 12.2.1 paragraph No. 6 - Better understanding and guidance of limitations and restrictions are needed before one considers disposal involving contact with ground water.

Page 12-3, paragraph 9 - Decontamination of buildings and site shall [not must] be accomplished to the levels allowing unrestricted use, etc. ---.

Page 14-3, paragraph 4 - All decommissioning activities are leading to a favorable compliance determination so that the primary emphasis is toward the reduction of hazards and perfecting controls and revegetation. The drying period before use of heavy equipment may be short when compared to other actions.

Director  
Division of Waste Management  
Page 3

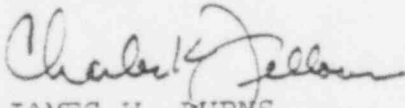
The Department of Conservation is concerned that the report provides no assurances that radioactive material from mine tailings would not cause long-term detrimental effects to groundwater quality. Complete isolation of radioactive wastes should be required, and tailings ponds should not be placed in or near aquifers unless isolated by impervious material or have subdrains which would intercept any seepage until the ponds are dewatered.

On page 20 of Vol. I., it states, "Although in general, the preferred approach towards groundwater protection is isolation of tailings and tailings solution, the staff does not consider complete prohibition of disposal in groundwater appropriate. The conservative approach of providing isolation may be unnecessary where it can be demonstrated that on the basis of site-specific conditions and with tailings treatment, groundwater quality can be preserved." This is not consistent with the discussion on long-term seepage (page E-20, Vol. II), which acknowledges that the chemistry of seepage water draining from the tailings is difficult to predict.

The State's review, which fulfills the requirements of Part II of Office of Management and Budget Circular A-95 and the National Environmental Policy Act of 1969, was coordinated with the Departments of Conservation, Fish and Game, Food and Agriculture, Health Services, Parks and Recreation, and Water Resources, the Air Resources, Solid Waste Management, and State Water Resources Control Boards; and the Public Utilities, and State Lands Commission.

We appreciate having been given an opportunity to review this project.

Sincerely,

  
JAMES W. BURNS  
Assistant Secretary for Resources

cc: Director of Management Systems  
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