



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

May 8, 1979

MEMORANDUM FOR: Guy A. Arlotto, Director  
Division of Engineering Standards  
FROM: Al Kenneke, Acting Director, OPE  
SUBJECT: LICENSING REQUIREMENTS FOR URANIUM MILLS (DRAFT OF 4/27/79)

OPE concurs in the plan to publish the proposed rule as recommended in the draft paper.

In reporting our concurrence we want to call attention to the fact that in our view the draft GEIS -- and hence also the proposed rule -- have not fully settled the question of the proper basis for taking into account the very long term effects. The uncertainties and difficulties posed by that issue will need to be addressed further before a final rule is promulgated. We believe that the benefits and costs of options for dealing with the long-term effects can well be addressed in the light of the proposed rule's guiding principle, viz., that "tailings should be isolated from people and the environment in such a manner as to reduce potential exposure to as low as is reasonably achievable." (Enclosure A, page 11.) Public comments on the proposed rule and on the uranium milling GEIS, as well as the S-3 update efforts, may contribute information and views that could be helpful in a reexamination of the terms of the proposed rule, as well as in developing interpretive guides and review plans. The most appropriate set of requirements for obtaining adequate assurance against future uncovering of tailings should be an emphasized part of that reexamination.

cc: Leonard Bickwit

CONTACT:  
George Sege (OPE)  
634-3302

79101 00107.

877-356