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JAN 30 1980

Dr. Minton Kelly
Oak Ridge National Laboratories
Bldg. 4500 N Mail Stop D016
P. O. Box X
Oak Ridge, Tennessee 37830

Dear Minton:

I have reviewed the Nine Mile Lake Project (Rocky Mountain Energy Company) Preliminary Draft Environmental Statement (PDES) working draft you submitted to the staff. Since you are currently writing the PDES of the Ogle Petroleum Company Bison Basin Project, I have reviewed the Nine Mile Lake working draft to determine what changes in organization or information content should be made for the Bison Basin PDES. The following are the comments you and I discussed on January 28, 1980. They should be included in preparing the Bison Basin PDES:

1. In Section 2.3.9.1, provide more detail on injection and recovery well mechanical integrity, that is, hydrostatic pressure tests, cement bond logs, geophysical logs, etc.

2. Briefly justify the limits of injection pressures. If possible, identify a reference for estimating regional fracture pressure. To be specific, regional fracture pressure of sandstones in Wyoming calculated from other in situ operations is about 0.8 psi/ft. depth, if there is a study that came up with this number, identify it.

3. Wherever possible, use results of the Ogle pilot study (from the quarterly reports) particularly when characterizing wastes or discussing ore zone restoration.

4. Page 2-46 of Nine Mile PDES states that the restoration criteria is premining use. NRC policy is restoration back to baseline or as close to baseline as is reasonably achievable on a parameter by parameter basis. In other words restoration in the Bison Basin Project will be to premining use or potential use.

5. Page 2-47, third paragraph, says that "theoretical studies" indicate restoration is more efficient when using water of quality higher than baseline. Cite references

6. Include detailed discussions of disposal plans, groundwater monitoring and atmospheric emission monitoring.

7. Shorten discussions not related directly to the Bison Bason Project, such as the discussion on national energy policy. Since socio-economic impacts are not as significant as environmental impacts, also shorten the section on the socioeconomic profile.

8. In section 3, make sure the descriptions of the groundwater system is complete, including mention of structures that could affect the flow such as the faults, permeabilities, transmissivities, storage coefficients, nature and continuity of the conforming beds, lateral extent, thickness, potentiometric levels and gradients.

9. Since the aquifers will be restored to potential use on a parameter by parameter basis give more details on the premining groundwater quality; for example, metals may be comparable in concentration to drinking water but radium in the ore body may exceed standards for irrigation.

10. In Section 3.7.1.2, identify the location of the nearest known fault.

11. Include site geologic map and a crosssection to enhance the discussion of geology.

12. In Section 4.2.3.2, be sure to discuss the impact of excursions separately from the impact of mining and restoration.

13. Wherever possible, cross reference between the sections discussing impacts, monitoring and site-operating description.

Please contact me if you have any questions.

Sincerely,

Original Signed by

R. S. Kaufmann
Uranium Recovery Licensing Branch
Division of Waste Management