

DCS



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

APR 25 1980

MEMORANDUM FOR: Ross A. Scarano, Chief
Uranium Recovery Licensing Branch
Division of Waste Management

THRU: John J. Linehan, Section Leader
Operating Facilities Section
Uranium Recovery Licensing Branch

FROM: Peter J. Garcia
Operating Facilities Section
Uranium Recovery Licensing Branch

SUBJECT: MEETING MINUTES FOR MEETING WITH ATLAS
MINERALS -- DOCKET NO. 40-3453

Purpose

To discuss Atlas riprap design, open correspondence, and their response to an NRC information request dated February 19, 1980.

Place and Date

USNRC, Silver Spring, Maryland, March 19, 1980.

Attendees

NRC - P. Garcia, WMUR
T. Johnson, NRR

Atlas - R. Alcock
G. Swanby

Summary

The meeting began with a discussion of NRC's request for information dated February 19, 1980 on Atlas' proposed Moab Wash riprap design. Atlas felt that the requirement for a toe on the riprap was not warranted, and that in general the design criteria were ultra-conservative. They stated further that the requirement to place the riprap and toe within the time frame specified (approximately two years from now) in license condition 16 of their license would result in severe financial hardship for Atlas.

Atlas then hand delivered a copy of their response dated March 13, 1980, to NRC's request for information dated February 19, 1980. In addition to written arguments concerning the "ultra-conservative" nature of the NRC position, Atlas proposed in the response merely strengthening one relatively weak section of existing riprap. We informed Atlas that we would respond to their letter following discussions with our management.

8007150076

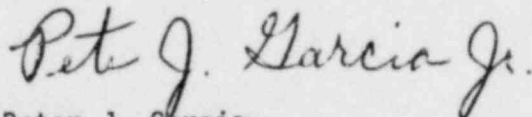
APR 25 1980

Atlas then discussed the possibility that Moab Wash had originally been diverted so that its confluence with the Colorado River was now located further upstream than it originally had been in order to make room for the mill. This statement is based on the fact that the current confluence is located at a higher elevation than the hypothetical confluence and that for the Wash to reach the current confluence requires a sharp change in course. Atlas then suggested that, if indeed the Wash had been diverted during mill construction, it might be possible to return the Wash to its original position at decommissioning time and use the building foundations as riprap. However, Atlas had not yet checked their files to attempt to ascertain whether Moab Wash had indeed been diverted.

The discussion then turned to two open items on which the NRC staff is currently formulating responses to Atlas submittals. The first involves the issue of bonding for reclamation. We informed Atlas that we had not responded to their October 19, 1979 letter on the subject because we had been awaiting a legal interpretation by ELD on the subject of NRC holding bonds. We informed Atlas that we have recently received that legal interpretation, and will transmit a letter to them in the very near future concerning surety arrangements. The second item is an additional raise on the tailings embankment which has been requested by Atlas. We stated that, because additional analyses and an alternative study would be required, we would have to reclassify Atlas' request from an administrative amendment to a major environmental and safety amendment. We will send Atlas a letter formalizing the discussions on this matter in the near future.

The meeting then closed with a brief, final discussion about Moab Wash. Atlas stated a desire to reach a solution to the Moab Wash issue which is acceptable to both Atlas and the NRC.

No new commitments or agreements resulted from this meeting. A condensed set of meeting minutes, which is attached, was written following the meeting and was read and signed by G. Swanby, Atlas, and P. Garcia, NRC.



Peter J. Garcia
Uranium Recovery Licensing Branch
Division of Waste Management

Enclosure:
Condensed Set of Meeting Minutes

Meeting Between Atlas Minerals and NRC
March 19, 1980

Purpose: To discuss Atlas riprap design and
their response to information request
from NRC dated February 19, 1980.

The meeting began with a discussion of
riprap criteria. Atlas felt that the
requirement for a toe on the riprap was not
warranted. NRC informed Atlas that, although
we would broach the subject with our
management, we did not expect the criteria
to change. Atlas then presented a ^{letter} response ^{dated} 3-13-80
to NRC's request for information. They
proposed strengthening the critical area of
Moab Wash with riprap, and then maintaining
the existing riprap during operation. ~~Final~~
~~riprap would be placed upon mill decommissioning.~~
We informed Atlas that we would discuss the
proposal with management, but that at the
least, additional bonding to cover the cost
of riprap installation would be required.
We then informed Atlas that we would be
transmitting to them shortly a letter on
bonding. ^{letter on bonding} Finally, Atlas discussed the possibility
of ~~fully~~ diverting Moab Wash ~~decommissioning~~.

no new commitments or agreements resulted
from this meeting.

We informed Atlas that it is our position
that final riprap be installed prior to
mill decommissioning.

POOR ORIGINAL

Pete J. Garcia Jr.
NRC

G. L. Swarley