



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

DCS

JUL 03 1980

WMUR:DMG
Docket No. 40-4492

Federal-American Partners
ATTN: Mr. Gene W. Pierson
Director of Technical Services
Gas Hills Star Route
Riverton, Wyoming 82501

Gentlemen:

Enclosed you will find questions and requests for additional information based on our review of your Environmental Report and supplement on subsurface tailings disposal. In addition, we are submitting an information form entitled "Principle Parameters for Radiological Assessment" to be completed based on the revised expansion throughput of 2000 tons per day. We are also including for your information a copy of our draft regulatory guide entitled "Calculational Models for Estimating Radiation Doses to Man from Airborne Radioactive Materials Resulting from Uranium Milling Operations."

Responses should be submitted to the NRC and to those on the Environmental Report distribution list no later than August 1, 1980. If you wish to discuss this request, please contact Mr. D. Gillen (301/427-4103) of my staff.

Sincerely,

A handwritten signature in cursive script, appearing to read "John D. Zinsler".

for Ross A. Scarano Chief
Uranium Recovery Licensing Branch
Division of Waste Management

Enclosures: As stated

cc: Mr. Emerson Kemp

8007230050

A handwritten mark resembling the letter "C" or a similar symbol.

FEDERAL-AMERICAN PARTNERS
REVIEW OF ENVIRONMENTAL REPORT
REQUEST FOR ADDITIONAL INFORMATION

Socioeconomics

1. Provide details on mill and mine employment and the source of personnel with some emphasis on the company camp.
2. Describe current and projected transportation facilities for commuting and transportation to and from the mill. State the condition and construction of roads.
3. Provide a more detailed construction schedule for mill expansion and below grade tailings disposal. Also include the expected employee numerical breakdown by time period, source of employees, and place of residence while employed.
4. Provide information on state land ownership in permit area (break-down from general categories of federal, state, private). Profile and project land use for mill and associated mines now and after expansion.
5. Provide an estimation of tax revenues generated directly and indirectly now and after expansion, including employment and multiplier (both family and service) effects; estimation of external costs to political units (in public expenditure) due to these operations and also of any major external costs borne privately; notation of any mismatch between political units receiving taxes and those incurring expenditures and tax powers and structure of political units.
6. Provide a list of any impact mitigation efforts volunteered by applicant or required by political units, in particular any financial assistance which may reasonably be used for all phases through decommissioning; statement of social and economic aspects of any "post-decommissioning scenarios"; list of severance tax rates to the county and state and their basis.
7. Provide a thorough description of "Company Village". In particular: population, political structure or community, desire, if any, of residents to live elsewhere if other arrangements could be made (with costs and benefits of other arrangements), management views of the towns likely impact from enlarged mill, etc.
8. What utilities serve the Gas Hills area? Do those utilities have excess capacity adequate to meet the additional demand due to the increase in mill capacity and increase in mining to feed the new capacity?

Aquatic Ecology

9. Provide a figure that combines a better copy of Figure 2.7-2 (Area Water Well Locations) with a figure locating existing and proposed monitoring wells in the site area.
10. Do any ephemeral streams receiving site drainage contain permanent pools? If so, state the location relative to the site and provide a list of organisms found therein.
11. Provide a more detailed map of the area that includes appropriately labeled waterways. In particular, the Sage Hen Creeks and Diamond Springs should be labeled.
12. Provide an estimate of quantities and type of sediment in site runoff during periods of high flow. Describe and locate any sediment control structure in the Muskrat Creek drainage. Estimate the probability of sediment in site runoff reaching fish bearing waters.
13. Provide a list of fish currently found in the Wind River drainage area.
14. References, Section 2.9. What is the date of the Bond and Straub reference?
15. Section 3.2 (page 3-1). Is the mill expansion location still as shown on Figures 3.1-1, and 3.4-1? Is the interior layout as shown on Figure 3.2-1? Describe local site drainage control after construction.
16. Section 3.3.6 (page 3-11). Will the Solar Evaporation Pond contain only water decanted from the below grade tailings disposal area? Estimate the chemical and radioactive concentrations in this ponded water. Describe the "excess process water disposal system".
17. Section 3.4.3 (page 3-17). Where will water for dust control be obtained? Discuss alternative methods of erosion control.
18. Table 3.4-1. Seepage estimates range from 13 gpm for the entire system (Section 5.3) to 13 gpm for each of two ponds (Section 3.5.1.1). Table 3.4-1 states negligible seepage from tailings area with 13 gpm from the solar evaporation pond. Clarify by calculating seepage rates.
19. Section 3.5.1.5 (page 3-21). Describe methods to be used for diversion of surface runoff from the below grade tailings disposal site.
20. Section 4.4.2 (page 4-4). Describe measures to prevent sediment in runoff from the construction site from entering the local drainage.

21. What is the total capacity of the aquifers from which FAP draws its water? What effects will the increase in mill capacity and the increase in mining to feed the new capacity have on the local water tables?

Terrestrial Ecology

22. To what extent have the tailings ponds been used by waterfowl? Have any steps been taken to prevent such use? (Section 2.9.2.8)
23. By what government agency is Artemisia porteri (ER, p. 2-25) listed as threatened? How much suitable habitat, as described in the ER, is present on the lease, and how much would be disturbed by the proposed expansion? Provide the results of a specific search for this and any other endangered or threatened species in areas that could be impacted by the proposed action. (Section 2.9.1)
24. Please revise the list of state and federally endangered and threatened species to show only those which are currently listed or proposed and which could be present. The 1974 threatened and endangered species pamphlet has been obsolete since 1975. The only threatened or endangered species in Wyoming are those federally listed.
25. To what extent are the proposed activities likely to disturb or endanger bighorn sheep (p. 2-43)? What actions, including consultation with state officials, have been or will be taken to limit such effects? (Section 2.9.2)
26. How much additional existing antelope and deer range will be made inaccessible by the proposed action? What problems have been encountered with game mortality resulting from road kills, poaching and fencing? How much is this expected to increase? What measures have been or will be taken to limit such effects? (Section 2.9.2)
27. How much of each of the various vegetation types will be disrupted by the tailings pipeline?
28. For the various game censuses mentioned (e.g., Antelope p. 2-40, mule deer p. 2-42) please provide (1) the year and month in which taken (2) by whom taken, (3) literature citation. (Section 2.9.2) It appears that more current population data may be needed. Consultation with the District Biologist in Lander to obtain updated information is recommended.
29. Please list the contacts that have been made with the Wyoming Game Commission regarding impacts of this project on management of game in the area. (Section 2.9.2)
30. In general, the species lists are not site specific and should be revised. It is recommended that the Wyoming Game and Fish Department be contacted for their assistance in providing reasonable species lists and data sources pertinent to this project.

Reclamation

31. Of the several types of soil present on the site, how much of which soils will be used for reclamation? To what depth will soil be spread? How will topsoil be protected during storage? (Sections 9.3 and 9.2)
32. Please provide a copy of Final Contour Map 5, referenced on p. 9-6 of the ER. (Section 9.3.9.1)
33. The proposed seeding mixture (Table 9.3-2) lists only one species each which is browse for antelope or mule deer. In view of the acknowledged importance of the area to these animals, explain why additional browse species are not included. In particular, why will no sagebrush seedlings be put in? (Section 9.3.9.4)

Air Quality

34. The ER states that fugitive dust from haul roads and ore piles will be controlled "whenever necessary" (p. 3-22). How will the necessity be established? During operations, where will TSP sampling stations for this site be located? (Sections 3.5.2.1 and 2.11)
35. Provide an estimate of the increase in Total Suspended Particulates resulting from construction and expanded operations, including an indication of where maximum concentrations will occur. (Section 3.5.2)

Land Resources and Land Use

36. Written clearance from the State Historic Preservation Officer will be required for this project. (Section 2.4.1)
37. Written verification from the Soil Conservation Service that there are no prime or unique farmlands on the site is required. (Section 2.5.2)