



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
URANIUM RECOVERY FIELD OFFICE
BOX 25325
DENVER, COLORADO 80225

OCT 24 1989

URFO:GRK
Docket No. 40-8903
SUA-1471
04008903300E

Homestake Mining Company
of California
P.O. Box 98
Grants, New Mexico 87020

Gentlemen:

Our office is in receipt of your September 15, 1989 amendment request. It is our understanding that your submittal was in response to License Condition No. 35 which was modified on May 18, 1989. The cover letter for this licensing action addressed the following issues requiring a Homestake response:

- ° Submit a corrective action program per 10 CFR 40, Appendix A, Criteria 5.
- ° Submit a ground-water monitoring program that is sufficient to characterize the entire site. We would suggest the program specified in Section 8.0 of the December 1988 submittal with incorporation of appropriate hazardous constituents.
- ° Explain the chromium differences between the Homestake Mining Corporation Lab and Barringer Lab, as shown in the March 15, 1989 submittal.
- ° Determine the extent and concentration of hazardous constituents that meet the discussion in Criterion 5B(2)(a, b and c).
- ° Propose points of compliance for the inactive tailings impoundment.

All of these issues were to be resolved within your current submittal, with the exception of determining the extent and concentration of hazardous constituents. This matter is due a response on or before January 1, 1990.

We have reviewed your ground-water monitoring proposal and find that it is comprehensive and will adequately characterize the ground water at the site. Previous discussions that this office has had with the State of New Mexico indicate that they view the monitoring program favorably. Similarly, we are pleased to see that the chromium inconsistencies have been resolved.

Your corrective action program discussion centers on the injection of water combined with the subsequent removal of waters, thereby creating a hydraulic

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fence. These water movement operations are complimented with the removal of uranium from the recovered water as well as traces of some metals. You will note that our May 18, 1989 letter indicated that some type of system would be needed to "truly immobilize" hazardous constituents. Your current recycling system does not remove or treat the hazardous constituents in place as specified in 10 CFR 40, Appendix A. Please provide our office with a proposal to remove or treat in place the hazardous constituents specified in your license. Considering your decision to indefinitely suspend operations at the site, dewatering of the tailings should be factored into your corrective action program.

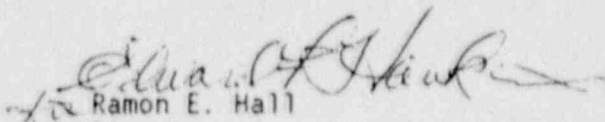
Our May 18, 1989 letter requested that Homestake propose point of compliance well locations for the inactive tailings. In addition to this, your proposal requested modification of the existing points of compliance for the active tailings impoundment. Your proposed points of compliance, specifically WP11, WR7, E and PM, do not meet our definition of being located at the hydraulically downgradient edge of the disposal area. We have taken into consideration your proposed reclamation cover outcrops and determined that the ultimate downgradient edge of the disposal area will extend roughly 400 feet from its current position. Due to this, adequate points of compliance should be located not more than approximately 400 feet from the existing impoundment toe. Should Homestake choose to pursue a license amendment, this siting criteria will need to be met. Well G appears ideally located to judge compliance on the inactive tailings. We would however recommend that an additional point of compliance be established in the vicinity of well X.

To summarize and avoid future confusion, the following ground water issues remain unresolved at your site:

- ° Submittal of a corrective action program which removes or treats in place the hazardous constituents identified in your license. Additionally, tailings dewatering should be incorporated in this proposal.
- ° Propose an additional point of compliance well for the inactive tailings.
- ° Resubmit a proposal to modify the point of compliance locations to wells at the toe of the reclaimed tailings outslope.

Please respond to these issues on or before November 24, 1989. Should you have any questions, please directly contact Gary Konwinski of my staff.

Sincerely,


Ramon E. Hall
Director

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Docket File 40-8903

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PGarcia

RCPD, NM


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CONCURRENCE:

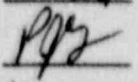
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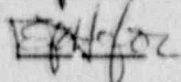
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