

Mr. R. A. Scarano, Branch Chief Uranium Recovery Licensing Branch Division of Waste Management J.S. Nuclear Regulatory Commission Washington, D.C. 20555 Applicant.
Check No. 2941.
Amount, Fee Category 7674 - 240L 1115
Type of Fee. 2010
Date Check Rec'd. 2/JAF.2

Dear Sir:

Re: Docket No. 040-08714, Source Materials License No. SUA-1352

This letter is to request a Minor, Safety and Environmental Amendment to Source Materials License No. SUA-1352. The Minor, Safety and Environmental Amendment is requested to change Source Materials License No. SUA-1352, Condition 10 to incorporate the additional information transmitted in this letter.

The Cleveland-Cliffs Iron Company (Cliffs) requests the approval to test oxygen and/or hydrogen peroxide with the ammonium carbonate lixiviant to oxidize and liberate the uranium from the mineralized sand and requests approval to incinerate waste paper and waste cardboard at the Collins Draw In-Situ Uranium Mine.

Currently the Source Materials License permits the testing of hydrogen peroxide but not oxygen. When permitted, the oxygen will be used both independently and in conjunction with hydrogen peroxide.

The primary difference between the use of oxygen and hydrogen peroxide is cost and not the chemical properties. Hydrogen peroxide rapidly (several hours) breaks down to form water and oxygen as shown below:

 $2H_2O_2$ $2H_2O + O_2$

Liquid oxygen will be stored in a mobile storage tank in the well field area. The tank will be leased from the oxygen supplier and will be properly designed for liquid oxygen storage. The oxygen will be injected into the well field as a gas.

The net effect of adding oxygen to the pilot test described in License No. SUA-1352 is the addition of the oxygen storage tank. No chemical changes are foreseen in the well field area or the uranium recovery plant area resulting from the use of oxygen and/or hydrogen peroxide as the primary oxidants for in-situ uranium liberation.

The impact on the environment will be the same for oxygen as that for hydrogen peroxide as described in License No. SUA-1352. Leaks or spills due to equipment failure will be quickly dispersed into the atmosphere.

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Cliffs requests amendment to permit the incineration of waste paper and waste cardboard at the Collins Draw Site. The waste to be burned will be generated by the solution mine and by the operating crew living in a nearby off-site house. Approximately four 55-gallon drums, or 1.1 cubic yards, of uncompacted waste paper and waste cardboard are produced each week. Presently this material is being disposed of on-site in an industrial solid waste disposal site permitted by the Solid Waste Management Division, Wyoming Department of Environmental Quality. However, the waste paper and cardboard do blow around if not immediately covered with backfill material and do account for the majority of the volume in the disposal site. In order to decrease the volume of waste deposited in the disposal site and therefore increase the lifetime of the facility and to decrease the waste paper in the disposal site, Cliffs requests permission to burn the waste. The burning would be scheduled for Tuesday and Thursday mornings. The waste would be burned in one or two 55-gallon steel drums.

A parallel request for a permit amendment to burn waste paper and cardboard has been submitted to the Air Quality Division, Wyoming Department of Environmental Quality.

It is requested that Condition 10 be rewritten to include this additional information transmittal as follows:

10. Authorized Use:

For uranium recovery from uranium solution extraction studies in accordance with statements, representations and conditions contained in (1) the licensee's application dated November 3, 1978, and supportive information attachments; and (2) additional information transmittals dated January 16, 1979; March 21, 1980; May 7, 1980; and July 14, 1980.

A check for \$760 is enclosed for the Source Materials License, Minor, Safety and Environmental Amendment fee.

If you have any questions concerning this request for an amendment to Source Materials License No. SUA-1352, or if we may provide additional information, please contact me personally at your earliest convenience.

Sincerely,

THE CLEVELAND-CLIFFS IRON COMPANY

Druman & Louderbach Truman E. Louderback

Director of Environmental Affairs

XC: Region IV, Office of Inspection and Enforcement U.S. Nuclear Regulatory Commission 611 Ryan Plaza Drive - Suite 100 Arlington, Texas 76012 . Mr. R. A. Scarano July 14, 1980 Page 3

xc: Dennis Morrow, Wyoming Department of Environmental Quality

TEL:bn

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