

Union Oil Company of California
1846 W. Grant Road, Suite 105
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Telephone: (602) 884-8073

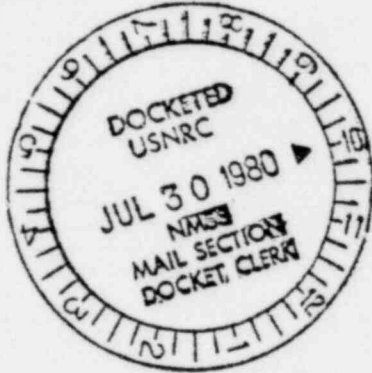


UNION 76



March 31, 1980

Head Office
P.O. Box 7600
Los Angeles, California 90051
(213) 466-6929



Mr. John Linehan, Section Leader
Uranium Recovery Licensing Branch
Division of Waste Management
U.S. NUCLEAR REGULATORY COMMISSION
1791 S. Eastern Avenue
Silver Spring, Maryland 20910

RE: Docket No. 40-2348
SML No. SUA-1223
Control No. 14851

Dear Mr. Linehan:

This refers to a January 31, 1980, letter from NRC notifying us that the October 26, 1979, Synopsis on the status of our R & D in situ project was to be considered as an amendment to our license. In addition, the letter requested a fee of \$760 to process the "amendment".

As you are aware, I have verbally questioned the reason for considering the October 26, 1979, Synopsis as an amendment. We have documentation in our project files to show this Synopsis was provided as a result of NRC requests. Does answering a request constitute an amendment?? To compound the situation, since NRC had not replied to the Synopsis, I included the decommissioning portion of the Synopsis in the application to renew Source Materials License No. SUA-1223. This renewal request was submitted on January 15, 1980, and was followed with the standard fee of \$17,311. Since the Synopsis has actually been made part of the renewal application, it is not proper to redesignate the Synopsis as an amendment and charge additional fees at this time. Had NRC replied before the January 1980 renewal to the Synopsis in a timely manner I could understand the January 31, 1980 request.

I would like to request the following at this time:

- 1) A reply on the October 26, 1979 Synopsis.
- 2) A review of the amendment designation of the October 26, 1979, Synopsis fee assessment.
- 3) A renewal schedule for the application to renew License No. SJA-1223. All that remains to close out this project is final decommissioning as described in the renewal application. Since we want to do the work this summer, a response on the decommissioning plans by NRC is necessary.

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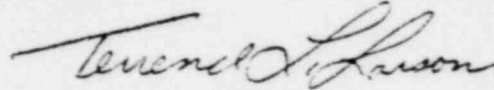
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If NRC decision letter is a denial of this request please advise the appeal process authorized by the NRC for agency review of adverse decisions.

Very truly yours,

UNION ENERGY MINING DIVISION



Terrence L. Larson
Environmental Engineer

TLL/mlm

c: J.A. Abramo
P.C. Carlos
G.D. Bennett
W.C. Goth

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