

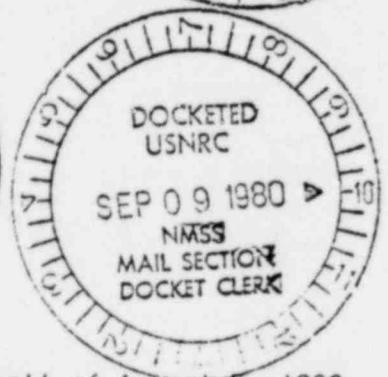
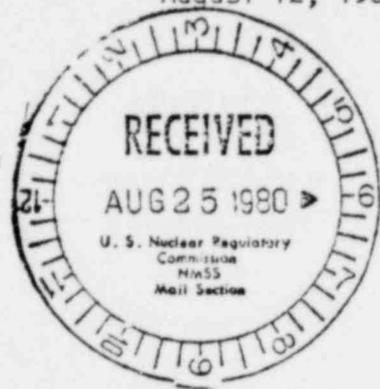
PDR

40-8380

ROCKY MOUNTAIN ENERGY COMPANY



August 12, 1980



Mr. J. E. Rothfleisch
U.S. Nuclear Regulatory Commission
Uranium Recovery Licensing Branch
Willste Building
7915 Eastern Avenue
Silver Springs, MD 20910

Dear Mr. Rothfleisch:

This letter is in response to your telephone call of August 5, 1980 concerning the Effluent Monitoring Report for Nine Mile Lake which was submitted July 31, 1980. As you pointed out, License No. SUA-1228 has not been renewed as of this writing. The report should have said that renewal of the license was applied for in February 1980.

Enclosed is Revised Table 1 which describes Pattern III water quality during the report period (January 1, 1980 - June 30, 1980). Presented in the table are the ranges of values, the mean for each parameter (\bar{x}), the upper control limit (UCL) for each parameter and the value at the close of the report period for the excursion control parameters. Please note that although the mean for some uranium and vanadium values exceeds the respective UCL for that parameter, the mean does not reflect the movement of these parameters toward baseline conditions during the middle and latter portion of the report period. The attached graphs provide a more accurate illustration of the overall trend in water quality. Note that the sampling frequency and corresponding number of data points decrease on the graphs as time progresses. This is because of the reduced sampling frequency implemented as the excursion was deemed "controlled".

Analysis of the graphs shows that uranium and vanadium levels in all the pattern monitor wells have stabilized at less than one part per million. It is also important to note that this data represents water quality within the zone of influence of the pattern production well and should not be construed as an effluent discharged from the restricted area boundary.

As I mentioned during our telephone conversation, 10 CFR part 65 which requires the semi-annual Effluent Monitoring Report, is of dubious capability to an ISL operation. The referenced section is also vague as to what information should be included in the report. The format which has been used for this report in the past was a result of specific instruction from Dr. Cooperstein, formerly with the NRC. If this report format is unacceptable to the NRC, we request that the NRC provide us with specific guidance as to an acceptable format.

FEE EXEMPT

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Should you have any questions, please contact either Rick Iwanicki or myself.

Sincerely,

Michael L. Neumann

M. R. Neumann
Field Environmental Coordinator

MRN/je

Attachments

cc: NRC, Region IV
NRC, Director of Inspection and Enforcement
Russ Hynes
Kent Loest
Pat Spieles
Debra Murphy
Rick Iwanicki