PDR 40-8745

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September 15, 1980

Mr. J. E. Rothfleisch
Uranium Recovery Licensing Branch
Division of Waste Management
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

RE: Commercial Source Material
License Application, Docket
No. 40-8745

Dear Mr. Rothfleisch:

During the month of July, 1980, Mr. Ron Kaufmann and myself verbally discussed certain items in Ogle Petroleum Inc.'s (OPI) Draft Environmental Statement (DES) that we felt might need changing. On August 7, 1980, I met with you and Mr. Kaufmann in the NRC offices in Washington, D.C. and we discussed these same items and made notes of the changes that were being considered. The following is my understanding of our previous discussions:

1. Page iii, Item No. 2, and Page 1-2, Section 1.2, First Paragraph.

This section states that OPI will produce uranium at a rate not to exceed 1.8×10^5 kg/yr (4.0×10^5 lb/yr). Neither the application form nor the Environmental Report (ER) stated that OPI would produce no more than 1.8×10^5 kg/yr (4.0×10^5 lb/yr). The application form states that OPI will not have more than 1.8×10^5 kg/yr (4.0×10^5 lb/yr) in its possession at any one time. It does not say that production shall not exceed 1.8×10^5 kg/yr (4.0×10^5 lb/yr). OPI strongly desires to not be arbitrarily limited as to yearly production. The head grade (uranium concentration) in the 1,200 gallon per minute production stream may be higher than the estimated 82 ppm resulting in more than 1.8×10^5 kg/yr (4.0×10^5 lb/yr) of production.

2. Page v, Item h.

The item lettered h does not seem to belong with this portion of the DES.

3. Page v, Item h.

Geologic information (including cross-sections, structure map, sandy horizon map, etc.) was submitted on the entire orebody not just the first mining unit. As such, OPI does not understand the requirement for additional geologic information.

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4. Page vii, Item 7, Second Paragraph.

It is OPI's understanding that this statement is being rewritten as per discussions between Mr. Rothfleisch, NRC, and Mr. Catchpole, OPI.

5. Page 3-16, Section 3.6.1, First Paragraph.

Typographical error - 25 m ≠ (18 ft). 25 m is correct.

6. Page 4-9, Section 4.4.2.5, Trend Wells.

OPI did not propose in the ER (and does not intend) to use trend wells.

7. Page 4-10, Section 4.4.2.5, Monitor Well Sampling and Upper Control Limit.

It is OPI's understanding that these two subsections will be rewritten to conform to the Wyoming DEQ Permit.

8. Page 4-11, Section 4.4.2.5, Post-Restoration Monitoring.

It is OPI's understanding that this subsection will be rewritten to conform to the Wyoming DEQ post-restoration monitoring program.

9. Page 4-11, Section 4.4.2.5, Post-Mining Monitoring.

It is OPI's understanding that this subsection will be deleted as it is redundant of the post-restoration monitoring program.

10. Page 4-28, Section 4.6.2.1, Transportation Accidents, First Paragraph and Page 2-32, Section 2.3.10.2, Product Preparation Area.

The yellowcake slurry may be shipped to other than Kerr-McGee in Gore, Oklahoma. It may also be shipped to a conventional uranium mill(s) in the Rocky Mountain region.

11. Page 4-30, Section 4.6.3.

It is OPI's understanding that we will be given one year to attempt to find a company that will allow us to dispose of our radioactive waste in their tailings pond. If, a[illegible] year, OPI can present written documentation that no company within a[illegible]le distance will accept the waste, on-site disposal will be allowed consistent with the mining and milling waste disposal objectives discussed in Section 2.3.6.

12. Page 4-31, Section 4.8.2, Land Use.

OPI does not believe that ranchers will be inconvenienced by the project. Experience to date with the R & D project shows that such is not the case.

13. Page 2-31, Section 2.3.10.2, Elution Circuit.

OPI has made a minor design change in the elution circuit. Originally, it was planned to transfer resin between the loading (adsorption) columns and the elution columns. OPI now plans on using expanded bed ion exchange columns and eluting in-place with no transfer of resin between ion exchange columns. In view of this change, it is suggested that paragraph number 2 of the above referenced subsection be rewritten as follows:

> The Bison Basin Project will use expanded bed ion exchange columns. As a column becomes loaded with uranium, it will be eluted in place. No transfer of resin between columns will take place. The elution step reverses the ion exchange reaction, forcing the uranium from the resin and replenishing the resin with a replacement ion such as chloride or another similar ion. After a column is eluted, the resin is rinsed and the column is again ready to begin loading uranium. The rinse solution is discharged to the evaporation pond.

It is suggested that the first sentence in the third paragraph be rewritten as follows:

> The solution leaving the column that is being eluted contains uranium . . .

It is suggested that the last sentence in the fifth paragraph be rewritten as follows:

> The fresh eluant is then ready for recycling to the next ion exchange column to be eluted.

Enclosed is revised Figure 2.8 (page 2-30 of the DES) that incorporates the above mentioned changes.

14. Page 4-7, Section 4.4.2.3, Waste Pond Monitoring.

During a meeting between the NRC and OPI on July 29, 1980, the NRC requested that more information be provided on the waste pond monitoring; specifically, what parameters will be monitored and how soon will the NRC be notified if a leak is confirmed. The Wyoming DEQ also requested more information on this aspect of the operation; and as a result, OPI revised the State DEQ application. The revised pages that cover the evaporation pond monitoring program are contained in the approved State application that is in your possession. The pages in the State application that cover this issue are numbers 196, 196A, and 197

(copies enclosed). It is requested that the NRC use the same parameter list and reporting procedure that the State has approved and that the parameter list and the procedure for reporting a leak be the same for both the pond monitor wells and the pond standpipes.

Please feel free to contact me at our Casper office if you have any questions or comments in connection with these matters.

Sincerely,

OGLE PETROLEUM INC.

Glenn J. Catchpole
Project Manager

GJC:jm

Enclosures

CC: Dr. Minton Kelly, ORNL, w/Enclosures (5 copies)
Document Management Branch w/Enclosures (1 copy)

The location of the excursion monitor wells for Mining Unit No. 1 are shown on Figure 15-7, page 177.

The water level in each well used to obtain baseline data will be measured on each sample collection event prior to pumping the two casing volumes. The water level data will be forwarded with the water quality data.

The baseline water quality data already collected within the permit area are presented in Section 14.1 (Appendix D-11) "Baseline Water Quality".

16.1.1.3 Excursion Well Monitoring During Mining

The production zone and non-production zone aquifer excursion monitor wells in the operating mining unit will be sampled every two weeks. The samples will be analyzed for the following excursion parameters:

Specific Conductivity
Total Bicarbonate plus Carbonate
Uranium (as U_3O_8)
Sulfate
Sodium
Chloride

Approximately two casing volumes of water will be pumped from each monitor well prior to collecting the samples. Unless an excursion is detected, the above water quality data will be forwarded to the DEQ in the annual report. Excursion reporting procedures are contained in Section 16.1.3. The water level in each monitor well will be measured prior to each sampling event and these data will also be submitted in the annual report.

The evaporation pond monitor wells will be sampled on a quarterly basis. The samples will be analyzed for the following parameters:

Specific conductivity
Total Bicarbonate plus Carbonate
Uranium (as U_3O_8)
Sulfate
Sodium
Chloride

The data obtained from the evaporation pond monitoring program will be forwarded to the DEQ in the annual report. If two or more parameters in any evaporation pond monitor well exceed their highest baseline value by 20% (highest baseline plus 1 mg/l for uranium) a second sample will be collected from the suspected well and analyzed.

If the results from the second sampling indicate two or more parameters still exceed their baseline values the DEQ will be notified in 24 hours and steps will be taken to identify and correct the problem. If leakage occurs, monitoring will be performed on a twice monthly basis until OPI demonstrates to the satisfaction of DEQ that the leakage problem has been corrected. Corrective actions pertaining to pond leakage are presented in Section 15.8.1 (Page 192). OPI will restore any aquifer affected by pond leakage by applying the same technology used for the restoration of the production zone (orebody) aquifer.

16.1.2 RESTORATION MONITORING

16.1.2.1 General Description

The monitoring of ground water quality for aquifer restoration purposes will be accomplished by utilizing restoration monitoring wells. The restoration monitoring wells will be pre-selected injection or recovery wells that will have been sampled prior to mining for the purpose of establishing baseline water quality. These same restoration monitoring wells will be sampled during the aquifer restoration phase to evaluate the restoration effort. There will be one restoration monitoring well for every one to three acres of wellfield. The locations of restoration monitoring wells are shown on Figures 15-7, 15-7A, 15-7B and 15-7C.

16.1.2.2 Baseline Ground Water Quality For Restoration Monitoring Wells

Baseline water quality in connection with the restoration monitoring wells will be established by collecting three rounds of samples from each well with a minimum of one week between sampling events. Each sample will be analyzed for the full Land Quality Division Guideline No. 4 List (Long List Table 16-1). A fourth round of samples will be collected and analyzed if variation is significant in the results

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