ATLAS CORPORATION X

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RICHARD E. BLUBAUGH Vice President of Environmental and Governmental Affairs RETURN ORIGINAL TO POR, HQ.

March 2, 1993

Mr. Ramon Hall
Director
Uranium Recovery Field Office
U.S. NUCLEAR REGULATORY COMMISSION
Box 25325
Denver, CO 80225

Re: License SUA-917 Docket No. 40-3453 Amendment Request DOCKETED
MARO 3 1993
MAIL SECTION
DOCKET CLERK

RECEIVED

Dear Mr. Hall

This is a request to amend the license as discussed with Mr. Gary Konwinski of your staff February 16, 1993. Atlas requests the following changes be made to License Condition No. 17.C.

Delete reference to the enhanced evaporation system.

The system was abandoned at the end of 1992 due to the following reasons:

- the pipes and spray orifices were plugging too often due to crystallization,
- maintenance manpower was excessive,
- the ponded solution was very small, and
- it was no longer effective.

Delete reference to concating seepage from the existing toe drains.

The toe drains have not produced any significant solution for several years, and nothing during the 1992 season. The phreatic surface of solutions in the impoundment has lowered to a level where the toe drains are no longer useful. The south sump will be closed in accordance with the March 1, 1993 letter from Canonie Environmental (enclosed).

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Mr. Ramon Hall March 2, 1993 Page Two

• Amend the language referring to dewatering wells to reflect that seven (7) wells are currently being pumped with a combined yield of approximately three (3) gallons per minute (gpm).

The other wells are no longer possible to pump due to failed pumps being stuck in the wells.

The following wells are still in use: PW1, PW4, PW6, PW7, PW8, PW9 and PW12.

 Delete the reference to neutralizing solutions if the pH falls below 6.0 standard units.

Since July 1990, when the system was made operational, no solution sample has yielded a pH of less than 6.8. Therefore, it is highly unlikely that neutralization would ever be necessary.

I trust this information is sufficient to allow amendment to Condition No. 17.C. of License SUA-917. Please contact me at your convenience if you have any questions.

Sincerely,

ATLAS CORPORATION

Richard E. Blubaugh

Vice President of Environmental

Hilad E. Blubange

and Governmental Affairs

REB:lds

Enclosure

cc: D.L. Edwards/C.H. Dixon

G.E. Davis

Canonie Environmental

March 1, 1993

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Mr. Richard E. Blubaugh
Vice President of Environmental
and Governmental Affairs
Atlas Corporation
Republic Plaza
370 Seventeenth Street, Suite 3150
Denver, CO 80202

Closure of Seepage Sumps Uranium Tailings Impoundment Moab, Utah

Dear Mr. Blubaugh:

Canonie Environmental Services Corp. (Canonie) has reviewed the requirements set forth for closure of the seepage sumps in our July 8, 1992 report of the Annual Inspection of the Uranium Tailings Impoundment at Atlas Corporation's (Atlas) Moab, Utah site (Source Material License No. SUA-917). This letter provides the results of the review and clarifies the objectives of the sump closure.

Two seepage sumps are located on the outside of the tailings impoundment embankments. These sumps formerly collected water from drains in the embankment and the seepage water was subsequently pumped back into the pond. As dewatering of the tailings impoundment has progressed and water levels in the tailings have declined, water has not collected in the sumps for several years. Consequently, both the northeast and southwest sumps are no longer being used.

Canonie previously indicated that decommissioning of the sumps should consist of excavating and removing the sump and backfilling the sump pit. Each pit would be over-excavated approximately five feet in depth and backfilled with a minimum of 7 to 10 cubic yards free-draining gravel. The purpose of creating such a gravel drain

March 1, 1993

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was to provide a vertical drain for minor amounts of seepage, if any, that could potentially enter the sump pits, allowing seepage to dissipate in the natural soils.

During demolition of the mill facilities at the Moab site, trenches were excavated and demolition debris will be buried in excavations. Atlas has indicated that during excavation of one area, the south sump was removed. This excavation will be backfilled with demolition debris without a specific zone of gravel in the area of the sump. As noted above, the purpose of the gravel drain was to provide a porous medium so that collected seepage, if any, would not fill the drain pipe due to the presence of low permeability soil adjacent to the end of the pipe creating a rising head condition within the tailings. Although the gravel drain was developed to provide the porous medium, the critical need for a highly porous medium has diminished since the phreatic surface in the tailings impoundment has declined steadily and liquids have not been present in the sumps for several years. Therefore, the porous condition resulting from the placement of demolition debris in the sump area should provide a suitable medium through which seepage would dissipate into the surrounding soil.

Please call me or Oliver Wesley at (303) 790-1747 if you have any questions.

Very truly yours,

David W. Kurz, P.E.

David W. Kung

Project Manager

DWK/alg