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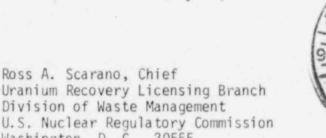
July 14, 1982

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Draft Staff Technical Re: Position Paper WMA-8203

Dear Mr. Scarano:

Ross A. Scarano, Chief

Washington, D. C. 20555

Uranium Recovery Licensing Branch

Division of Waste Management

The In Situ Leach Committee of the Wyoming Mining Association (WMA) wishes to thank you for sending to our organization a copy of the draft position paper entitled "Hydrogeological Characterization of Uranium Solution Mine and Mill Tailings Disposal Sites". The In Situ Leach Committee is currently reviewing the draft position paper; however, because of our own organizational structure and the need to get comments from a number of different companies, it will not be possible to have our responses in your hands by July 15, 1982. We will of course endeavor to provide you with our comments as soon as we are able to do so.

At this time, I would like to briefly express a concern that the In Situ Leach Committee has with the overall approach of this position paper and other formal and informal guidelines that the NRC uses in regulating in situ mining. The concern is the lumping together of in situ solution mining, and coventional mining/milling. We believe that the NRC and both mining groups would be better served if these two types of mining were kept completely separate in the regulatory process.

Thank you again for providing us an opportunity to comment on the draft position paper. We look forward to working with you and your staff on developing a sound and reasonable hydrogeologic position paper.

Sincarely,

Executive Vice President

WHB:pm

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