

JUL 23 1982

40-8786/KBW/82/06/28/0

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WMUR:KBW
 Docket No. 40-8786
 SUA-1400

Uranium Resources Inc.
 ATTN: Mr. Mark S. Pelizza
 Environmental Manager
 735 Promenade Bank Tower
 Richardson, Texas 75080

Dear Mr. Pelizza:

The Uranium Recovery Licensing Branch staff has serious problems with the inaccurate fluid balance data presented in URI's Quarterly Report dated May 21, 1982 for your North Platte R&D ISL Project. The data recorded in Attachment E of the report are as follows: February - 222,075 gallons injected and 236,361 gallons extracted; March - 829,503 gallons injected and 670,499 gallons extracted; April - 409,823 gallons injected and 376,118 gallons extracted. This data does not indicate an extraction rate adequate to maintain the hydraulic sink needed for prevention of lixiviant migration and is not consistent with your narrative analysis in Section 3.0 which estimates an unverifiable bleed rate of approximately 10%.

Section 3.0 of your Quarterly Report explained that: "Because of meter failure and inaccuracy, it became apparent that the injection and extraction and bleed rates could not be numerically recorded with the equipment at hand." It is the position of the NRC staff that failure of equipment in hand is not justification for not accurately measuring flow rates on each injection and production well over a 2-3 month period of time.

Source Material License No. SUA-1400 Condition No. 20 states that: "Flow rates on each injection and production well and injection pressures shall be checked at least once per day. This check noting any significant variations shall be recorded on a daily operational log." The staff has determined that it is not possible to carry out this required monitoring without properly functioning equipment.

The staff routinely confers with the Wyoming Department of Environmental Quality regarding uranium recovery operations in Wyoming. Mark A. Smith District I, Associate Engineer, is our current WDEQ contact for matters of mutual concern regarding your North Platte Project. We have received a copy of a June 3, 1982 letter he wrote to you regarding the same Quarterly Report we received. WDEQ's concerns about the bleed rate data are documented in that letter. In addition, in a June 22, 1982 phone call between Mr. Smith of WDEQ and K. Westbrook of my staff, Mr. Smith indicated his inspection of your facility did not enable him to conclude that the batch bleed system you are using has been adequate. WDEQ

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concur with NRC on the need for accurately measured injection and extraction flow rates.

In order to satisfy License Condition No. 20 and ensure environmentally safe operations, immediate action is needed to implement accurate flow measuring on each injection and production well.

In a related matter, License Condition No. 26 specifies that the licensee will provide the radiological environmental monitoring as outlined in Table 5.2.01 of the EIA in the first quarterly report. This data has not been included for the specified pre-operational and operational monitoring. It is our understanding, based on a July 7, 1982 phone call between K. Westbrook of my staff and Mr. Pelizza of URI, that this data will be submitted to us in late July, 1982.

In addition, your Quarterly Report contained the construction report required by License Condition No. 28, Section m. The only deficiency is that the required as built drawings showing details of the construction of all the various components of the pond were not included. In the same phone call referenced in the preceding paragraph, you committed to submit "as built" blueprints.

Please provide plans for rectifying the problems identified above by August 20, 1982. If you have any questions regarding these matters, please contact K. Westbrook of my staff (301) 427-4542.

Sincerely,

John J. Linehan, Section Leader
Operating Facilities Section I
Uranium Recovery Licensing Branch

cc: G. Brown, Region IV
W. Ackerman, WDEQ
M. Smith, WDEQ

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