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United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

ER-82/1158

AUG 16 1982

Mr. Ross A. Scarano, Chief
Uranium Recovery Licensing Branch
Division of Waste Management
Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Scarano:

We have reviewed the draft environmental statement for the operation of the Teton Project in Converse County, Wyoming, sent to us June 30, 1982.

The DES acknowledges several areas where the company's proposal is not fully accepted or where the pilot study is believed to be inadequate. In these cases, the DES is mute on the differences or inadequately resolves them. This leaves the reader unable to fully evaluate the potential impacts of the proposed project due to inadequate information regarding the areas of discrepancy between the staff and the company. Specific examples are presented below.

In appendix B-5, pages B-5 through B-6, Staff Independent Evaluation, several questions regarding the adequacy and appropriateness of the company's aquifer tests are raised. It is noted that: (1) the M No. 1 study was not conducted meticulously enough to yield more than rough approximations of aquifer transmissibility and storage and that the results should not be used to evaluate the degree of aquifer confinement; (2) tests indicate the N aquifer to be a leaky aquifer; and (3) the tests were poorly designed to accurately determine aquifer anisotrophy. As a result, required additional testing by the company as a part of the license is being proposed.

On the other hand, the conclusion in section 4.3.3. regarding the aquifer restoration proposal of the company indicates that it is believed that the company has adequately demonstrated that restoration of the ore zone aquifers to their original potential use condition is achievable. Since the restoration demonstration utilizes the aquifer test data found to be questionable, an apparent discrepancy exists between the two conclusions. We suggest that the statement be expanded to include a more detailed rationale for the conclusion that the restoration plan is achievable. We also suggest that the discussion of the inadequacies of the aquifer testing program address the rationale for requiring more testing, including the worst case scenario which would result from that faulty data and assumptions and an estimate of the probability of such an occurrence.

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The problem of releases of other heavy metals by the lixiviant process is mentioned but not addressed. On page 2-46, the DES specifically mentions the possibility of mobilizing such contaminants as arsenic, barium, fluoride, lead, selenium, vanadium, and zinc in the leaching process. However, the discussion suggests that such mobilization would be minimal, and the evaluation remains mute on the subject. In addition, the removal of potential contamination by heavy metals and other ions is not addressed in the discussion of the elution precipitation circuit on page 2-48, nor in the sections on groundwater restoration.

In view of other testing discrepancies discussed above, we believe that the FES should specifically address the issueof mobilized contaminants. Such a discussion should include an evaluation of the potential for contamination, the efficacy of groundwater restoration procedures for removing this type of contamination, the adequacy ofthe leaching and precipitation circuit for removing any contamination which occurs, and the disposal of contaminants removed from the system.

The discussions suggested above are necessary to provide the reader an independent means of evaluating the efficacy of the proposed processes and evaluating the potertial impacts.

We appreciate the opportunity to review your statement.

Sincerely,

Bruce Blanchard, Director
Environmental Project Review