

Umetco Minerals Corporation

40-8681



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RETURN ORIGINAL TO PDR, HQ.

November 5, 1990

Mr. Ramon E. Hall, Director
U. S. Nuclear Regulatory Commission
Region IV
Uranium Recovery Field Office
Box 25325
Denver, CO 80225

Re: Umetco Minerals Corporation
SUA-1358: Docket No. 40-8681
White Mesa Mill, Utah
License Condition 48

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USNRC
MAIL SECTION
DOCKET CLERK

Dear Mr. Hall:

This is in response to the letter dated October 17, 1990, in which the contents of a phone conversation between myself, Ms. Cynthia Corbett and Mr. Gary Konwinski were discussed.

The purpose of the call was to review the letter dated June 27, 1990, which is required by License Condition 48, and to discuss the status of Cell 2's Leak Detection System (LDS). In general, Umetco does not agree with all of the statements contained in the October 17 letter and subsequently contacted Ms. Corbett on October 19, 1990 by phone. After some discussion, she conferred with Mr. Konwinski and then called back, requesting that the samples referred to in the letter be taken. This sampling was declined by Umetco, based on the following reasoning.

Umetco agrees that sampling the fly ash pond, Cell 2's LDS, and Cell 2's liquor (even though a sample of the liquor from Cell 2 was not requested in the initial phone call) may provide worthwhile data. However, it is not Umetco's intention to abandon actions agreed to between Umetco and the NRC that, in Umetco's opinion, will make this evaluation moot. Umetco believes that the actions as outlined in the license will remove the source of liquid in the LDS. Umetco requests further discussions of this issue.

The samples requested may have provided data if taken before mill shutdown. The reason that a present sample of the fly ash pond is no longer appropriate is that the liquid in the fly ash pond is no longer representative of the liquids that have been present in the fly ash pond for the last five years. The present fly ash pond liquid is not chemically equivalent to the composition of the liquid present during the last five years, due to the fact that the liquid quenched hot fly ash during operations. The liquid present in the fly ash pond over the last five years is, in Umetco's opinion, the source of the liquid in the LDS. This opinion is

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Certified By Ryan C. Wood

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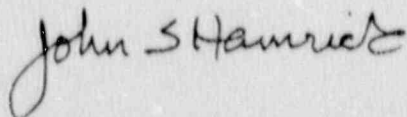
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supported by the observed direct relationship between fly ash pond level and LDS flow rate. A sample taken now, comparing the fly ash pond liquid with LDS liquid, will not support nor provide the basis for the kinds of conclusions pursued by your staff.

Umetco is willing to meet with you and your staff to discuss Cell 2's LDS. Umetco believes the best course is to proceed with the previously agreed upon actions and time frame as outlined in the license. If those actions do not resolve this situation, Umetco is willing to continue to evaluate the system with the NRC input. Please note that even if there is some contamination from Cell 2 present in the LDS, the flow rate is less than one gallon weekly, the areal extent appears localized, and the concentration of hazardous constituents is comparable to natural levels measured in monitor wells.

If I can answer any questions that you may have, please feel free to contact me.

Sincerely yours,

A handwritten signature in cursive script that reads "John S. Hamrick".

John S. Hamrick
Site Environmental Coordinator