

# URANIUM RESOURCES, INC.

40-8786

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RETURN ORIGINAL TO PDR, HQ

October 31, 1990

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



RE: License SUA-1400

Dear Mr. Hall:

Uranium Resources, Inc. (URI) has been actively decommissioning the North Platte facility over the past several months. Pending the results of the final verifying samples, and the final disposal of the drummed material at the American Nuclear facility early in November, we feel that the decommissioning is complete. Therefore, several conditions in the subject license appear outdated, and we request that they be changed as outlined below. I have formatted this correspondence by first restating the condition, followed by our requested change with the appropriate reason(s).

Condition 13

The volume of discharges to the two evaporation ponds shall be recorded. The results shall be included in the quarterly report as described in License Condition No. 14. The two evaporation ponds shall be monitored for leaks on a weekly basis. Any fluid detected in the standpipes of the pond leak detection systems shall be analyzed initially for chloride and conductivity. If these concentrations exceed Wyoming Drinking Water Standards, the fluids shall be analyzed for calcium, chloride, alkalinity, sodium, uranium, radium-226, selenium, arsenic, sulfate and TDS. If the chemical quality of the fluid found in the standpipe exceeds Wyoming Drinking Water Standards for any of the indicators tested, the licensee shall take immediate steps to repair the leak and the NRC, Uranium Recovery Field Office, shall be notified within forty-eight (48) hours. Water quality samples taken at the standpipe shall be sampled for at least the parameters listed above, at least once every seven (7) days during the leak period, and for at least two (2) weeks following repair, if any residual liquid remains in the standpipes. The results of all standpipe analysis shall be reported to the NRC, Uranium Recovery Field Office, in the semiannual report as described in License Condition No. 14.

Recommended Changes

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The pond liners and the leak detection system have been removed for disposal, and no additional fluid will ever be placed in these ponds. Therefore, we request that this condition be deleted.

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DESIGNATED ORIGINAL

12377 Merit Drive, Suite 750, LB 14 • Dallas, Texas 75261 • Telephone (214) 934-7777 • Telecopy (214) 934-7779 • TWX 910-867-4701

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Certified By *Mary C. Ford*

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Condition 17

The licensee shall immediately notify the NRC, Uranium Recovery Field office, by telephone of any failure of an evaporation pond which results in an uncontrolled release of radioactive materials, or of any unusual conditions which, if not corrected, could lead to such a failure. This notification shall be followed, within seven (7) days, by submittal of a written report detailing the conditions leading to the failure or potential failure, corrective actions taken, and results achieved. This requirement is in addition to the requirements of 10 CFR Part 20.

Condition 18

The licensee shall comply with the following operation of the evaporation ponds:

- A. The licensee shall maintain at least two (3) feet of freeboard between the embankment crest and the pond level.
- B. The licensee shall at all times maintain sufficient reserve capacity in the evaporation pond system to enable the transfer of the contents of a pond to other ponds in the event of a leak. In the event of a leak and subsequent transfer of liquid, the freeboard requirements specified in a shall be temporarily discontinued while the leak is being repaired.
- C. A fence that prevents the intrusion of game animals into the evaporation pond areas shall be maintained.

Recommended Changes

For the reason stated for deleting Condition 13 above, we request that conditions 17 and 18 be deleted.

Condition 25

The licensee is hereby exempted from the requirements of Section 20.203(e)(2) of 10 CFR 20 for posting areas within the facility, provided that all entrances to the restricted area are conspicuously posted with the words, "CAUTION - ANY AREA OR ROOM WITHIN THIS FACILITY MAY CONTAIN RADIOACTIVE MATERIAL."

Recommended Changes

Because the building has been decommissioned and will be turned over to the landowner, URI desires to remove the warning signs at this time. Therefore, we request that this condition be deleted.

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Condition 30

Notwithstanding the daily plant walkthrough required in License Condition No. 10, a weekly security inspection of plant facilities shall be performed and documented. In addition, an interior walkthrough inspection shall be conducted quarterly.

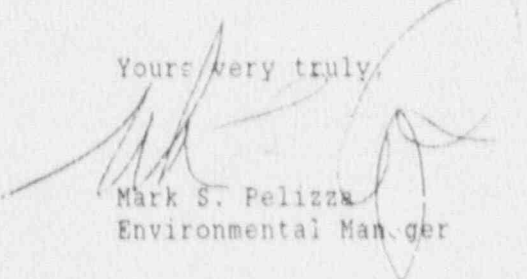
Recommended Changes

As mentioned within the opening paragraph of this correspondence, decommissioning at the property is complete and all the by-produce will be disposed of at American Nuclear Corp. (ANC) as soon as the NRC amendment to ANC's license is complete, which allows the transfer of the materials from the North Platte project. Therefore, as the need for any of the security inspections which are described within this condition are unnecessary, we recommend that this condition be deleted.

As soon as the analytical results of the verifying samples have confirmed that decommissioning standards have been achieved at the project, we will apply to have the subject license terminated. For the short-term, however, to assure that compliance of all conditions is maintained, we request that the subject license be amended and the recommended changes be approved.

Please feel free to contact me if you have any questions pertaining to this matter.

Yours very truly,



Mark S. Pelizza  
Environmental Manager

MSP/dlg