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Docket File No. 40-8771

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NOV 01 1982

URFO:YAY
Docket No. 40-8771
04008771050E

MEMORANDUM FOR: Docket File No. 40-8771
FROM: Yvonne Young, Project Manager
Uranium Recovery Field Office
SUBJECT: REVIEW OF MALAPAI RESOURCES COMPANY'S REVISIONS TO
THEIR WYDEQ PERMIT APPLICATION (MAY 25, 1982) AND
PERMIT ISSUED BY WYDEQ (MAY 3, 1982)

I have reviewed Malapai's revisions to their WyDEQ Mine Permit application, and the Mine Permit issued by WyDEQ.

With the exception of the cost breakdown for the proposed surety to cover all groundwater restoration, reclamation and decommissioning at the specified site, the material submitted to WyDEQ as well as the stipulations to the permit issued by WyDEQ contain no new information or data beyond that previously reviewed by the NRC. The staff further reviewed the cost breakdown for the proposed surety to determine if the data and information provided would satisfy the requirements of License Condition No. 58 which requires Malapai to submit a proposed surety supported by a detailed cost breakdown prior to injection of lixiviant. The purpose of this review was to notify Malapai if the data submitted to WyDEQ would not satisfy License Condition 58 prior to Malapai formally submitting the information to us.

Subsequently, the staff's review of Malapai's cost breakdown for their proposed surety in Malapai's WyDEQ mine permit application shows that additional supporting information is needed, when compared to the requirements of the NRC's License Condition No. 58.

The NRC will notify Malapai Resources Company by letter that the following additional items (including itemized quantities, unit costs and total costs) will have to be addressed in their submittal to the NRC.

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Item 1 - Groundwater Restoration

Basic Restoration Equipment Used (Reverse Osmosis, IX, Etc.,)

- Groundwater Monitoring and Analytical Costs
- Manpower, Technical Supervision

Item 2 - Evaporation Ponds

Removal of liners and leak detection system and cost associated with disposal of liners and evaporation pond residues and liquids, and transportation of the liquid and solid wastes to a disposal site.

Item 3 - Decontamination

Gamma and soil surveys to verify site decontamination. Decontamination surveys for buildings and equipment.

In addition, based on costs estimates from other R&D ISL's and groundwater restoration costs from "Report of Groundwater Quality After In Situ Uranium Leaching", prepared for the U.S. Bureau of Mines by Ford, Bacon, and Davis Utah, Inc, it appears that the \$20,000 for groundwater restoration is inadequate.

MRC will be requested to include the above information as well as that previously submitted to DEQ in their submittal required by License Condition No. 58. Upon receipt of MRC's submittal of their proposed surety supported by a detailed cost breakdown, prior to injection of lixiviant, the NRC will review the surety and determine if it satisfies the requirements of License Condition No. 58.

Original Signed By:

Yvonne Young, Project Manager
Uranium Recovery Field Office

Original Signed by:
J. J. Linehan

Approved by:

J. J. Linehan, Section Leader
Uranium Recovery Field Office

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