

URFO:CDMC
Docket No. 40-8681
04008681480R

DEC 04 1990

Umetco Minerals Corporation
ATTN: John S. Hamrick, Site
Environmental Coordinator
White Mesa Mill
P. O. Box 669
Blanding, Utah 84511

Dear Mr. Hamrick:

Your letter dated November 5, 1990, discussed actions you recommend to determine the source of fluid in the Cell 2 Leak Detection System (LDS 2). The NRC conclusion is that there is insufficient information to support Umetco's position that the source of the fluid is not from tailings pile leakage. Based on a review of available ground-water data, the NRC must make the conservative assumption that the source of the fluid is Cell 2.

Please submit sufficient additional ground-water data to support your interpretation of the source of the LDS 2 fluids. The suite of hazardous constituent concentrations in monitoring wells which are reported in the semiannual effluent report for the first half of 1990 are not reported for the LDS 2. This lack of information precludes a comparative review by the NRC staff, or verification of Umetco's statement that ground-water hazardous constituents are comparable at the points of sampling referenced.

The Code of Federal Regulations, 10 CFR Part 40, Appendix A in part states that the purpose of a leak detection system is to detect hazardous constituents and to generate data and information for appropriate administration of ground-water protection. In the Detection Monitoring Program proposed by Umetco and dated August 1, 1989, you state that low flow rates imply that cell leakage will best be detected at wells in close proximity to the cells. In view of this, the NRC staff has considered the LDSs at the White Mesa Mill to serve as point of compliance (POC) wells. Umetco's plan to discontinue use of previously established POC wells MW5, MW11, and MW12 (a consequence of Cell 4a and 4b construction) is further reason for this conclusion. The POC is the site specific location in the uppermost aquifer where the ground-water protection standard must be met.

PM:URFO *CMC*
CDMCorbett/db
11/29/90

PM:URFO *DCW*
DCWard
11/29/90

DD:URFO *[Signature]*
EFHawkins
11/29/90

D:URFO:RIV *[Signature]*
REHall
11/29/90

QFO2
1/0

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The NRC requests the ground-water data referenced above be submitted prior to any proposed meeting and not later than January 11, 1991. This will allow the staff to consider additional information so that a meeting may be subsequently scheduled to resolve this matter.

Sincerely,
Original Signed By:
R. E. HALL

Ramon E. Hall
Director

bcc:

Docket File No. 40-8681
PDR/DCS
URFO r/f
ABBeach, RIV
LLO Branch, LLWM
CDMCorbett
DCWard
LAnderson, RCPD, UT
8681/480R/CDMC/90/11/28/L