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Umetco Minerals Corporation

40-8681



WHITE MESA MILL * PO BOX 869 * BLANDING, LITAH 84511 ₱ (BO1) 678-2221

RETURN ORIGINAL TO POR, HQ.

December 19, 1990

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

DOCKETED



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

License Condition 48 and letter dated December 4, 1990

Dear Mr. Hall:

This is in response to the letter dated December 4, 1990. Umetco has apparently misunderstood what the NRC was requesting in License Condition (LC) 48 A and B. Umetco believes that the requirements of LC 48 A were met by taking the weekly samples, analyzing for the four specified hazardous constituents, and statistically analyzing for significant trends. Umetco believed that the requirements of LC 48 B were met by submitting the statistical analysis for NRC review, and by discussing the areal extent and concentration of the hazardous constituents measured as per LC 48 A. It is now Umetco's understanding that the NRC intended to request analysis of a larger list of hazardous constituents. Umetco has samples of Cell 2's Leak Detection System (LDS) in the process of being analyzed for the recommended list of hazardous constituents, as presented at the recent ACL workshop. Umetco will provide the NRC with an analysis of the results (along with the results themselves) by March 15, 1991. This date is driven by the time requirements for analysis, as well as report preparation.

Umetco is puzzled by the request for further information on the source of the liquids in the Cell 2 LDS. Umetco feels that with the issuance of the last version of LC 48, specifically LC 48 C, that the NRC's information requirements were reconciled with the need to define the source of the liquid.

The NRC has made statements concerning Points of Compliance in the referenced December letter, and Umetco disagrees with the statements. Umetco hereby proposes a meeting in your offices in Denver on January 22, 1991 to discuss groundwater monitoring at the White Mesa mill. If this date is not acceptable, please advise and we will work towards a mutually acceptable date.

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

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Sincerely yours,

Site Environmental Coordinator

91-0162 John S. Hamrick