

UNC MINING AND MILLING

40-8907



Division of United Nuclear Corporation
A **UNC RESOURCES** Company

New Mexico Operations
P.O. Drawer 00

Gallup, New Mexico 87301
Telephone 505/722-6651

UNC/ASHQ-91-412M
January 25, 1991

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

RETURN ORIGINAL TO PDR, HQ.

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VIA FAX

RE: Docket No. 40-8907

Dear Mr. Hall:

Thank you for sending the draft license amendment for the Church Rock site to me yesterday. You asked that we review it and offer our thoughts.

My initial reaction is that the draft raises significant issues that require detailed, technical review which we cannot complete by today. Also, rather than constituting an "approval" of United Nuclear's reclamation plan, the proposed license amendments impose exceptions on United Nuclear that in effect constitute non-approval of the Plan. They ask United Nuclear to submit new designs for the proposed radon barrier, riprap, and other parts of the reclamation plan, "for NRC approval." Depending on whether NRC approves, rejects, or modifies these designs, the reclamation plan may need to be further revised. On its face, then, the proposed amendment does not "approve" United Nuclear's Tailings Reclamation plan.

The many issues that the draft raises, and the changes to the design that it requires, will necessitate significant work by our technical consultants. I have instructed them to get to work on this immediately, and I hope that all of the issues you have raised can be resolved promptly.

However, given these facts, I think it would be premature to issue the draft as an "official" amendment to our license. We believe these technical issues can be resolved in a meeting with you and your staff early next week. However, we understand that you would rather have prepare a formal written response to the issues raised by the proposed amendment. We will be in contact with you on Monday to advise you as to when we can have a response available to submit.

Sincerely yours,

Juan R. Velasquez

JRV:jkt

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DESIGNATED ORIGINAL

Certified By Mary C. Hood

Handwritten initials and number: JRV, 91-0207

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