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October 21, 1993

Mr. Ramon E. Hall, Director  
Uranium Recovery Field Office  
Region IV  
Nuclear Regulatory Commission  
Box 26325  
Denver, Colorado 80225



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Dear Mr. Hall:

I appreciate the assistance and cooperation which you and your staff have extended to my office over the past several months regarding the clean-up of the radiation tailings at the Atlas-Moab site. We have reviewed and analyzed the documents comprising the "technical review and environmental assessment of the proposed reclamation plan for the Moab mill."

Through analysis of these documents, and collateral information received from the Utah Geological Survey and the University of Utah Seismograph Stations, it appears that several issues may not have been adequately addressed in the Reclamation Plan originally approved in 1981 and the Reclamation Plan Revision of 1992. There are three specific issues which I believe need further analysis and development prior to adoption of any reclamation plan for the tailings site:

- 1) Lateral underground infiltration of water, with the resultant leaching of radioactive material into the Colorado River.
- 2) The implication of slow movement, or "creeping" of the salt layer which underlays the entire Moab Valley, including the mill site.
- 3) Potential for seismic activity in the Moab Valley.

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LEACHING THROUGH UNDERGROUND WATER:

While the Reclamation Plan acknowledges the existence of lateral movement of underground water below the mill tailings site, there is little analysis of the possible effects of this phenomenon or the likelihood of leaching of radioactive material into the Colorado River. The Plan assumes that drilling wells and drying up the tailings will effectively prevent such leaching. In my opinion, this assumption must be supported with adequate scientific analysis.

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Certified by Mary C Ford

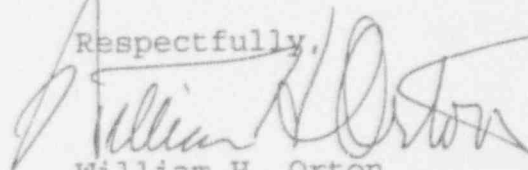
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GROUND DISTURBANCE THROUGH "SALT CREEP" OR EARTHQUAKE:

Of equal or greater concern is the issue of "salt creep" which has not been addressed in the Atlas plan. Authorities on tectonic and related activity have suggested that this is perhaps the most significant and ominous factor in evaluating the Atlas plan of on-site stabilization of the tailings. While traditional tectonic activity can cause immediate significant surface disturbance, depending on the severity of the earthquake, "salt creep" can cause just as much surface deformation over a period of 10, 20, 50 or 200 years, which is well within the time frame given in the Atlas plan guaranteeing the safety of the site. There is also an apparent possibility that underground deformation by "salt creep" could cause serious compromise of the site long before surface deformation might be apparent. In my opinion, the issue of ground disturbance through earthquake over a period of 200 to 1,000 years - the last significant earthquake, of 4.0 on the Richter scale, occurred in 1986 - or slow deformation over the same period through "salt creep" must be addressed through adequate scientific analysis.

Since the "Finding of No Significant Impact" (FONSI) and the Notice of Intent (NOI) to Amend Source Material License have been withdrawn, I strongly suggest that these issues be adequately addressed in your review and analyses of the Atlas-Moab site. Unless these issues, plus the other issues which resulted in withdrawal of the FONSI and NOI are resolved, it would appear that the alternative of moving the tailings must be reconsidered. I look forward to your analysis and response.

Respectfully,



William H. Orton  
Member of Congress

cc.: Diane Nielson, Utah DEQ  
Grand County Council Members:  
Peter Haney  
John Hartley  
Charlie Peterson  
Kenneth D. Ballantyne  
Paul J. Menard  
Bill Hedden  
John Maynard