

40-3453



Dead Horse Point



Moab West Rim



Delicate Arch



Fisher Towers

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259-7339

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Grand County

125 East Center
STATE OF UTAH
Moab, Utah 84532

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259-7425 Recorder
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259-5835 Treasurer
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259-7696 Assessor
Jim Nyland
259-8115 Sheriff
William L. Benge
259-7621 Attorney
Tim Keogh
259-8171 Surveyor

RETURN ORIGINAL TO PDR, HQ.

23 Oct 93

Ramon E. Hall
Director, Region IV
Uranium Recovery Field Office
PO Box 25325
Denver, CO 80225

Dear Ramon:

As per our conversations in Denver on the 6th of October and in Moab on the 7th October, I would like to submit the following as additional comments to you for consideration concerning Source Material License SUA-917, Docket No. 40-3453.

Technical Considerations:

Erosion:

1.) With regards to our site inspection on Thursday, October 8th on the extent of erosion along the banks of the Colorado River. Is there any noticeable erosion of the Colorado River bank on the mill site side that has occurred by comparing photographs from the 1950's with those taken today?

2.) What will become of the diversion dams that were placed in the Colorado River across from Courthouse Wash?

Seismic and Radon Barrier:

100055

3.) On October 14th there were two earthquakes which registered on the Richter scale at 2.9 and 3.4. The epicenter was just southwest of Dead Horse State Park, or approximately 20 miles away. Just after the earthquakes, it was apparent that the north and west slopes of the tailings pile had numerous sloughs and fractures of the red blow sand exposing the yellowed earth beneath. What effect would such seismic activity have on the stabilized tailings pile if

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left in place and would the integrity of the radon barrier be compromised in the future with the cumulative impacts of such seismic activity?

Groundwater:

- 4.) At our site inspection on the 7th October, Gary showed that the groundwater leaves the tailings pile at the southeast corner of the pile. On an aerial map, the historic Moab wash appears to be identical to the area described by Gary. Since the site visit, Grand County has received steady rains and the Moab wash has been wet during this entire time. The groundwater appears to continue on its historic stream bed and pass under the pile only to emerge at the site described by Gary, while the surface water only is diverted around the pile. The area described by Gary as to where the groundwater exits the tailings pile and goes into the river is now characterized by dead plant life, primarily tamarisks. Also the extent of the impacted tamarisks appears to have a clearly demarcated radius from the tailings pile, extending outward to where that radius intersects with the river. What is the correlation with the groundwater exiting the tailings pile and the dead plant life now existing there? Does this phenomena show up on photos of the site from the 1960's, 70's and 80's?
- 5.) The Final Environmental Statement (FES) related to the operation of the Moab Uranium Mill, January 1979, section 6.5 BIOTA, 6.5.1 Terrestrial states, "Because it is possible that prairie falcons could feed on or near the Atlas site, the staff has required the applicant to determine the soft tissue body burden of arsenic in rodents near the Atlas site, as an indicator of the risk of adverse impacts to the prairie falcon. The proposed expanded radiological and environmental monitoring program will make continued monitoring of additional terrestrial biota unnecessary." Please include the results of those determinations of the soft tissue body burden of arsenic in rodents found near the Atlas site and the site where those rodents were trapped in your comments.
- 6.) In section 6.5.2 Aquatic Biota of the FES mentioned above states, "It is the staff's opinion that routine monitoring of aquatic biota in the Colorado River is not necessary because the probability of adverse impact to indigenous aquatic communities is extremely low." As there is clear adverse impact to the plant community adjacent to the tailings pile, particularly the tamarisks, and this impacted community intersects with the Colorado river, hasn't the probability of adverse impact to the aquatic community increased from "extremely low"? Shouldn't this mixing zone of potential adverse impacts on the aquatic biota be monitored?
- 7.) If there is an impact of the groundwater on the vegetation adjacent to the tailings pile, does the NRC still maintain that the entire tailings impoundment could enter the Colorado river under the hypothetical worst case scenario without any measurable impact?

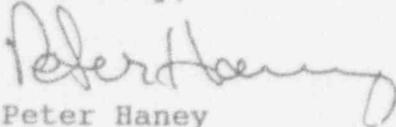
Cost Analysis:

For better determination of truck traffic volume the Gross Vehicular Weight of traffic permitted on the Loop road, the road adjacent to the borrow site for the riprap, is 20,000 lbs. Also any damage to the road or bridges caused by truck traffic must be repaired by the responsible agency. Depending on the route, the Loop road section utilized may be in our neighboring county.

As per our discussion in Denver on the 6th October about 2% of gross sales of the mill going to reclamation as mentioned in the NRC's Generic Environmental Impact Statement, please compile the costs of closure of all the Title I and Title II sites as a percentage of gross sales of each mill site.

I thank you for this opportunity for additional comments.

Sincerely,



Peter Haney
Grand County Council
Atlas Reclamation Committee

cc: Bill Sinclair, RCPD, Utah
Sen. Orrin Hatch
Sen. Robert Bennett
Congressman Bill Orton
Congresswoman Karen Shephard
Bob DeSpain, EPA-Denver