



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

RETURN ORIGINAL TO PDR, HQ.

40-8907

NOV 3 - 1993

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

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Re: License Modification for United Nuclear Corporation (UNC)

Dear Mr Hall:

The United States Environmental Protection Agency (EPA) has received the draft amendment to the Source Material License SUA-1475. After reviewing the NRC draft EPA concurs with the proposed changes. For the sake of clarity the following comments are provided noting the rationale for concurring with the changes in the license conditions:

License Condition	Elements of the condition	Approval Yes/No/Agree
15	Dam modified during reclamation - required inspections not meaningful	Yes
24	Relates to discharge of process effluents- not relevant as process no longer discharges	Yes
28	Language inadvertently omitted during August 14, 1992 license amendment to be reinstated	Yes
30 *	Delete cyanide and naphthalene from the list of hazardous constituents based on absence of these constituents since 1989	Yes
30 *	Denial for discontinuing Zone 1 corrective action	Agree
30 *	Approve stoppage of pumping in 12 wells but abandonment only for well 610, in Zone 3. Use 8 of the 12 wells for monitoring.	Agree
30 *	No change to corrective action in the Southwest Alluvium until background water quality standards are settled.	Agree

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Certified By Mary C. Ford


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It should be mentioned that elements of License Condition 30 * have already been approved in response to UNC's request, in February 1993.

We appreciate your indication to UNC that the issues related to appropriate background water quality are deferred to EPA's current statistical evaluation of monitoring data. Also, that if a mutually satisfactory resolution of cleanup standards is not settled in a short time frame, it can be addressed under the Alternate Concentration Limit (ACL) procedure at a later date.

If you have any questions, please contact me at (214) 655 6782.

Sincerely,



Shawn Ghose, RPM
OK/NM Superfund Enforcement
Section (SH-EO)

cc: Sam Becker, Chief
Superfund Enforcement Branch