



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
URANIUM RECOVERY FIELD OFFICE  
BOX 26326  
DENVER, COLORADO 80226

MAR 08 1991

URFO:DCW  
Docket No. 40-8681

MEMORANDUM FOR: Docket File No. 40-8681  
FROM: Dana C. Ward, Project Manager  
SUBJECT: MEETING TO DISCUSS UMETCO WHITE MESA'S CELL 2, LEAK  
DETECTION SYSTEM  
DATES: February 15, 1991, Meeting  
February 25, 1991, Memorandum

Participants: NRC  
Ramon E. Hall, Director  
Edward F. Hawkins, Deputy Director  
Gary R. Konwinski, Project Manager  
Cynthia D. Miller-Corbett, Project Manager  
Dana C. Ward, Project Manager

UMETCO  
Richard VanHorn, Manager of Operations  
Roger Jones, Corporate Environmental Coordinator  
John Hamrick, Site Environmental Coordinator  
Wallace Brice, Maintenance Superintendent  
Gerald Ray, Production Superintendent  
Harold Roberts, Energy Fuels

Summary of Discussions: Representatives of Umetco met with the Director, Uranium Recovery Field Office and select staff to discuss Umetco, White Mesa's Cell 2 leak detection system (LDS) which is collecting fluids at the rate of approximately two gallons a week. It was concluded after lengthy discussions that Umetco would submit an amendment request to revise License Condition No. 48. This new amendment would also contain wording to initiate a corrective action program for seepage detected at any LDS.

Background

July 27, 1990, Umetco submitted as required by License Condition No. 48 a statistical analysis of the ground water for the White Mesa facility.

PM: URFO *DCW*  
DCWard/db  
03/07/91

PM: URFO *Cmc*  
CDMCorbett  
03/7/91

PM: URFO *GRK*  
GRKonwinski  
03/7/91

DD: URFO *EH*  
EHawkins  
03/7/91

D: URFO: RIV *REH*  
REHall  
03/7/91

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October 17, 1990, NRC concluded by letter that the statistical analysis conducted by Umetco was inconclusive and that Umetco should collect and characterize fluids from the facilities' fly ash pond, pond 2 liquids and cell 2 LDS.

November 5, 1990, Umetco stated by letter that they disagreed with NRC's position and declined to conduct sampling of the fly ash liquids contending that the sample would no longer represent the fly ash environment. Umetco also requested a meeting with the NRC to discuss its' position.

December 4, 1990, NRC informed Umetco by letter that the LDS's at White Mesa are considered the points of compliance.

December 19, 1990, Umetco by letter disagrees with the NRC designation of LDS's as a points of compliance. Umetco further contends that License Condition No. 48(C) will handle the current situation and that Umetco and/or NRC must misunderstand what is contained in License Condition No. 48(A) and (B).

January 9, 1991, NRC requests by letter from Umetco characterization of fluids in LDS No. 2, nearby wells and the fly ash pond. NRC also requests that Umetco determine the aerial extent of contamination.

#### Discussion

At the meeting held February 15, 1991, the LDS No. 2 at White Mesa was specifically considered. The licensee presented its case on why they believe that the cell 2 LDS fluids are originating from the fly ash pond and not from the cell 2 containment structure. Umetco contends that the liquids from the fly ash pond are proceeding laterally under cell 2 via fractured bedrock under the southern end of the fly ash pond. Umetco states that they noted fluctuations in the water volumes from cell 2's LDS while recent excavations and removal of material were conducted in the fly ash pond. Umetco states that it is appropriate to follow License Condition No. 48(C) prior to pursuing any other alternative action. The licensee was concerned about the possibility of designating any or all of the LDS as point of compliance wells. The licensee did commit to assigning the LDS as an "unofficial" compliance point as a condition of the license. The licensee also stated that License Condition No. 48 could be rewritten to establish an effective compliance monitoring program.

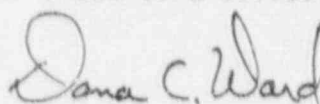
The NRC contends that unequivocal proof has not been produced that would allow the staff to conclude that liquids contained in the cell 2 LDS are from the fly ash pond or from another source such as tailings seepage. The NRC stipulated that it must have additional characterization of fluids from all sources to determine the origin of the cell 2 LDS fluids. The staff agreed with the licensee that License Condition No. 48 could be revised to allow the LDS to function as an "unofficial" compliance point. This would be done by incorporating a license condition requiring a corrective action plan specific to the LDS's. The NRC agreed that License Condition No. 48 could be revised and improved removing potentially ambiguous language and revising the sampling requirements.

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Conclusion

It was agreed that Umetco would submit an amendment request to License SUA-1358 to revise License Condition No. 48. The revised license condition would be more comprehensive in implementing Umetco's ground-water detection monitoring program. Revised License Condition No. 48 would also contain language explicit to Umetco's corrective actions regarding LDS's and point of compliance wells. Umetco will submit the request for a license amendment in the near future.

It was also decided that Umetco will continue to complete activities as directed under License Condition No. 48(C) for the fly ash pond while continuing to pump liquids from cell 2's LDS as a corrective action program.



Dana C. Ward  
Project Manager

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8681/DCW/91/02/26/M