

40-6659

# Petrotomics Company

P.O. Box 8509, Shirley Basin, Wyoming 82615 · Telephone: (307) 234-9341

September 21, 1994

U.S. Nuclear Regulatory Commission  
Division of Waste Management M.S. 5 E2  
Attn: Joseph J. Holonich, Chief  
High Level Waste and Uranium  
Recovery Projects Branch  
11555 Rockville Pike  
Rockville, MD 20850

Reference: Reclamation Plan - Source Material License SUA-551.

Dear Mr. Holonich:

We have received your letter dated September 13, 1994, transmitting comments concerning review of Petrotomics previously approved reclamation plan, and our comparison of the design with the 1990 Staff Technical Position (STP) which was submitted on October 30, 1991. Based on our initial review of the comments, 60 days is not sufficient time to address the issues raised, and 10 days is not sufficient to allow adequate determination of a submission date, particularly if substantial additional design effort may be necessary. We respectfully request that additional time for review and evaluation of the comments, and review of the reclamation plan in light of the comments, be allowed so that we can more adequately address the time required for re-evaluation of the plan and determination of the scope of additional information which may be necessary. We propose that the time allowed to provide a date for submission of additional information be extended to November 30, 1994.

We are surprised and dismayed by the extent and number of the design features and parameters which your staff feels may be inappropriate, inadequate, or insufficiently justified. Nuclear Regulatory Commission approval of the reclamation plan was issued late in 1989, after the draft STP was issued and very shortly before issuance of the Final STP, after three years of substantial design effort, revision, and coordination with the reviewing staff. We find it difficult to understand the reasons for the substantial differences now apparent. It appears that extremely conservative parameters are now desired for reclamation plan design.

We will do everything reasonably possible to help reconcile the apparent differences including meeting with your staff to

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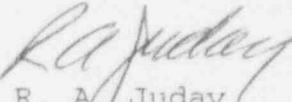
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Mr. Joseph J. Holonich  
September 21, 1994  
Page 2

discuss and clarify the issues. In any event, we do need the further time to evaluate the scope of additional study and estimate the time required to develop the appropriate additional information.

Sincerely,

  
R. A. Juday  
Supervisor

pc: Mr. Mohammad Haque

U.S. Nuclear Regulatory Commission  
Region IV  
Attn: Samuel J. Collins, Director  
Division of Radiation Safety and Safeguards  
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