

URANIUM RESOURCES INC.

MARK S. PELIZZA
Environmental Manager

September 2, 1982



Mr. Ross A. Scarano, Chief
Uranium Recovery Licensing Branch
Division of Waste Management
U.S. Nuclear Regulatory Commission
7915 Eastern Avenue
Silver Spring, Maryland 20910

Re: Materials License SUA-1400
Amendment No. 5

Dear Mr. Scarano:

We are in receipt of Amendment No. 5 of the subject license dated August 26, 1982.

URI objects to this Amendment in that several items do not correspond to our revised Restoration Procedure which was submitted May 10, 1982.

In our Restoration Procedure, URI requested that excursion control parameters be limited to conductivity, chloride, sodium or uranium. Technical justification for this change disclosed that calcium and alkalinity are not suitable parameters. In fact calcium and alkalinity were on excursion before production began. The net effect of ignoring URI's request is that wells NPMW-1, NPMW-2, NPMW-3, NPMW-4 must remain on excursion status and be sampled weekly even though leachate is not present in these wells. The relaxation given for frequency of sampling in Amendment No. 5 is therefore nullified by not removing calcium and alkalinity as indicators.

Within the subject license amendment are the requirements that the USNRC, Uranium Recovery Licensing Branch approve, in writing, restoration prior to starting the six month stability period. Also, the amendment requires that monthly stability sampling of well P-1 continue until final approval in writing be given by the NRC. URI objects to this procedure because it would add six months or more to plant operation time. This would prove very costly with no benefit. We feel it would be prudent to begin the six month stability sampling immediately after the verification sample is obtained. Also, we feel that

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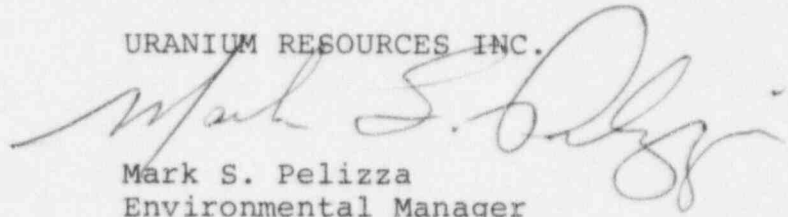
we should be permitted to discontinue the stability sampling in six months, when stability is apparant. This would eliminate sampling without any cause other than waiting for a NRC letter to be processed.

By this letter, URI officially requests license condition #17 be amended to reflect the changes described above. Suggested wording for condition #17 is attached.

If you have further questions pertaining to our request, please contact the undersigned.

Sincerely,

URANIUM RESOURCES INC.



Mark S. Pelizza
Environmental Manager

MSP/jmw
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ATTACHMENT

Suggested Wording for Condition #17

20702

17. Restoration shall be accomplished through reverse osmosis or any method that doesn't involve the addition of chemicals to the injection stream except for H_2S_2 or SO_2 as indicated in the licensee's original application report of March, 1981. The licensee shall notify the USNRC, Uranium Recovery Licensing Branch within thirty (30) days of any subsequent changes in the restoration methods specified in the licensee's May 10, 1982 submittal.

Restoration of the production aquifer and any other groundwaters that may be affected by mining operations shall be initiated within sixty(60) days after solution mining operations have been terminated.

The objective of restoration shall be to return the groundwater quality, on a groundwater indicator by indicator basis, to baseline conditions for each well.

Water level readings shall be taken, recorded, and submitted during all groundwater quality analysis specified in the subsequent paragraphs.

During restoration, a sample shall be taken weekly from well P-1 and analyzed for conductivity, chloride and uranium until restoration is verified.

The 10 wells (6 perimeter ore zone monitor wells and 3 shallow and 1 deep monitor well) shown on Figure C-5-2 of the licensee's March 31, 1981 Technical Report shall be used for groundwater quality monitoring during restoration. These wells shall be sampled monthly for conductivity, chloride and sodium until restoration is verified.

When URI's sampling results for well P-1 show that restoration is achieved, a verification sample (including 5 injection-production wells and also any monitor well(s) ever having been declared on excursion during operation or restoration) shall be analyzed for the full suite of water quality indicators listed in Table 5.1.01 of the EIA.

In addition, all 10 monitor wells shall be analyzed for the following: conductivity, chloride, sodium, calcium, alkalinity, gross alpha, gross beta, nitrate, nitrite, lead-210, flouride, and radium-226. The results of the verification samples shall be sent to NRC for evaluation within thirty(30) days. Restoration shall be considered complete only upon written notification by the USNRC, Uranium Recovery Licensing Branch.

Post restoration monitoring shall continue for six (6) months after obtaining the verification sample. Well P-1 shall be analyzed monthly for the full suite of water quality indicators listed in Table 5.1.01 of the EIA. When sampling results from P-1 indicate stability is achieved, a verification sample (including 5 injection and production wells and 10 monitor wells) shall be analyzed for the full suite of water quality indicators listed in Table 5.1.01 of the EIA. The results of the final post restoration verification samples shall be sent to NRC for evaluation within thirty (30) days.