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Ray Pene
Telephone: 801-259-1346



COUNTY ADMINISTRATOR

Earl W. Stres
Telephone: 801-259-1346
Fax: 801-259-2574

40-3453

27 Aug 96

Joseph J. Holonich, Chief
High-Level Waste and Uranium Recovery Projects Branch
Division of Waste Management
Office of Nuclear Material Safety and Safeguards
Mail Stop TWFN 7J-9
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Draft TER open question concerning subsidence

Dear Mr. Holonich:

At Atlas Minerals' informational meeting in Moab, they presented information stating that the subsidence rate for the Atlas site was 0.2 - 1.0 mm/yr. In 1955, after Northwest Pipeline had laid their natural gas pipeline across the Colorado River they did a Level 1 survey (see attached). Grand County followed up on the 1955 survey this summer with another Level 1 survey (see attached). The resulting relative difference is that the southside benchmark is 2.16 inches lower relative to the north benchmark as shown on the enclosed map. This rate of subsidence translates to 54.86 mm over 41 years or 1.33 mm/yr. This empirical number is significantly higher than Atlas's proposed estimate of 0.2 - 1.0 mm/yr and 1.33 mm/yr should be the lowest rate used in the NRC's calculations to determine when and how often the pile will fail due to subsidence during the future regulatory life of the pile. At this rate the Southeast slope of the tailings pile will subside more than 52 inches over the next 1000 years. What measure of engineering will counteract this process to maintain the tailing pile's integrity for at least 1000 years?

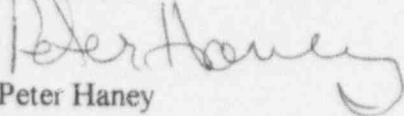
As the original referencing point of the old highway 160 river bridge is no longer available we are checking with UDOT and others to see if we can correct for the difference of the relative referencing points. Nonetheless, the south side benchmark, which is clearly within the subsidence zone, is still 2.16" lower than the north bench mark, which is clearly outside the subsidence zone. As always, I will keep you informed of our progress in these matters.

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PDR ADOCK 04003453
C PDR

125 East Center Street • Moab, Utah 84532 • Fax 801-259-2959

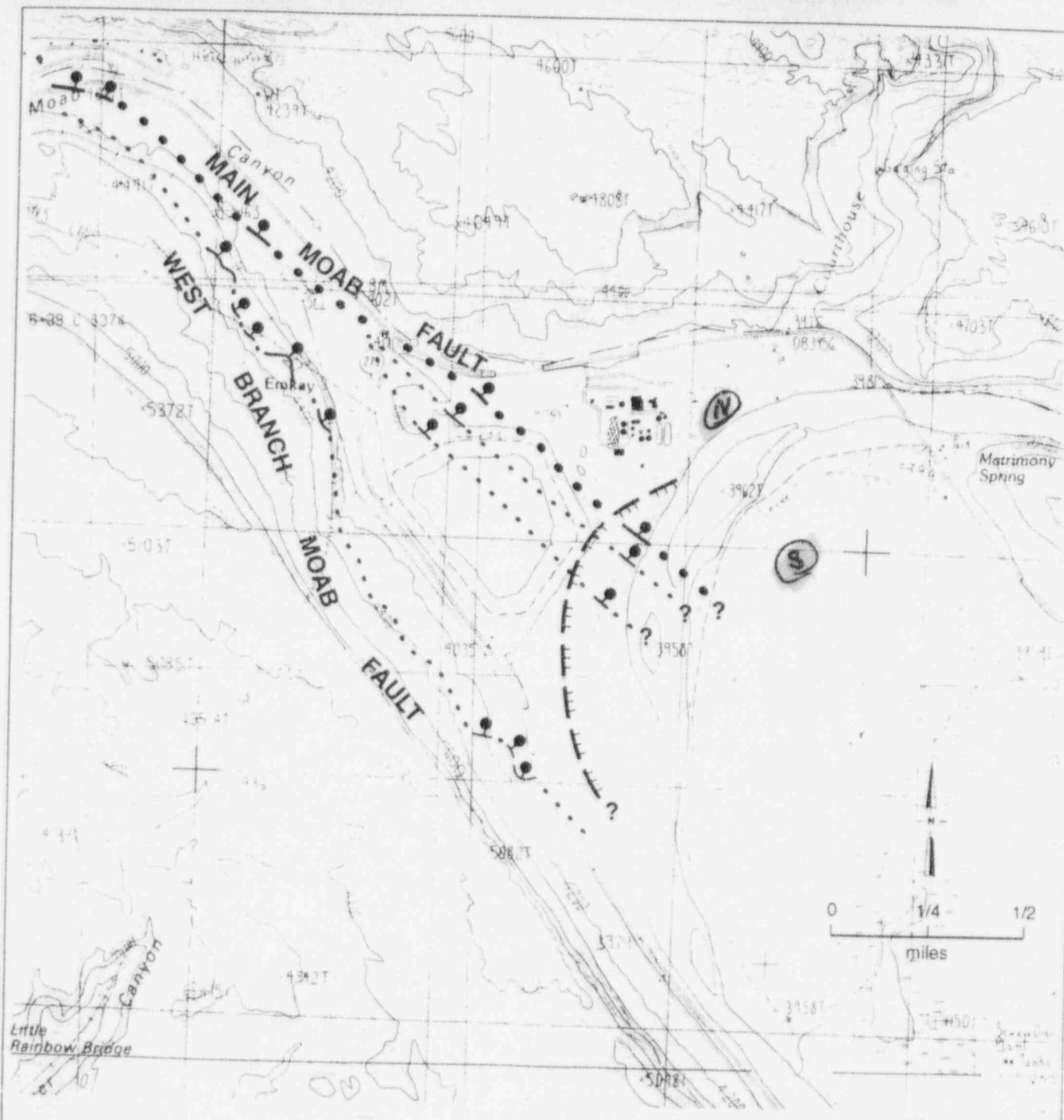
Also, within the document titled: "Evaluation of Potential Seismic and Salt Dissolution Hazards at the Atlas Uranium Mill Tailings Site, Moab, Utah" by Woodward-Clyde there is Section 3.0: Potential for Salt-Dissolution Collapse. The contents of Section 3.0 were to be submitted later. Have the contents been submitted and if so could we please receive a copy of them?

Sincerely,


Peter Haney

cc: w/enclosures

Senator Hatch
Senator Bennett
Congressman Orton
Congresswoman Greene
Governor Leavitt
Phil Justice
Ted Johnson
Woodward-Clyde



LEGEND

- Main fault, bar and ball on down thrown side, dotted where buried
- Subsidiary fault
- Buried escarpment

Sources:

West Branch Moab Fault- Doelling et al. (1995)

Main Moab Fault and smaller subsidiary faults-
Cooksley Geophysics (1995)

Project No.
SK9407

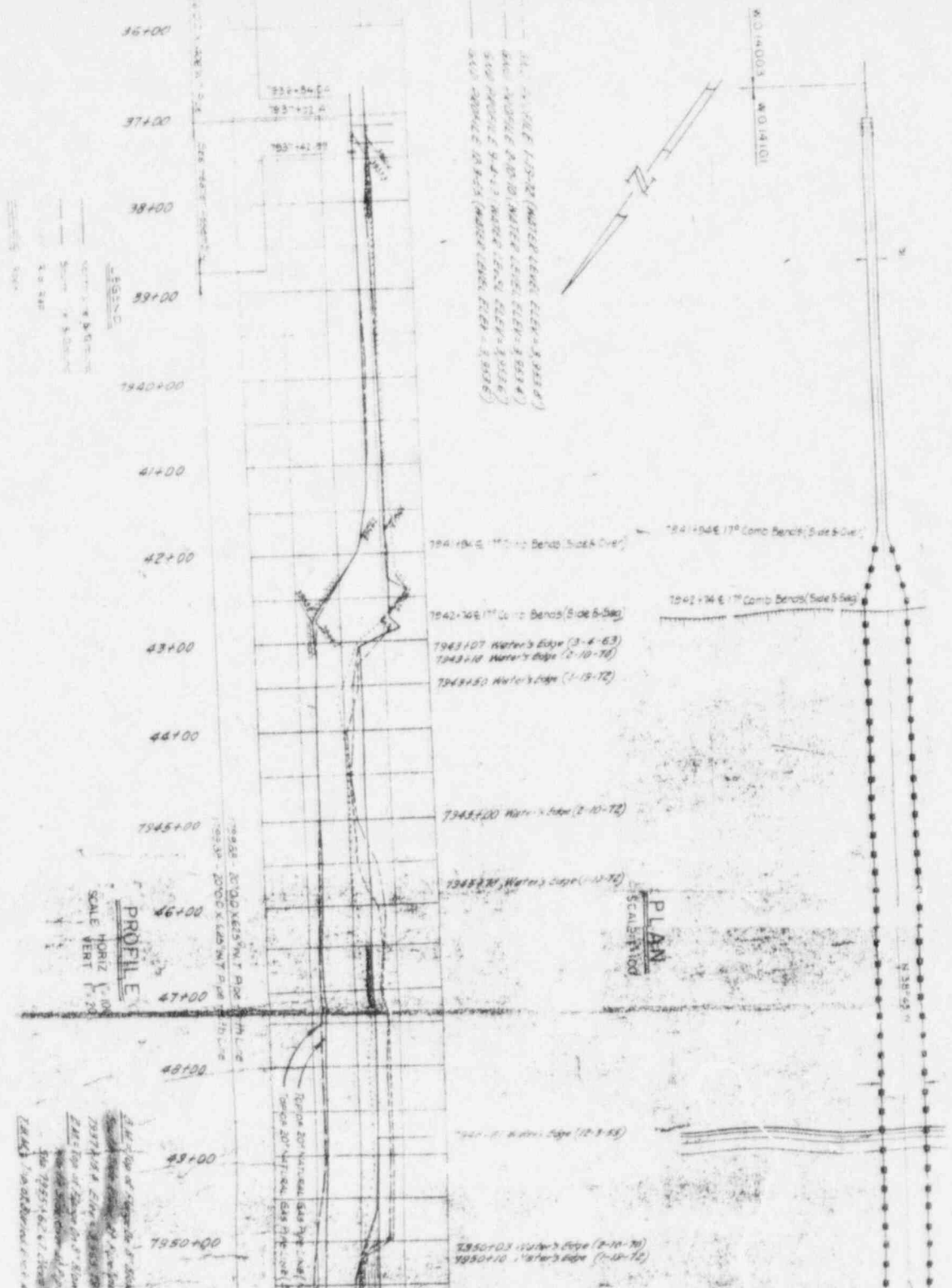
Atlas Uranium Mill
Tailings Mill

Woodward-Clyde Federal Services

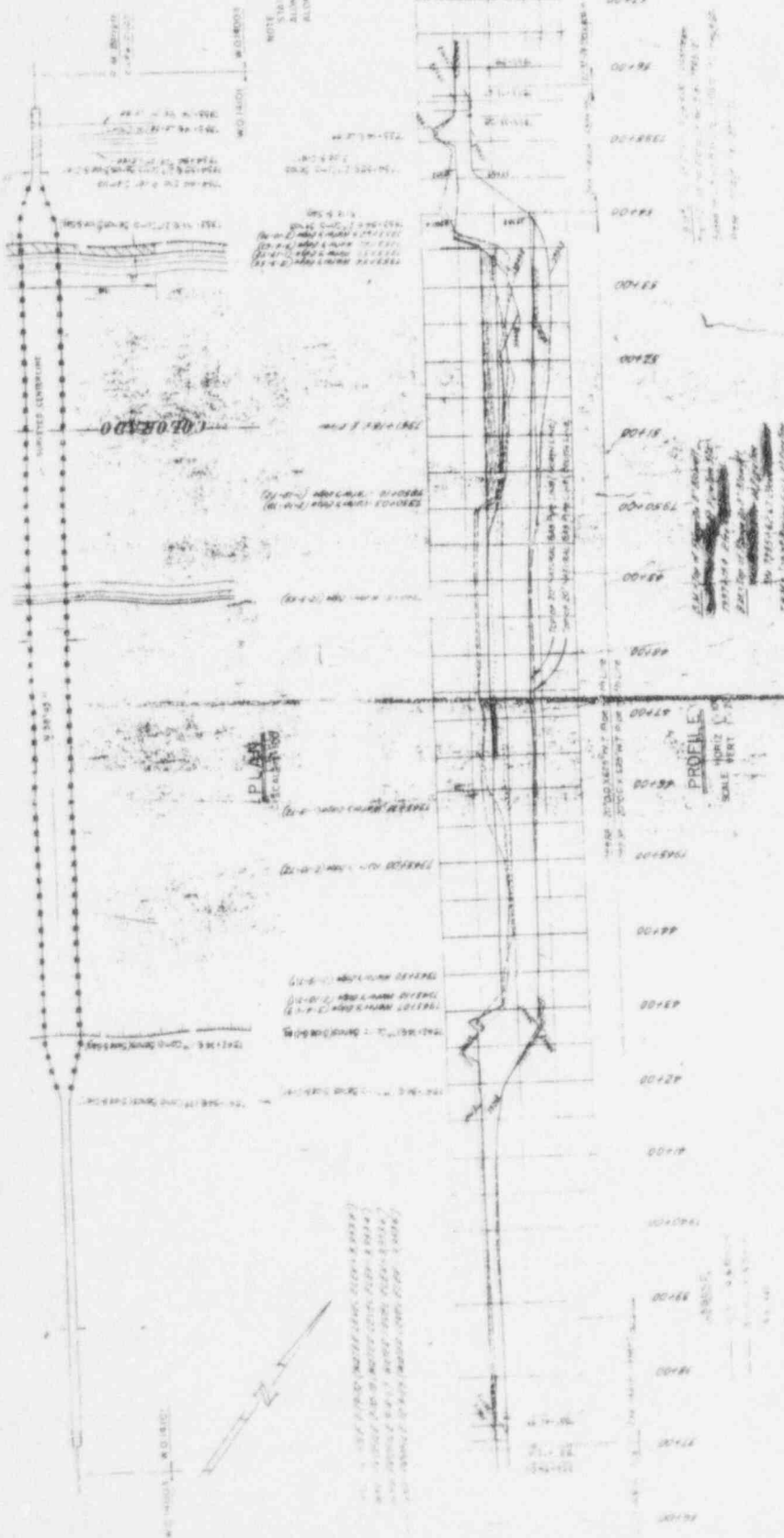
COMBINED STRUCTURAL
MODEL FOR THE SITE

Figure
2-18

SK9407-A310/120595/vone



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KEOGH LAND SURVEYING
REGISTERED LAND SURVEYORS
45 E. Center • P.O. Box 396
MOAB, UT 84532

(801) 259-8171

Telephone and Fax

July 17, 1996

Mr. Peter Haney
1991 S. Cedar Hills Rd.
Moab, UT 84532

Dear Peter,

As directed, we have determined the Elevation of the NW Pipeline Valve flanges on both ends of the Colorado River Crossing at Moab. The results are following:

VALVE FLANGE AT SOUTH SIDE = 3966.06

VALVE FLANGE AT NORTH SIDE = 3964.44

The elevations are based on a control network tied to U.S.C. & G. benchmarks in the area, and are the result of a self checking loop.

Sincerely,

Timothy M. Keogh
Timothy M. Keogh

