



# energy fuels nuclear, inc.

three park central • suite 900  
1515 arapahoe street • denver, colorado 80202

303-623-8317  
twx 910-931-2561  
fax 303-595-0930

March 17, 1997

Mr. Joseph J. Holonich, Branch Chief  
High Level Waste and Uranium Recovery  
Projects Branch  
Division of Waste Management  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
2 White Flint North, Mail Stop T-7J9  
11545 Rockville Pike  
Rockville, MD 20852

Re: Addendum to Amendment Request to Process on Alternate Feed at White Mesa Uranium  
Mill dated March 5, 1997  
Source Material License SUA-1358  
Docket No. 40-8681

Dear Mr. Holonich:

Energy Fuels Nuclear, Inc. ("EFN") hereby requests that the referenced Amendment Request be modified by replacing the copyrighted copy of alternate feed guidance included (as Attachment 1 of Enclosure 1) in Attachment 3 with the enclosed photocopy of the same guidance, which EFN received in a package of Materials from the NRC. In addition, EFN requests that the information identified as "confidential" contained in the Amendment Request be maintained by the NRC as confidential until March 15, 2000. EFN also reserves the right to reevaluate this proposed release date as circumstances may change over the course of the proposed three year period. [Note: address actions completed or date reached which allow NRC to release the entire amendment request to the Public Document Room].

I can be reached at (303) 899-5647.

9704110172 970317  
PDR ADOCK 04008681  
C PDR

Sincerely,

*Michelle R. Rehmanna*  
Michelle R. Rehmanna  
Environmental Manager  
*by Debra Medina*

MRR/pl  
Attachment

*change*  
*NRE PDR*    *1*    *Ltr ENCL*    *1*    *w/o*    *PROP*



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March 5, 1997

Mr. Joseph J. Holonich, Branch Chief  
High Level Waste and Uranium Recovery  
Projects Branch  
Division of Waste Management  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
2 White Flint North, Mail Stop T-7J9  
11545 Rockville Pike  
Rockville, MD 20852

Re: Revised Amendment Request to Process an Alternate Feed at White Mesa Uranium Mill  
Source Material License SUA-1358  
Docket No. 40-6581

Dear Mr. Holonich:

Energy Fuels Nuclear, Inc. ("EFN") hereby submits the enclosed revised request to amend Source Material License SUA-1358 to authorize receipt and processing of [ ] known as the [ ] ("uranium material"). The uranium material will be shipped to the EFN White Mesa Mill ("the Mill") by [ ], the "material owner".

The uranium material has been stored at the owner's facility, the [ ] since November, 1987. The uranium material is currently stored in approximately [ ] fifty-five gallon drums. The weight of the uranium material is approximately [ ] pounds. The material owner estimates an average uranium content of [ ].

The processing of the uranium material will not increase the mill's production to exceed the License Condition No. 12 limit of 4,380 tons of  $U_3O_8$  per calendar year. As production will remain within the limits assessed in the original Environmental Assessment, and as the process will be essentially unchanged, this amendment will result in no significant environmental impact beyond those originally evaluated.

Mr. Joseph J. Holonich  
March 5, 1997  
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Complete details are provided in the attached request to amend, which includes the following sections:

- 1.0 Material Composition and Volume
  - 1.1 Radiochemical Data
  - 1.2 Review of Hazardous Constituent Data
  - 1.3 Regulatory Considerations
  - 1.4 Shipping

2.0 Process

- 3.0 Safety Measures
  - 3.1 Control of Airborne Contamination
  - 3.2 Radiation Safety
  - 3.3 Vehicle Scan

4.0 Certification

Attachment 1 [ ]

Attachment 2 [ ]

Attachment 3 [ ]

Attachment 3a [ ]

Attachment 4 Energy Fuels Nuclear, Inc. White Mesa Mill Equipment Release/Radiological Survey Procedure

To ensure that all pertinent information is included in this submittal, the following guidelines were used in preparing this request to amend:

- U.S. Nuclear Regulatory Commission ("NRC") Final Position and Guidance on the Use of Uranium Mill Feed Material Other Than Natural Ores (Federal Register Volume 60, No. 184, September 22, 1995).
- EFN request to the NRC for the amendment to process uranium-bearing potassium diurate ( $K_2U_2O_7$ ) in a solution of potassium hydroxide/potassium fluoride in water ("KOH Amendment").
- NRC and State of Utah comments and requests for information relative to the KOH Amendment.

Mr. Joseph J. Holonich  
March 5, 1997  
Page 3

- EFN request to NRC for the Rhone-Poulenc alternate feed amendment.
- NRC and State of Utah comments and requests for information relative to the EFN request for the Rhone-Poulenc alternate feed amendment.

We believe that use of these guidance materials, supported by our discussions with the NRC, has allowed us to prepare a complete, concise submittal. Therefore, as we discussed with our Project Manager, Jim Park, at White Mesa Mill on January 16, 1997, EFN requests that the NRC please attempt to reply to this request within 30 days of this transmittal date. Please note that in the attached Affidavit, EFN requests that bracketed portions of this revised application, and selected attachments, be treated as confidential. This letter and enclosed application are hereby transmitted as two versions:

1. Complete text with brackets indicating portions of text and the selected attachments to be withheld as confidential; and
2. An edited version of (1) with bracketed text deleted and selected attachments removed. This version is meant to be used for the Public Document Room.

I can be reached at (303) 899-5647.

Sincerely,

*Michelle R. Rehmann*

Michelle R. Rehmann  
Environmental Manager

by

*Rich A. Munson*

MRR/pl  
Attachments



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

April 2, 1997

Energy Fuels Nuclear, Inc.  
ATTN: Mr. Richard Munson,  
Corporate Counsel  
1515 Arapahoe Street, Suite 900  
Denver, Colorado 80202

SUBJECT: REQUEST FOR WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE,  
ENERGY FUELS NUCLEAR, INC., SOURCE MATERIAL LICENSE SUA-1358

Dear Mr. Munson:

By your affidavit dated March 5, 1997, amended by letter dated March 17, 1997, you submitted commercial information and requested that it be withheld from public disclosure pursuant to 10 CFR 2.790. Your affidavit was transmitted by a March 5, 1997, application for a license amendment from Energy Fuels Nuclear, Inc. (EFN) for authorization to receive and process uranium material at EFN's White Mesa uranium mill, located near Blanding, Utah. A non-proprietary version of this amendment application also was submitted.

You stated that the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

- The information is currently held, and is of the type of information that is normally held, in confidence by EFN.
- A competitor's knowledge of the information and associated data could significantly harm EFN's competitive business position.

We have reviewed your application and the material in accordance with the requirements of 10 CFR 2.790 and, on the basis of your statements, have determined that the submitted information sought to be withheld contains proprietary commercial information. Therefore, the version of the submitted information marked as proprietary will be withheld from public disclosure pursuant to 10 CFR 2.790(b)(5) and section 103(b) of the Atomic Energy Act of 1954, as amended.

Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the documents. If the need arises, we may send copies of this information to our consultants working in this area. We will, of course, ensure that the consultants have signed the appropriate agreements for handling proprietary information.

On the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the NRC. You also should understand that the NRC may have cause to review this determination in the

R. Munson

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future, for example, if the scope of a Freedom of Information Act request includes your information. In all review situations, if the NRC makes a determination adverse to the above, you will be notified in advance of any public disclosure.

If you have any questions regarding this letter, please contact the NRC Project Manager for the White Mesa mill, Mr. James Park, at (301) 415-6699.

Sincerely,

(Original signed by)

Joseph J. Holonich, Chief  
Uranium Recovery Branch  
Division of Waste Management  
Office of Nuclear Material Safety  
and Safeguards

Docket No. 40-8681  
License No. SUA-1358

cc: W.Sinclair, UT

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NAME	JPark <i>JRP</i>		DGillen	MSiemien <i>MS</i>		JHolonich	
DATE	3/31/97		3/ /97	3/3/97		3/2/97	

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