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Kennecott Energy

March 2, 1999

40-8904

Mr. N. King Stablein
Acting Chief, Uranium Recovery Branch
U.S. NRC
Two White Flint North
11545 Rockville Pike
Rockville, MD
20852-2738

Re: L-Bar Reclamation – Correction Sheets and Revised Table 4.1.1 for the Alternate Concentration Limits Application (ACL)

Dear Mr. Stablein:

Please find enclosed two copies each of the revised figures for prediction of concentration contours at 200, 500, and 1000 years from present for the L-Bar site. These revised figures should replace the original figures from the ACL submittal dated August 28, 1998.

A nitrate plume of unknown origin had been previously identified in a region east of the tailings basin. Upon examination of the data for metals in wells to the northeast, we found that the area could represent a potential source area for NRC constituents of concern. The corrected isocontour plots for conservative constituents and for two rates of retardation present the result of inclusion of this source to the northeast. Contours of relative concentration from the tailings area and the separate northeast area are simulated separately using the model presented in ACL Appendix B1, then are shown together on the revised figures.

The contours displayed in the northeast have been revised as a result of additional modeling. The conclusions presented in the ACL remain valid, i.e. that predictive isocontours of contaminant concentration remain below the groundwater protection standard at all points of

1/1

NL05

exposure. Contours projected to reach the property line are at concentrations below protection standards as shown on the summary table below.

Constituent	Source Concentration (mg/l)	Relative Concentration	Corresponding Concentration (mg/l)	Groundwater Protection Standard (mg/l)
Uranium (Kd = 0.1 ml/g)	13	0.001	0.013	0.05
Selenium (Kd = 5.0 ml/g)	0.8	0.001	0.0008	0.01

In addition to the corrected figures we have included a revised Table 4.1.1 to correct a typographic error relating to the requested ACL value for Selenium. The table incorrectly presented both 2 mg/l and 6 mg/l. The correct value should be 2 mg/l for selenium, which is less than the maximum value of 6 mg/l recorded in the tailings, but is an order of magnitude above the maximum observed value recorded in groundwater and at the POC wells.

Please call if you have questions or would like additional information.

Sincerely,

John Trummel
On Behalf of Sohio Western Mining Company

Encl: Corrected Figures: 2.2.3.2.1 through 2.2.3.2.3, 2.2.3.3.1 through 2.2.3.3.6
Revised page 55, Table 4.1.1

cc. Katherine Yuhas- NMED (w/enclosure)
Kelly Tilford- Duke Engineering Services (w/o enclosure)

Table 4.1.1 Proposed ACLs and Related Data

Hazardous Constituent	Selenium (Se)	Uranium (U)
Groundwater Protection Standard (MW-29A)	0.01	0.5
Current Max. Concentration @ POC Wells	0.2	3.38
Proposed ACL Value @ POC	2	13
Greatest Predicted Concentration @ POE	<0.01	<0.5

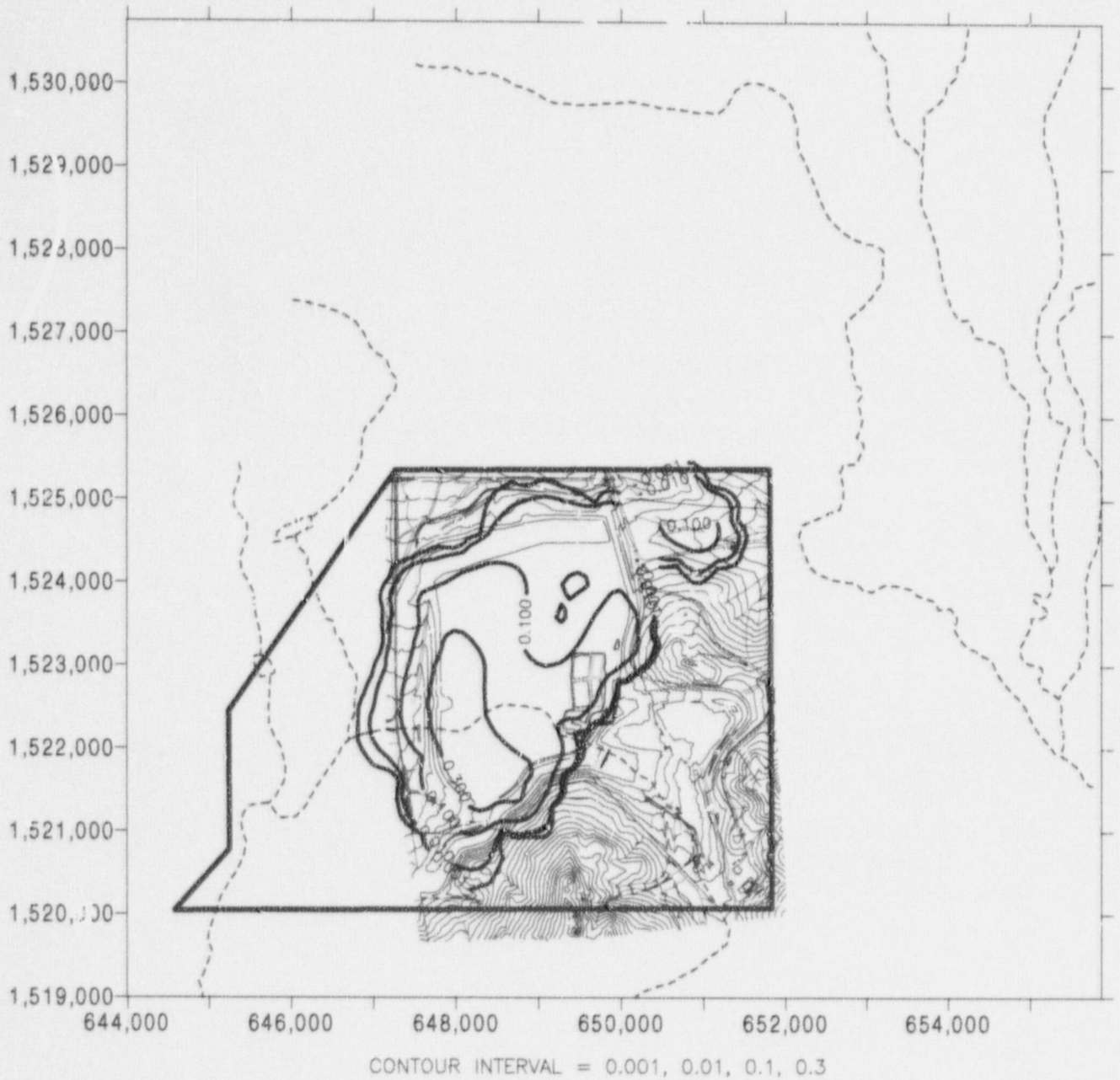
Concentration measured in mg/l.

4.2 Proposed Implementation Measures

SOHIO proposes to proceed with final reclamation construction in 1999. This includes regrading of the cover to bring it back to design grade, and any other construction required as a mitigation measure to address NRC degradation concerns. The tailings fluid collection system and evaporation ponds will be closed during this effort and this will be the last regulated unit at the site. The pumpback well evaporation ponds may be left open, pending final approval of pumpback system shutdown. These will be performed in accordance with the approved reclamation plan.

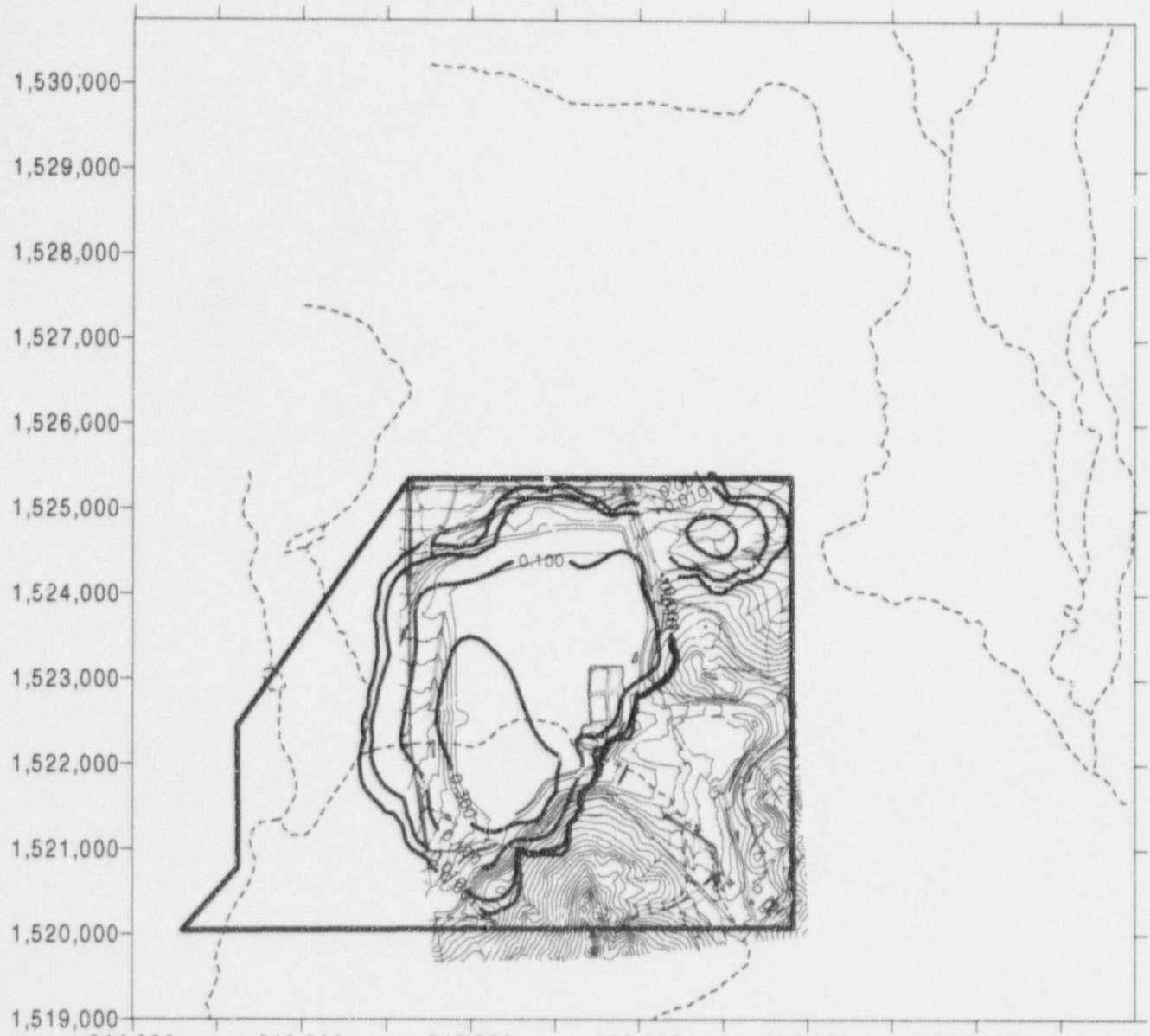
Once the ACL is granted, there will no longer be a need to operate the pumpback system. At that time, the pumpback system will be discontinued, and the pumpback to the evaporation pond will be closed as the final measure for cover construction.

SOHIO will work with the DOE, as required to formulate a long-term surveillance program for the site. At the completion of any required monitoring period, the property will then be transferred to the DOE for long-term custody, and the SOHIO license will be terminated.



Note: Figure derived from plot by Balleau Groundwater Inc.

Date: 2/24/99	**Simulated 200 Year Conservative Constituent Concentrations**	
Proj.: 00137.00.0001.04.00000		
File: c:/..Surfplots.200all2.srf		
DE&S Engineering & Services	**L-Bar ACL Application**	**Figure 2.2.3.2.1**



Note: Figure derived from plot by Balleau Groundwater Inc.

Date: 2/24/99	**Simulated 500 Year Conservative Constituent Concentrations**
Proj.: 00137.00.0001.04.00000	
File: c:/...Surfplots/500all2.srf	

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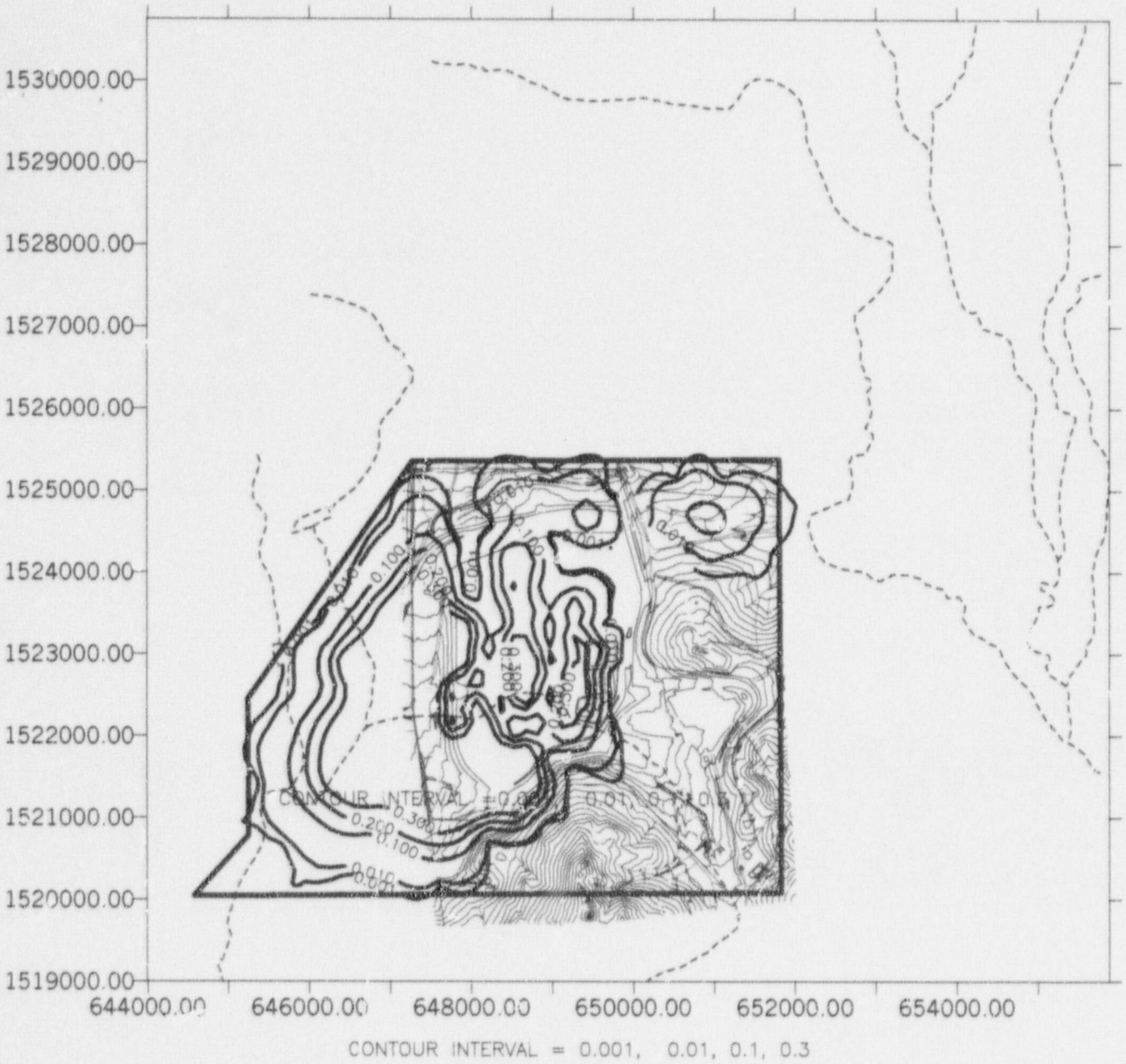
L-Bar ACL Application

Figure 2.2.3.2.2



Note: Figure derived from plot by Balleau Groundwater Inc.

Date: 2/25/99	**Simulated 1000 Year Conservative Constituent Concentrations**	
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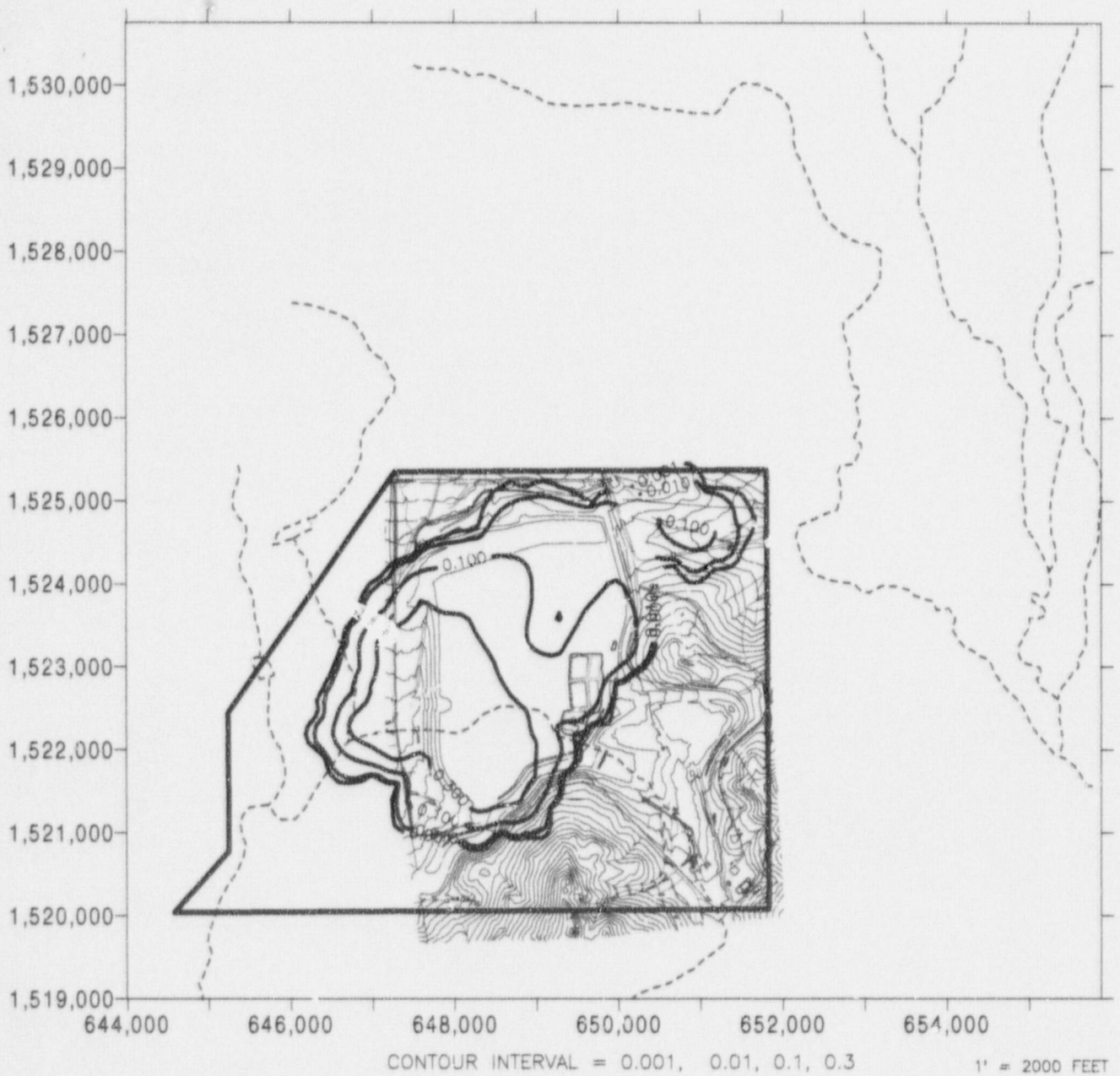
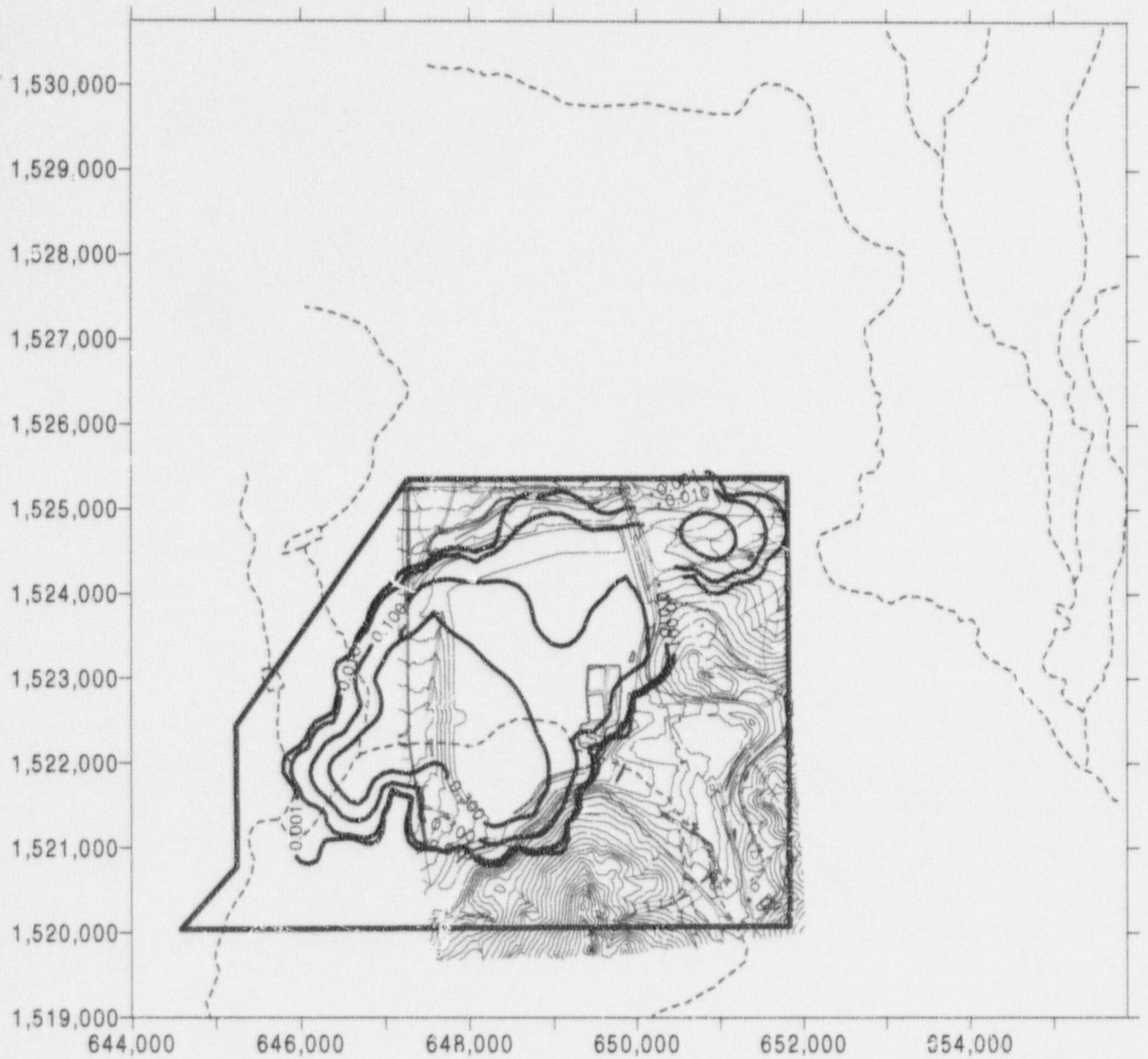
DE&S Duke Engineering & Services	**L-Bar ACL Application**	**Figure 2.2.3.2.3**



Note: Figure derived from plot by Balleau Groundwater Inc.

Date: 2/24/99	**Simulated 200 Year Uranium Concentrations Including Geochemical Effects**	
Proj.: 00137.00.0001.04.00000		
File: c:/...Surfplots/200_U2.srf		
DE&S Duke Engineering & Services	**L-Bar ACL Application**	**Figure 2.2.3.3.1**



CONTOUR INTERVAL = 0.001, 0.01, 0.1, 0.3

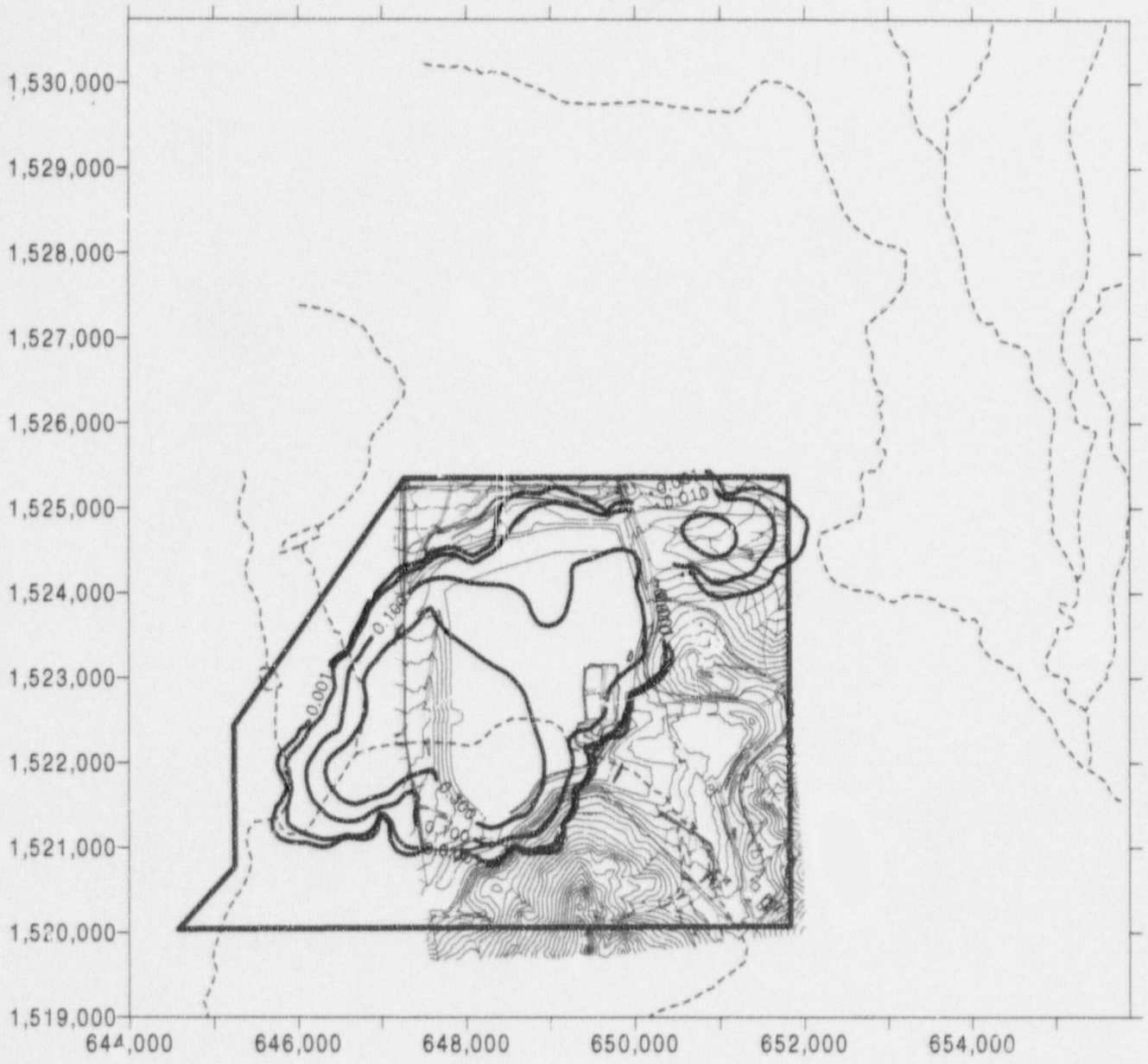
1" = 2000 FEET

PROPERTY LINE

CONTOURS OF RELATIVE CONCENTRATION
(e.g., 0.001 with source of 13 mg/l = 0.013mg/l)

Note: Figure derived from plot by Balleau Groundwater Inc.

Date: 2/24/99	**Simulated 500 Year Uranium Concentrations Including Geochemical Effects**	
Proj.: 00137.00.0001.04.00000		
File: C:/...Surfplots/ 500_U2.srf		
DE&S Duke Engineering & Services	**L-Bar ACL Application**	**Figure 2.2.3.3.2**



CONTOUR INTERVAL = 0.001, 0.01, 0.1, 0.3

1" = 2000 FEET

PROPERTY LINE

CONTOURS OF RELATIVE CONCENTRATION
(e.g., 0.001 with source of 13 mg/l = 0.013mg/l)

Note: Figure derived from plot by Balleau Groundwater Inc.

Date: 2/24/99	**Simulated 1000 Year Uranium Concentrations Including Geochemical Effects**
Proj.: 00137.00.0001.04.00000	
File: c:/..Surfplots/1000U2.srf	

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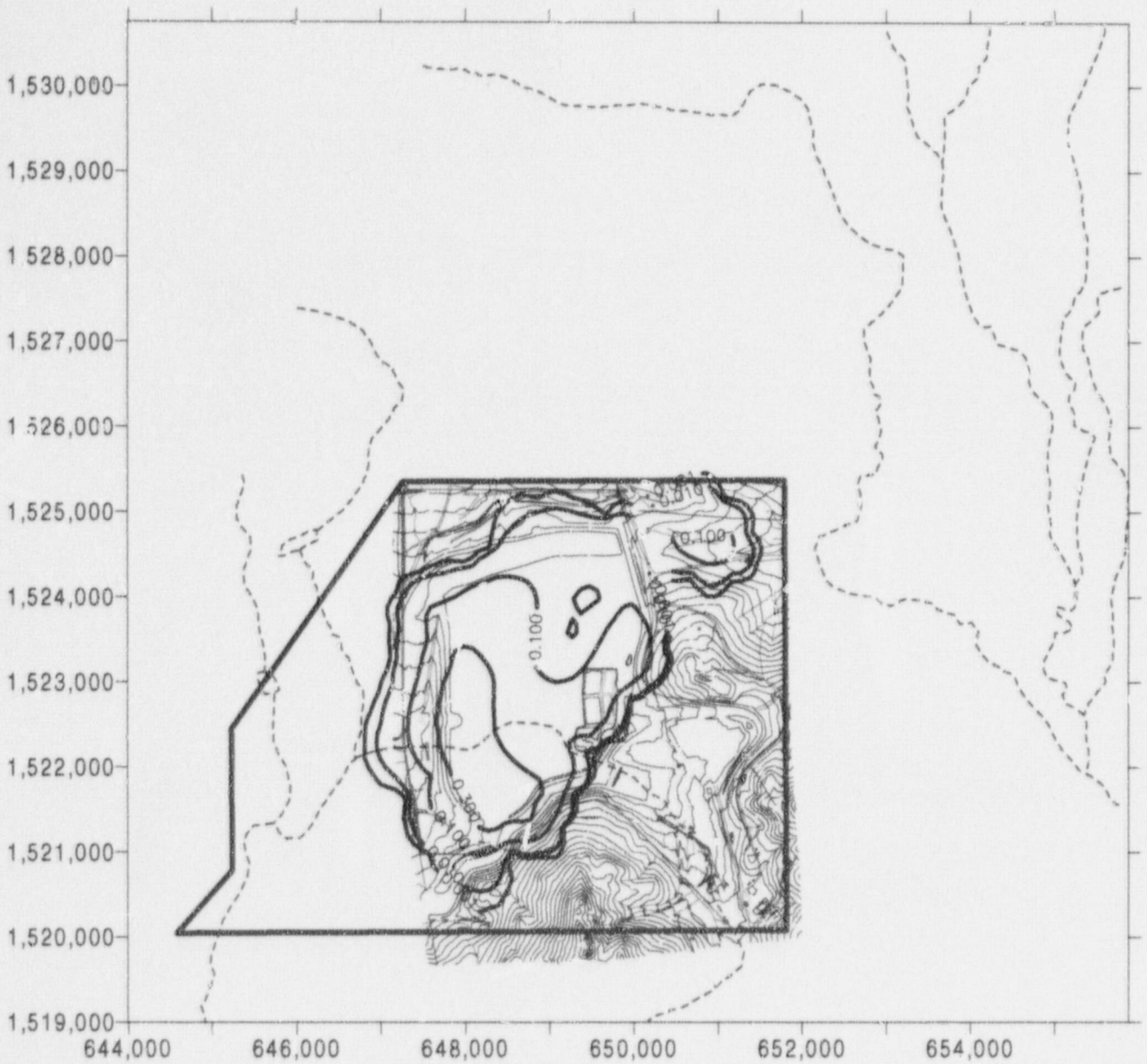
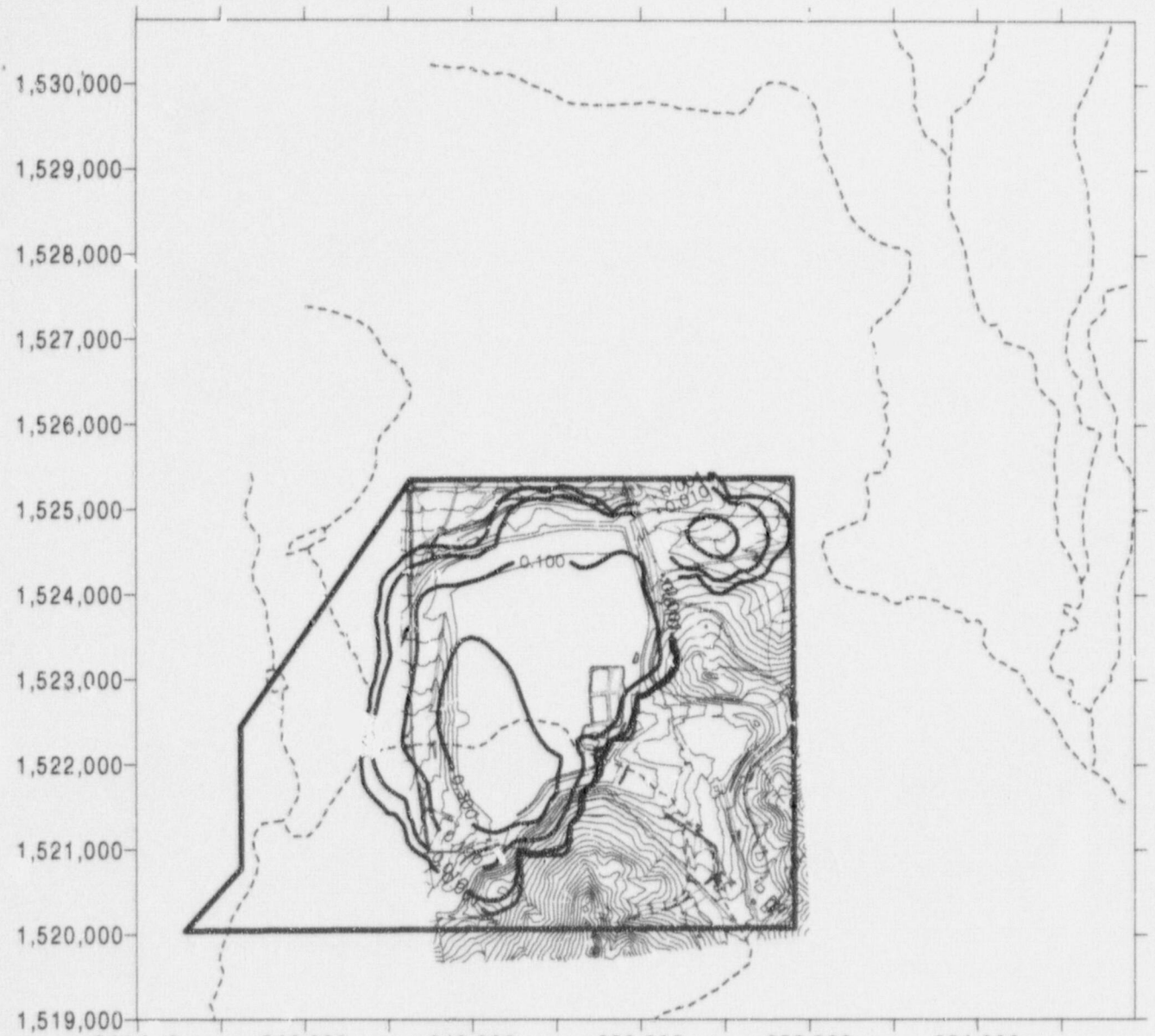
Figure 2.2.3.3.3



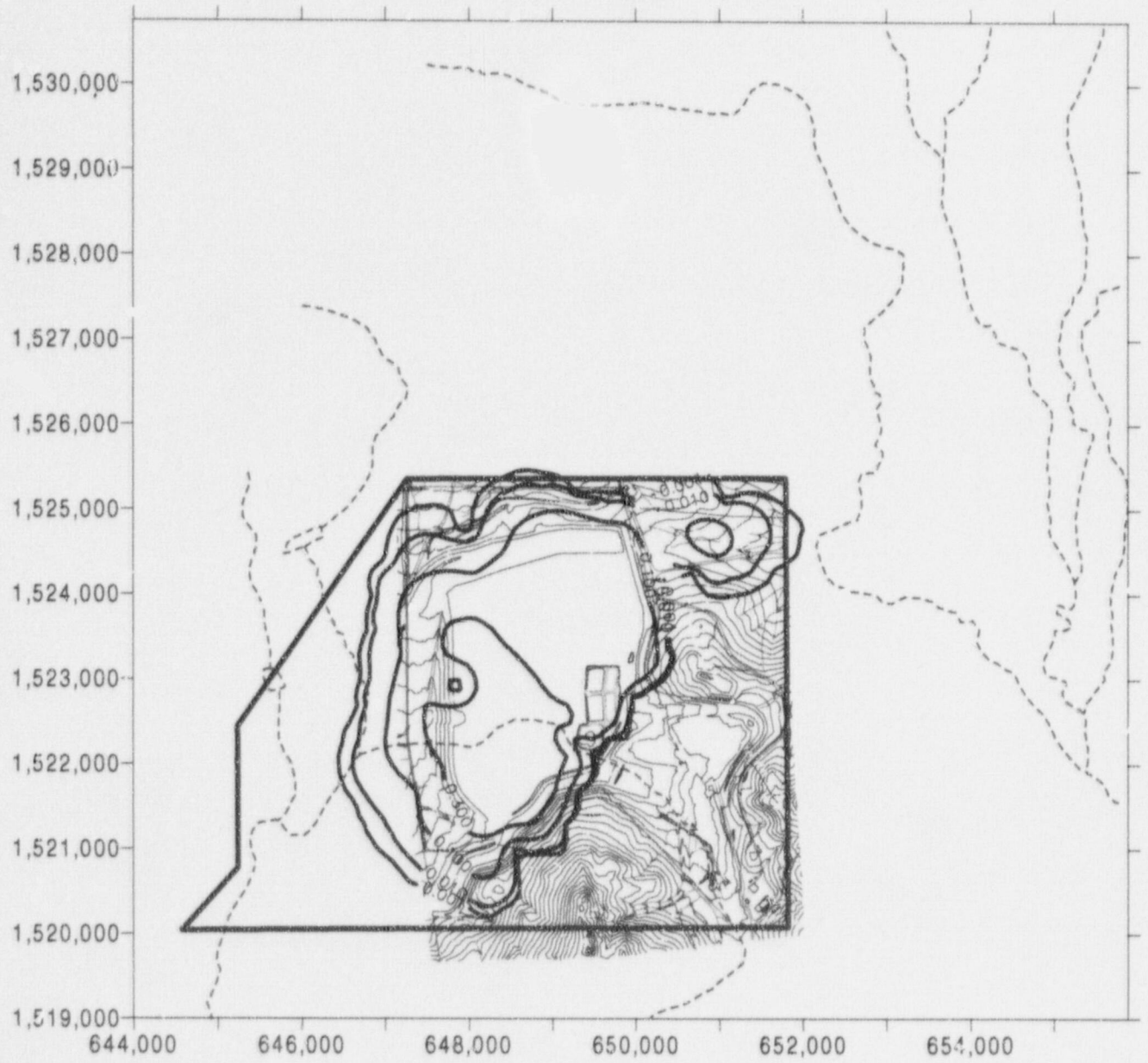
Note: Figure derived from plot by Balleau Groundwater Inc.

Date: 2/24/99	**Simulated 200 Year Selenium Concentrations Including Geochemical Effects**
Proj.: 00137.00.0001.04.00000	
File: c:/..Surfplots.200_Se2.srf	
DE&S Duke Engineering & Services	**L-Bar ACL Application** / **Figure 2.2.3.3.4**



Note: Figure derived from plot by Balleau Groundwater Inc.

Date: 2/24/99	**Simulated 500 Year Selenium Concentrations Including Geochemical Effects**	
Proj.: 00137.00.0001.04.00000		
File: c:/...Surfplots/500_Se2.srf		
DE&S Duke Engineering & Services	**L-Bar ACL Application**	**Figure 2.2.3.3.5**



CONTOUR INTERVAL =C.001, 0.01, 0.1, 0.3

1" = 2000 FEET

PROPERTY LINE

CONTOURS OF RELATIVE CONCENTRATION
(e.g., 0.001 with source of 0.8 mg/l = 0.0008mg/l)

Note: Figure derived from plot by Balleau Groundwater Inc.

Date: 2/24/99	**Simulated 1000 Year Selenium Concentrations Including Geochemical Effects**	
Proj.: 00137.00.0001.04.00000		
File: C:/...Surfplots/1000se2.srf		
DE&S Duke Engineering & Services	**L-Bar ACL Application**	**Figure 2.2.3.3.6**