



INTERNATIONAL
URANIUM (USA)
CORPORATION

Rec'd 4-9-98

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April 8, 1998

Via Overnight Mail

Mr. Joseph J. Holonich, Chief
U.S. Nuclear Regulatory Commission
Uranium Recovery Branch
Office of Nuclear Material
Safety and Safeguards
Mail Stop T7J9
Washington DC 20555-0001

Re: 1994 & 1995 Revision Guides pertaining to the Reno Creek In Situ Permit to Mine Amendment (No. 479 A) and Source Material License Application, Docket No. 40-9048

Dear Mr. Holonich:

Per request by Harold Lefevre during a telephone conversation on March 30, 1998, enclosed please find the following revision guides:

1. Reno Creek ISL Project, November 1994, Amendment Application Revision
2. Reno Creek Permit No. 479 Amendment Application TFN 2 2/309 Index of Changes & Revisions, November 1995

The enclosed revision guides should streamline the review process by identifying the specific areas in the application which have been revised. International Uranium (USA) Corporation is sending these guides to facilitate the NRC and expedite the review process. Please contact me directly at 303-389-4162 if you have any questions or require additional information.

Very truly yours,

Donn M. Pillmore
Project Manager

Enclosures

cc: Harold Lefevre, U.S. NRC, w/ attachments
M.B. Mathisen, w/attachments
M.R. Rehmann, w/attachments
T.V. Wetz, w/attachments

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RENO CREEK ISL PROJECT
NOVEMBER 1994 AMENDMENT APPLICATION REVISION

FORM 1	New Form 1 provided to list new EFNI personnel and revised total for affected acreage
TABLE OF CONTENTS	Revised to incorporate new page numbering, figures, tables, plates, and attachments
SECTION 1	Text revised to incorporate accepted changes and grammatical corrections
SECTIONS 2 & 3	Provided new list of Landowners within Permit Area; this list incorporates ownership changes and grammatical corrections Provided new list of Landowners within 1/2 mile of Permit Area; this list incorporates ownership changes and grammatical corrections Provided Consent Forms not previously received -from Robert Roush and the State of Wyoming Provided new Figures 2.1, 2.2, and 2.3 to match updated landowner lists and to correct grammar Provided updated Master Mailing Notification List; this list incorporates ownership, address, and grammatical corrections
SECTION 4	Text revised to incorporate accepted changes and grammatical corrections
SECTION 5	Text revised to incorporate accepted changes and grammatical corrections
SECTION 6	No changes - not resubmitted
SECTION 7	Text revised to incorporate accepted changes and grammatical corrections
SECTION 8	No changes - not resubmitted
SECTION 9	Text revised to incorporate accepted changes and grammatical corrections. Figure 9.3 resubmitted for reverse page placement
SECTION 10	Text revised to incorporate accepted changes and grammatical corrections Revised Table 10.3-1 Basic Well Data-Remove RI-15U Revised Table 10.3-3 Summary of Aquifer Characteristics Remove RI-15U Revised Table 10.3-4 Water Level Data-Project Wells-Remove RI-15U Revised Table 10.3-5 Groundwater Quality Data-Remove RI-15U Added Table 10.3-5a, Criteria for Designation of Outliers on Table 10.3-5

Revised Figure 10.4-1 Permitted Groundwater & Surface Water & add EF wells-Remove RI-15U
 Revised 10.4.2.3 Well Completion Information;
 Revised 10.4.2.2.1 Active Permits Within Permit Amendment Area; Revised 10.4.2.2.3 Active Permits Within One-half Mile of Permit Amendment Area
 -to include additional wells drilled since submittal, completion information on completed wells, and to reflect assignment of Union Pacific Minerals and Rocky Mountain Energy Wells to Energy Fuels. These are not completeness responses, but rather these revisions were provided to keep the application information current.
 Revised Plate 10.5-1, Hydrologic Monitoring Site Locations, removed RI-15U
 Revised Table 10.5-6, Permit Hydrologic Monitoring, removed RI-15U
 Revised Attachment 10.1 Pump Test, Section 10-B text, figures, and tables were revised to remove RI-15U

- SECTION 11 Text revised to incorporate accepted changes and grammatical corrections.
 Revised Attachment 11.1-new lead page and new separator pages
 Added Attachment 11.1-8 and 11.1-9-soil analytical results and soil series descriptions for new soils sampling sites
 Revised Plate 11.1-Baseline Soil Inventory-added new soil sample sites
 Revised Table 11.1-Topsoil Volume Summary-to incorporate additional topsoil removal areas not included in original submittal
- SECTION 12 Revised Plate 12.1 to include accepted changes
 Added Attachment 12.1-1994 Wetlands Assessment
 Text revised to incorporate accepted changes and grammatical corrections
 Added Plate 12.2-Wetland Assessment map
- SECTION 13 Text revised to incorporate accepted language and grammatical corrections
- SECTION 14 Revised text with grammatical changes only
- SECTION 15 Text revised to incorporate accepted language and grammatical corrections
 Revised Plate 15.1-Mine Plan, to show Disturbance Area Boundary, channel crossings, etc.
 Section 15.10 (Land Application) removed entirely and replaced with a commitment by EFN to incorporate language from the LAFPA, upon its approval

Added Figures 15.3a, 15.3b, 15.3c, 15.3d, 15.3e
-for channel crossings designs

SECTION 16 Text revised to incorporate accepted language and
 grammatical corrections
 Added Attachment 16.2-Raptor Mitigation Plan

SECTION 17 Text revised to incorporate accepted changes and
 grammatical corrections.
 Revised Plate 16.1, Environmental Monitoring Site
 Locations, removed RI-15U

SECTION 18 No changes - not resubmitted

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Location in Amendment Application (11/94)	Section	11/95 Revisions	Nature of Action
<u>TEXT VOLUME I</u>			
p. 1-1	1.1	p. 1-1	Revised General Project Description text to include alternative for phased development with a full plant facility.
p. 1-2	1.4.1	p. 1-2	Revised reference to targeted Wasatch sands. Revised project total flow capacity statement.
p. 1-4	1.4.2	p. 1-4 & 1-4a	Added text concerning the facility proposed for processing resin, per NRC comments. Added text concerning impacts to aquatic resources, per NRC comments.
			Revised description of processing plant to include full recovery plant alternative.
P. 1-5	1.4.2	p. 1-5	Revised statement regarding location of project offices, lab, and lunch facilities.
p. 5-1	5.2	p. 5-1	Revised kilometers to miles and corrected distance to nearest residence.
p. 7-1		p. 7-1 & 7-2	Added text & Addendum I regarding SHPO letters of concurrence.
p. 8-1 thru 8-13		p. 8-1 thru 8-26	Section 8 replaced in its entirety to incorporate information requested by NRC.
p. 9-2		p. 9-2	Replaced Figure 9-1 with revised Figure 9-1 per NRC comments.
p. 9-4		p. 9-4	Replaced Figure 9-2 with revised Figure 9-2 per NRC comments.

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p. 9-9		p. 9-9	Figure 9-4 replaced by version with correct title block; incorrect copy inadvertently inserted in 11/94 update.
p. 9-10	9.6	p. 9-10 & 9-10a	Added to list of seismic events in text.
p. 9-11	9.8	p. 9-11 thru 9-18	Added Section 9.8, Hydrocarbon Exploration/Exploitation.
N.A.		p. 9-18	Inserted Figure 9.5, Oil Well Location Map, per NRC request.
N.A.	9.9	p. 9-19 & 9-20	Added Section 9.9, Geologic References.
p. 10-19	10.3.3	p. 10-19	Inserted field test methods to be used to verify aquifer permeability.
p. 10-45	Table 10.3-5A	p. 10-45	Replaced Table 10.3-5A to add units of measure.
p. 10-94		p. 10-94	Inserted text regarding commitment to plug Highway 387 construction wells if in limits of monitor well network.
p. 10-98 & 10-99	10.5.2	p. 10-98 & 10-99	Revised text to clarify spacing between monitoring wells and distance between monitoring wells and wellfield.
p. 10-100	10.5.4	p. 10-100	Restated Section 10.5.4., Permit Monitoring.
p. 10-117		removed	Deleted Table 10.5-6, Permit Hydrologic Monitoring.

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<u>Location in Amendment Application (11/94)</u>	<u>Section</u>	<u>11/95 Revisions</u>	<u>Nature of Action</u>
p. 11-5		p. 11-5	Revised and updated Table 11.1, Top Soil Volume Summary, with corrected topsoil volume to match new Table 15.8.
p. 12-6	12.2.10	p. 12-6 & 12-6a	Inserted text stating that stock ponds would be restored if they are removed in the course of mining operations.
p. 12-10 & 12-11	12.3.5.1	p. 12-10 & 12-11	Corrected references to Tables 12.3.2 & 12.3.5.
p. 13-15	13.3.6	p. 13-15 & 13-15a	Modified text pertaining to Black-footed ferrets in accordance with NRC comment.
p. 13-16	13.4	p. 13-16 & 13-16a	Modified last two sentences of Section 13.4 in accordance with NRC comment concerning impact assessment.
p. 13-17	Appendix 1	p. 13-17	Submitted revised first page of Appendix listing potential and observed species; Appendix title revised (removed "mammalian").
p. 14-1	14.1.1	p. 14-1	Corrected reference to location of land application area in Section 33.
p. 14-5	14.1.3	p. 14-5	Corrected reference to text location of soil analytical results.
p. 14-8	14.1.6	p. 14-8	Corrected reference to Table 14.3. Corrected numbering of Table 14.2 to 14.3. Replaced Table 14.3 to include additional data collected.

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p. 14-9	14.1.7	p. 14-9	Changed monitoring commitments from Upper Aquifer to "next overlying aquifer." Revised last paragraph in 14.1.7 to clarify comparison of water quality between the Upper Aquifer and the Ore Sand.
p. 14-11	14.2	p. 14-11 & 14-11a	Added sections describing possible accidents involving shipment of yellowcake slurry.
p. 14-13		p. 14-13	Replaced Table 14.4 to include complete radon sampling data.
p. 15-1	15.1	p. 15-1	Revised text reference to satellite plant.
p. 15-5	15.4	15-5 & 15-5a	Inserted paragraph describing phased development approach, including a full recovery plant.
p. 15-6 & 15-7	15.4	p. 15-6 & 15-7	Revised text to include past acid ISL test.
p. 15-21 thru 15-23	15.7.1	p. 15-21, 15-22, 15-22a, 15-23	Revised text to clarify procedure for placement of cement slurry during cementing of casing. Revised text to incorporate commitment to record cement hold-back pressure during well completion. Revised text regarding use of open hole completions for monitor wells.

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p. 15-23	15.7.2	p. 15-23	Replaced text for this section to incorporate specific sequence of steps in mechanical integrity testing of wells.
p. 15-27	15.7.2	p. 15-27	Removed sentence stating that well screen would be set after MIT is run.
p. 15-33	15.8.5	p. 15-33	Inserted statement that buildings will set on reinforced concrete slabs, per NRC comment.
p. 15-34		p. 15-34	Replaced Figure 15.9, Satellite Building; previous revision was copied off center and figure number was obscured.
p. 15-37	15.8.6	p. 15-37 & 15-37a	Added modified text to reflect description of ion exchange column "V7" in Figure 15.11. Added sand filters for Reverse Osmosis System to Major Equipment List. Added capacities for storage tanks.
p. 15-38		p. 15-38	Replaced Figure 15.11 to show additional circuitry, as requested by NRC.
p. 15-45	15.12	p. 15-45	Inserted text to reference Table 15.8, Topsoil Salvage Volumes.
p. 15-46	15.12	p. 15-46	Inserted revised total topsoil salvage volume.
N/A		p. 15-47	Inserted Table 15.8, Topsoil Salvage Volumes.

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N/A	15.13 thru 15.24	p. 15-47 thru 15-67	Added sections describing the chemistry, processing plant, waste water treatment, and project schedule for the full plant phase.
p. 16-2	16.1.1.1	p. 16-2	Removed reference to regional groundwater monitoring.
p. 16-3	16.1.1.2	p. 16-3	Removed use of standards in baseline sampling; the analytical lab provides these.
p. 16-5	16.1.1.4	p. 16-5 & 16-5a	Inserted text, as requested by NRC, concerning selection of chloride as a monitoring parameter.
p. 16-6	16.1.1.5	p. 16-6	Added language committing to conduct full suite water quality analyses if an excursion is not controlled in 30 days. Changed confirmation notice for an excursion from seven days to five days.
p. 16-7	16.1.2.2	p. 16-7	Changed commitment to require minimum of 14 days, rather than 2 weeks, between baseline sampling events.
p. 16-10	16.1.3	p. 16-10 & 16-10a	Revised language to incorporate field analysis to test solutions recovered from the treatment pond leak detection system.
p. 16-11	16.2	p. 16-11	Removed strike-out parameters from Table 16.2.

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p. 16-21 & 16-22	16.8	p. 16-21 & 16-22	Revised language to conform with the revised language in 16.1.3 regarding sampling treatment pond leak detection system and reporting of results.
p. 17-1	17.1	p. 17-1	The word "immediately" was removed from the 1st sentence of Section 17.1, because sufficient time must be allowed before starting restoration for mining to progress beyond a mine unit to prevent drawdown. Corrected reference to Table 15.7, Mine and Restoration Schedule.
p. 17-2	17.1.3	p. 17-2	Corrected reference to Table 15.7, Mine and Restoration Schedule.
p. 17-9		p. 17-9	Added title to Table 17.1, Final Reclamation Seed Mix.
p. 17-12	17.2.5.2	p. 17-12	Added reference to Table 17.2 (Sampling Commitments) to second to last paragraph of Section 17.2.5.2.
N/A		p. 17-12a	Inserted Table 17.2, Summary of Field Vegetation Sampling Commitments for Bond Release.
p. 17-12	17.3	p. 17-12 b & c	The section for well abandonment procedures has been revised in its entirety to incorporate materials specifications and well plugging procedures consistent with WOD Rules and Regulations.

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Location in Amendment Application (11/94)	Section	11/95 Revisions	Nature of Action
p. 17-16	17.4	p. 17-16	Revised language to state that, for purposes of bond estimation, the use of a neat cement slurry was assumed for well abandonment.
p. 17-25	17.4.2.2	p. 17-25	Revised language to state that, for purposes of bond estimation, the use of a neat cement slurry was assumed for well abandonment.
p. 18-16	18.2.2.1	p. 18-16	Incorporated accepted language on injection pressure limitation.
PLATES, VOLUME II			
Plate 10.2-1		Plate 10.2-1	Added 'WQ' designation to regional water quality sampling well.
Plates 10.3-1 and 10.3-2		Plates 10.3-1 and 10.3-2	Modified well name characters to show wells used in piezometric surface mapping and wells used in pump tests.
Plate 10.5-1		Plate 10.5.1	Remove Plate 10.5-1; regional monitoring will be incorporated into NRC project monitoring program.
Plate 15.1		Plate 15.1	Added road to oxygen tank in Mine Unit 1.
		Plate 15.6 (new)	Added Mine Plan plate 15.6 full plant phase; includes location and access to deep injection wells.