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September 17, 1999

U. S. Nuclear Regulatory Commission
Division of Waste Management, MST7J9
Attn. Mr. John Surmeier, Chief
Uranium Recovery Branch and Low Level Branch
11555 Rockville Pike
Rockville, MD 20852

Re: Docket No. 40-8698 Shootaring Canyon Mill
License No. SUA- 1371
Biological Assessment

Dear Mr. Surmeier:

This letter is in response to our August 16, 1999 letter requesting a biological assessment for Shootaring Canyon uranium mill site. Enclosed is the wildlife monitoring and mitigation plan for the Shootaring Canyon mill site. You will notice that Plateau Resources Ltd. will monitor for one year then develop a mitigation plan should a mitigation plan be required.

Also, Plateau Resources Ltd. will conduct site-clearance surveys for Jones Cycladenia prior to any new ground disturbing activities and avoid disturbance to identified plant locations.

As per this letter Plateau Resources Ltd. will not be required to complete a biological assessment. Should you have any questions please contact me at (307) 856-9271.

Sincerely,
Plateau Resources Ltd.

F. R. Craft

Enclosure

xc: C. Johnson
File

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**Wildlife Monitoring Plan for
the Tailings Facility of the
Shootaring Canyon Uranium Mill
Garfield County, Utah**

Overview

1. After the mill begins to operate, a one-year monitoring program will be commenced for the purpose of determining what species of wildlife use the impoundment and the extent of mortalities.
2. Following the completion of the one year of monitoring, a mitigation plan that addresses the specific issues identified during monitoring would be developed.

Monitoring Plan

The one-year monitoring plan would involve a daily visual inspection of the tailing impoundment by plant personnel. During this inspection all wildlife observed proximal to the impoundment will be documented and the surface and edges of the impoundment will be searched for dead birds or animals. Carcasses will be classified into the following general categories and documented on the daily-inspection form:

<u>Birds</u>	<u>Birds</u>	<u>Mammals</u>	<u>Herptiles</u>
Seagull	Small waders	Rodent	Lizard
Pelican	Dove/Pigeon	Rabbit	Snake
Duck	Nighthawk	Coyote	Salamander
Goose	Kingfisher	Fox	Toad
Heron	Woodpecker	Badger	Frog
Bird of prey	Perching birds	Deer	
Quail	Swan	Pronghorn	

Plant personnel would be formally trained in the identification of these classes of wildlife by a qualified biologist and instructor and be given identification guides for use on the site. All mortalities will be photographed for the record and for future reference and verification of identifications. Annual refresher sessions on wildlife identification will be conducted by one of the plant foremen or supervisors. The identification of wildlife to the species level will be done where feasible. Colored identification guides of the federally-listed Threatened and Endangered species that could potentially occur in the Shootaring Canyon Mill area will be provided to plant personnel and be reviewed during the instruction sessions.

If, during the initial monitoring phase, it becomes apparent that significant offsite impacts may be occurring, immediate action to avoid such impacts will be taken and an action plan that is approved by the FWS and NRC will be implemented.

Site-clearance surveys for Jones Cycladenia will be conducted prior to new ground disturbing activities. Areas where the plant is found will not be disturbed.