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40-8904

March 23, 1989

Edward F. Hawkins, Chief Licensing Branch Uranium Recovery Field Office Region IV 730 Simms, Suite 100 Golden, CO 80401



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89-0509

Re: NRC Letter of March 17, 1989, Docket #40-8904

Dear Mr. Hawkins:

We are in receipt of your letter of March 15, 1989 regarding the L-Bar Reclamation Plan submitted February 27, 1989. On behalf of BP America, Inc. INTERA will respond to the issues raised in the letter. These have already been discussed by phone with NRC personnel on March 21, 1989 and NRC agreed that the changes were not as major as the cursory review indicated.

First, it is also our understanding that all parties had reached agreement on all issues and designs concerning the L-Bar Reclamation and Closure Plan. As such, the February 1989 submittal is a compilation of all previous agreements including those listed in the January 6, 1989 letter. Our understanding was that the February submittal was to be a stand-alone document so NRC would not have to refer to the numerous correspondences which have been transmitted during the course of coming to agreement on all closure items. It was also our understanding that the submittal was to contain all information required to judge the adequacy of the closure plan including figures, cross-sections, calculations and data. As such we believe there are no extraneous materials in the plan. In fact, significant effort went into updating the plan by removing extraneous materials including unnecessary discussions, figures and tables. All figures were carefully reviewed and renumbered to fit this submittal. We purposely kept the verbiage to a minimum relying on design drawings and tables to show most of the closure detail. All data and calculations were placed in appendices to not distract from the plan but to be available for review. All reference to ground water remediation was removed since it is being addressed separately as per an NRC request.

It was also our understanding that figures and plates should show, to the extent possible, the "as built" nature of the closure. For example, our earlier submittal pertaining to radon barrier thickness used a single generic cross-section as a model. However, the tailings area is essentially saucer shaped, lower in the middle and higher around the edges. The materials in the impoundment are

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also not uniformly distributed with slimes and waste ore located in the central portion of the impoundment and sandy tailings around the edges. To bring the cover to the final grade more radon barrier material must be placed in the central parts of the impoundment where the highest emanation materials are to be buried. In order to better illustrate the actual "as built" nature of the reclaimed tailings area, we constructed five cross-sections through the area illustrating the locations and depths of the various materials as they are actually being covered. All modeling calculations are included in a single appendix while data parameter values and a comparison of calculated versus design thicknesses are provided in separate tables. We feel this exercise answers NRC's request to show cover design as close as possible to "as built" in a way which should require minimal additional NRC review time. This does not entail a major change in overall design but rather represents a more detailed submission providing the best available information.

Another NRC concern pertains to apparent changes in channel design and stationing. The minor stationing changes are simply refinements to the earlier numbers. No significant design changes result. Also, the construction of the evaporation cells on the east side of the impoundment required the movement of the G5 channel slightly to the east. We do not believe this will impact the diversion system performance. The design of the south channel outlet has been changed because construction information has revealed the earlier design could not be accommodated. We believe the new design is an improvement over the earlier design because of the low slope, more effective use of rock material and because an arroyo diversion removes a head cutting potential present in the earlier plan and results in less water being discharged at the south outlet.

Regarding the surety submission, the January 6, 1989 NRC letter specifically says that this submission will be made upon final approval of the reclamation plan. It is still our intent to make the surety submission upon final approval of the reclamation plan, per NRC request.

Considerable effort was put into making the plan concise, upto-date and accurate, yet inclusive of all appropriate information needed for plan review and approval. We hope this letter clarifies

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the plan submittal and leads to a prompt plan approval. If you have any questions, please do not hesitate to call.

Sincerely,

Chomas Osion

T.G. Osborn Project Manager

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cc: Ralph DeLeonardis G.E. Grisak Greg Lewis, NMEID

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