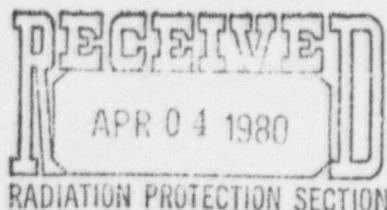


# Gulf Mineral Resources Co.



1720 South Bellaire Street  
Denver, CO 80222

March 31, 1980

4/4/80

Mr. James L. Mackin  
New Mexico Environmental Improvement Division  
P. O. Box 968  
Santa Fe, New Mexico 87503

RE: Mt. Taylor Uranium Mill Project Mill License  
Application and Revised Groundwater Discharge Plan

Dear Mr. Mackin:

Forwarded herewith is the information requested in your letter of March 19, 1980 but not provided in my letter to you dated March 28, 1980.

I. Responses to questions and considerations raised at the March 6, 1980 meeting in Santa Fe, as enumerated by K. H. Rasmussen in a memo dated March 10, 1980. Responses to items 7, 9 and 10 follow.

- 7) Consider proposing an inspection program of the PVC liners in the pipeway containment basins.

During the daily inspection of the tailings pipeline by vehicle, the catchment basins will also be observed to verify the integrity of the earthen cover which will overlie the PVC liner. A walk-around inspection of each basin will be made quarterly as well as following each storm event. If the synthetic liner becomes exposed, it shall be inspected to determine if significant deterioration has occurred. If the liner has any punctures or tears, or if the liner exhibits any signs of significant deterioration, it shall be repaired and the cover material replaced.

- 9) Confirm that the vacuum breakers on the pipeline will be automatically operated (in order to prevent siphoning of fluid in the pipeline from beyond adjacent high points).

A flow differential of 10 percent between the inlet flowmeter at the tailings pump station and the outlet flowmeter at the tailings disposal area will trigger shutdown of the tailings pumping system. An interlock system will, at the same time, commence vent valve opening. The status of all valves will be displayed in the control room. Start-up of the tailings pumping system cannot begin until all vent valves are closed and the status indicator in the control room verifies that fact.

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Mr. James L. Mackin  
March 31, 1980  
Page Two-

10) Propose a maintenance schedule for flowmeters and other instrumentation on the pipeline.

The maintenance schedule followed will reflect operational experience and may be adjusted to provide more or less frequent inspection based upon demonstrated operational needs. The following schedules will be initiated at the outset of operation.

Magnetic Flowmeters (Magmeter) - Each magmeter will be visually inspected daily. A magmeter calibration check will be accomplished once a month using the vendor's recommended test procedure which will provide a standard signal through the entire system including the signal and reference cables between the transmitter and sensing head. The calibration and testing can be accomplished in fifteen minutes. This calibration procedure will also be performed after shutdowns of the tailings pumping system. During this calibration procedure, the automatic leak detection system will be overridden and put on bypass position.

In the event of malfunction of the magmeter or its components, replacements can be obtained immediately with warehouse spares. Any or all magmeter components can be replaced in approximately one-half hour.


The differential flow monitoring device will be situated in the control room and will be checked daily for proper operation. A self-diagnostic system built into this device will be used for testing for malfunction.

Tailings/Decant Vent Valves - Vent and drain valves will be inspected for leaks daily and will be maintained as necessary. Vent valve head tanks will be inspected daily during winter operation and once a week during non-winter operation. Inspection will consist of verifying that the drain hole is not plugged. Valve limit switches and panel indicator lights will be checked annually.

A response to your request for an analysis of the consequences of a break in the evaporation pond dam will be forwarded in the near future.

Very truly yours,

GULF MINERAL RESOURCES CO.

  
W. L. Rogers, Manager  
Environmental Affairs

WLR:KHR:rw

cc: B. Gallaher, NMEID Water Pollution Control Bureau  
D. Schreiber