

UNITED NUCLEAR CORPORATION



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January 17, 1995
UNC-ABQ-95-084

*Received 1/20/95
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Orig etc & 2 copies rpt.
to Susan Friday
cy to Labby Hamdan*

U.S. Nuclear Regulatory Commission
Division of Waste Management, M.S.T-7J9
ATTN: Joseph J. Holonich, Chief
High Level Waste and Uranium Recovery
Projects Branch
11555 Rockville Pike
Rockville, MD 20850

Re: SUA-1475 1994 Ground Water Corrective Action Plan Report
and License Amendment Request

Dear Mr. Holonich:

Enclosed for your review are five copies of United Nuclear Corporation's Ground Water Corrective Action Plan Annual Report in accordance with Condition 30 of our license No. SUA-1475. Please note that the report was prepared to serve a dual purpose. First it serves as the five year report required by the Environmental Protection Agency in its Administrative Order issued to United Nuclear on July 3, 1989. Secondly, it serves as the Annual Report required by our NRC license.

Please be advised that United Nuclear considers this submittal a request for amendment of its license to reflect the recommendations contained in the report. In summary the recommendations are that;

1. remedial action in Zone 1 be deemed complete as a result of successful dewatering and that United Nuclear be allowed to discontinue operation of the Zone 1 seepage collection system. The formation should continue to be monitored to gather data useful in preparing an Alternative Concentration Limits application.
2. remedial action in the Southwest Alluvium be deemed complete as demonstrated by the fact that the water quality of water produced from the southwest seepage collection system is essentially the same as the water quality in the upgradient background alluvium.
3. the monitoring program be modified to reduce the sampling frequency for all constituents analyzed from quarterly to semiannually in the first and third quarters of each year. Water levels would continue to be measured every quarter.


Enclosure 1

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Because of the complexity of the issues presented in this report and the importance and implications of the findings by NRC and EPA, we suggest that it would be in all of our best interests to hold a technical meeting in the near future. In such a meeting United Nuclear and its consultants and NRC and EPA and its technical staff could discuss the report in more detail allowing you to get a better understanding of the reasoning and rationale presented. At that time NRC and EPA could also obtain answers to technical questions that arise from their review.

We believe that such a meeting held in the near future would be very beneficial for all of us even prior to NRC and EPA having completed detailed review. A meeting in the time frame 30 to 45 days after receipt of the report is suggested. Please advise us if you agree that such a meeting would be of value.

Sincerely,


Juan R. Velasquez

cc: Shawn Ghose - EPA
Ed Morales