

**From:** "Donna L. Wichers" <dwichers@cogema-mining.com>  
**To:** "Stephen Cohen" <SJC7@nrc.gov>  
**Date:** 1/9/06 10:58AM  
**Subject:** RE: COGEMA Surety Estimate

Steve:

1. Correct ... transportation does include partial truck loads. In reality we of course will be sending full truck loads. But we will be shipping materials from all sources, such as plant, wellfield, ponds, etc. If we round all truck loads up to full loads from each spreadsheet we will be over estimating the amount of shipments. If we total up all the shipments from all sources, we will be very close to the estimate for loads sent.

2. I see two issues here. As far as the surety goes, I think that the costs for disposing at Shirley Basin are reflective of the costs that would be charged at any other 11(e)2 byproduct disposal facility. In fact, our rates at Shirley Basin are higher than what PRI and Crow Butte have paid at White Mesa (we charge \$11/cubic foot for most materials whereas White Mesa charges on a bulk rate for everything, say \$100 per cubic yard - i.e. our rates are almost 3 times that.) Transportation costs would be higher for us assuming the use of another facility such as White Mesa. But if we list another facility, then past NRC practice has been to require us to have a contract with that facility. I do not want to sign a contract with another facility as long as we are able to use our own.

Now the second issue. COGEMA will always want to keep our waste at our own facility if at all possible for legal, liability, etc., reasons. The Shirley Basin plan is to complete the tailings reclamation this year, including the ISL disposal area. However, it is obvious that we will need to keep the ISL area open to receive byproduct from Irigaray and Christensen, as well as our Texas operations. This is why we asked NRC last year at the Denver meeting if it would be possible to turn over the tailings to DOE, but keep the ISL area open (no tailings there). This seems to be a bigger issue than the COGEMA surety.

I would think that this is an issue that NRC may wish to look at for all Wyoming/Nebraska ISL facilities. Shirley Basin is central to those facilities, is now open and receiving ISL waste, and it makes sense to keep that portion of the site open to receive this waste for the future (we at least must do this for our own waste). We are not certain of the future of other disposal facilities. I have heard that PRI wants to build their own ISL disposal facility ... the question is, will NRC allow that if Shirley Basin is available, or other disposal facilities?

Not sure I answered your questions ... let me know.

Donna

-----Original Message-----

**From:** Stephen Cohen [mailto:SJC7@nrc.gov]  
**Sent:** Monday, January 09, 2006 5:39 AM  
**To:** dwichers@cogema-mining.com  
**Subject:** COGEMA Surety Estimate

Donna:

I have two quick questions on the surety, so far:

1. Transportation line item costs appear to include partial truck loads (i.e. 1.5 loads). Shouldn't these items be rounded up to the nearest whole truck load.
2. The surety assumes that Pathfinder Shirley Basin will accept COGEMA's waste; however, won't this facility be closed during this year? If so, the surety should reflect costs for disposing waste at another facility.

Steve

**Mail Envelope Properties (43C28810.60B : 11 : 30219)**

**Subject:** RE: COGEMA Surety Estimate  
**Creation Date:** 1/9/06 11:00AM  
**From:** "Donna L. Wichers" <dwichers@cogema-mining.com>  
**Created By:** dwichers@cogema-mining.com

**Recipients**

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OWGWPO01.HQGWD001

SJC7 (Stephen Cohen)

**Post Office**

OWGWPO01.HQGWD001

**Route**

nrc.gov

**Files**

MESSAGE

Mime.822

**Size**

3116

4422

**Date & Time**

01/09/06 11:00AM

**Options****Expiration Date:**

None

**Priority:**

Standard

**Reply Requested:**

No

**Return Notification:**

None

**Concealed Subject:**

No

**Security:**

Standard