

Umetco Minerals Corporation



P.O. BOX 1029
GRAND JUNCTION, COLORADO 81502
☎ (970) 245-3700

January 24, 2012

Mr. Dominic Orlando, Senior Project Manager
Decommissioning and Uranium Licensing Directorate
Division of Waste Management and Environmental Protection
Office of Federal and State Materials and Environmental Management Programs
U.S. Nuclear Regulatory Commission
Mail Stop T-8F5
11545 Rockville Pike
Rockville, Maryland 20852

Reference: **Radioactive Materials License SUA-648: Docket No. 040-0299**
Subject: **Umetco License Material Request Dated December 8, 2011**

Dear Mr. Orlando:

Umetco Minerals Corporation's (Umetco) letter dated December 8, 2011 requested administrative changes to License Condition 35A and 35D to clarify issues identified during Nuclear Regulatory Commission's (NRC) inspection on September 20, 2011. Specifically, Umetco's December 8, 2011 letter requested:

- Revision to License Condition 35A to include revisions to Attachment M-1 of Appendix M – Ground Water Monitoring Plan of the Alternate Concentration Limits Application.
- Revision to License Condition 35D regarding Lower Limits of Detection.

As discussed during our January 17, 2012 conference call, Umetco would like to withdraw the license amendment request contained in Umetco's December 8, 2011 letter. Prior to requesting modifications to the groundwater monitoring plan, Umetco will perform a detailed evaluation of target levels for model validation constituents to ensure the ACL model predictions accurately represent current conditions. This evaluation will be submitted to the NRC for review along with applicable request to modify target values, if necessary.

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Umetco would like to continue with the request to amend License Condition 35D regarding Lower Limits of Detection (LLD), however, the proposed language has been modified as follows:

35. D. ~~The licensee shall use, at a minimum, the following lower limits of detection for water quality analysis in mg/l, unless otherwise noted: arsenic 0.01, beryllium 0.01, nickel 0.01, selenium 0.005, total dissolved solids 10, sulfate 1.0, chloride 1.0, iron 0.1, pH 0.1 (standard units), natural uranium 0.0015, combined radium 226 and 228 1.0 pCi/L, thorium 230 1.0 pCi/L, lead 210 1.0 pCi/L, and gross alpha 5.0 pCi/L. Laboratory reported lower limits of detection shall be in accordance with Regulatory Guide 4.14, Radiological Effluent and Environmental Monitoring at Uranium Mills, Revision 1, April 1980, Radiological Effluent and Environmental Monitoring at Uranium Mills, Revision 1 April 1980..~~

If you, or your staff, have any questions, please contact me at 970-256-8889 or by e-mail at gieckte@dow.com.

Regards,



Thomas E. Gieck
Remediation Leader

TEG/jfc

cc: Mark Moxley, WDEQ