



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV  
URANIUM RECOVERY FIELD OFFICE  
BOX 25325  
DENVER, COLORADO 80225

APR 12 1991

URFO:GRK  
SIS 6

MEMORANDUM FOR: Robert J. Doda, State Agreement Program Officer  
Region IV

FROM: Gary R. Konwinski, Project Manager  
Uranium Recovery Field Office, Region IV

SUBJECT: REVIEW NOTES OF COLORADO DEPARTMENT OF HEALTH, RADIATION  
CONTROL DIVISION, PROGRAM REVIEW, CONDUCTED APRIL 1 TO 6,  
AND APRIL 10, 1991

Attached for your use are my review notes from the program review conducted at the Colorado Department of Health, Radiation Control Division. I hope these are useful in preparing your report.

I feel that an adequate regulatory framework exists to implement appropriate ground-water programs at the Colorado sites. As the review indicates, draft letters have been prepared to inform the licensees of the need for ground-water programs in consideration of Part 18. An interim program review specific to ground water, during the fall of 1991, may be useful. Such a review would verify that the programs are considering necessary elements, as well as meeting regulatory objectives.

The site visits to the Cotter and Uravan sites were extremely helpful in understanding the degree of Part 18 compliance that currently exists. I would suggest that if the fall ground-water review can be scheduled, that site visits to the two heap leach sites also be conducted.

I look forward to once again participating in the State of Texas review or other States where my expertise is of value. Should you have any questions concerning my review and associated notes, please feel free to contact me.

*Gary R. Konwinski*  
Gary R. Konwinski  
Project Manager

Attachment:  
As stated

## TABLE OF CONTENTS

	<u>Page</u>
Materials Reviewed.....	1
Previous Review (April 4 to 6, 1989) Findings/Recommendations....	2
Rules and Regulations Pertaining to Radiation Control.....	3
Policy for Detection Monitoring Programs at Uranium, Thorium, and Related Mill Sites.....	4
Colorado Department of Health Draft Letters.....	5
Cotter Corporation, Canon City Mill, Site Visit.....	6
Uravan Mill Site Visit.....	7
Summary.....	8

1

Program review of Colorado Department of Health, Radiation Control Division, April 1 to 5, and April 10, 1991. Review included applicable ground-water protection programs, licensing issues, and policy guidance on file with the Radiation Control Division. Review performed by Gary Konwinski, Uranium Recovery Field Office, Denver, Colorado.

Materials Reviewed:

1. Policy for Detection Monitoring Programs at uranium, thorium, and related mill sites, dated March 25, 1991.
2. Part 18, Appendix A, criteria relating to the operation of mills and the disposition of radioactive tailings or wastes.
3. Colorado Department of Health draft letters to:
  - o Hecla Mining Company
  - o Cotter Corporation
  - o Umetco Minerals Corporation, Maybell
  - o Umetco Minerals Corporation, Uravan
4. Colorado Department of Health Interoffice Communication:
  - o Preliminary facility review of Umetco's Maybell site for Part 18, Ground-Water Monitoring Requirements.
  - o Implementation of Part 18, Ground-water Regulations at the Uravan site.
  - o Preliminary facility review of Cotter's Canon City site for Part 18, Ground-Water Monitoring Requirements.
5. Conceptual Reclamation Plan Durita Site, December 1990.
6. Site visit on April 3, 1991, to Cotter Corporation, Canon City Mill.
7. Site visit on April 10, 1991, to Umetco's Uravan Mill.
8. Guidance for Construction of Ground-Water Monitoring Wells by Water Quality Division, Ground Water Unit, July 1987.

Previous Review (April 4 to 6, 1989) Findings/Recommendations:

- ° Colorado Department of Health must be certain that appropriate hazardous constituents are monitored. They must meet the following:
  - The constituent is reasonably expected to be in or derived from the byproduct material.
  - The constituent is detected in the uppermost aquifer.
  - The constituent is in Criterion 13 list of hazardous constituents.
- ° For compliance with 40 CFR 192 or 10 CFR Appendix A or the Colorado Department of Health ground-water regulations to be appropriate, compliance points need to be established in the uppermost aquifer at the downgradient edge of the disposal area.
- ° For the NRC to concur on a closure plan, from a ground-water viewpoint, compliance with appropriate ground-water protection standards must be shown. These standards are one of the following: background, the drinking water standard as published in Appendix VIII (EPA), or an alternate concentration limit. Remediating the ground water for a predetermined number of years cannot be considered as a closure standard, regardless of commitments made in the consent decrees.
- ° The agricultural standards that have been agreed to as concentration limits which will allow termination of ground-water remediation may indeed represent appropriate limits; however, an alternate concentration limit proposal needs to be submitted by the licensee and reviewed by the Department, as outlined in the draft NRC guidance dated June 1988.
- ° At sites where leakage is suspected or known to exist, but indicator parameters are not elevated, the Department should establish ground-water protection standards for those hazardous constituents reasonably expected to be in or derived from the byproduct material and related processing. This may be the case at the Maybell site.

Although several specific findings/recommendations were made on the Cotter Corporation and Uravan Consent Decrees, the general program components are discussed in the comments noted above. Following the program review, a September 21, 1989, meeting was held in NRC, Region IV office that discussed State Program Review findings. Major points that were discussed included the need to close sites in consideration of ground-water standards, corrective action programs, and utilization of the ALARA concept. In addition, URFO offered technical assistance to the Health Department to aid in implementation of the regulations.

Rules and Regulations Pertaining to Radiation Control:

Part 18, Appendix A, criteria relating to the operation of mills and the disposition of radioactive tailings or wastes, represents the Colorado Department of Health, Radiation Control Division (CDH/RCD) conforming regulations relative to 10 CFR 40, Appendix A. Part 18, Appendix A, is dated December 30, 1990. It is basically a duplication of 10 CFR 40, Appendix A. Because the regulations are in effect, there now is a 18-month deadline to implement fully operational corrective action programs at those sites which have levels of hazardous constituents elevated above background at the points of compliance. This situation will certainly apply to the Uravan and Cotter sites. Sufficient information is not available to make a similar finding at the Maybell and Durita heap leach sites.

Part 18, Appendix A, was reviewed briefly relative to major program components detection and compliance monitoring programs, hazardous constituents, concentration limits, and so on. All criteria were in order. It was noted that the maximum concentration of 0.1 mg/l for Methoxychlor (1, 1, 1 - Trichloro - 2, 2 - bis, p-methoxyphenylethane) was deleted from Criterion 5C. This probably represents a compilation oversight. Because this hazardous constituent is not known to be present in or derived from tailings solutions, a revision is not an immediate need.

The remainder of Appendix A appears to have incorporated all relevant portions from 10 CFR 40, Appendix A. These regulations will supply sufficient guidance to the licensees to allow implementation of appropriate ground-water programs. Similarly, the regulations clearly give the State authority to implement ground-water management programs that are compatible with those in effect at NRC licensed facilities.



Policy for Detection Monitoring Programs at Uranium, Thorium, and Related Mill Sites:

The CDH/RCD has prepared a guidance document to aid licensees in preparing ground-water monitoring and corrective action programs at uranium, thorium, and related mill sites. The guidance in this paper discusses eight elements that are designed to aid the licensee in submitting an acceptable ground-water program.

Element 1 discusses hazardous constituents that the NRC has identified to be present in mill tailings impoundments as well as "basic constituents," representing common anions and cations that should be monitored. Additionally, more mobile hazardous constituents are discussed as indicator species. Appropriate discussions of detection monitoring and compliance monitoring programs are included.

More complete guidance could be supplied to the licensees if CDH/RCD noted the mobility of nickel and identified it as an indicator species. Similarly, the guidance may rely too much on hazardous constituent data collected by the NRC. The licensee should be directed to review process additives and ore composition. This would allow them to make a statement that the "other" 350 hazardous constituents, listed in Criterion 10, are not present in the byproduct material solution.

Elements 2, 3, and 4, discussing the point of compliance, background determination, and well construction, respectively, supply useful guidance to the licensees. A similar situation exists for elements 6 and 8, discussing sampling frequency and statistical significance, respectively. All eight of the elements demonstrate an adequate flexibility to resolve the issues. There could be more guidance given in elements 5 and 7, discussing lower limits of detection and ground-water flow reporting, respectively.

Lower limits of detection (LLD) that are 10 percent of the Criterion 5C values are adequate. This could be stated in the guidance. Similarly, a list of LLDs for constituents identified in element 1 would aid in establishing a credible program (see February 25, 1991, interoffice communication, Gregory Brand to Ken Weaver). The State has compiled LLDs that their laboratory can achieve. Appropriate sections of this information should be incorporated into the guidance documents.

The ground-water flow discussion noted in element 7 should be expanded to include seepage collection rates as well as the mass of hazardous constituents that have been recovered as a result of the corrective action program. This data will be necessary to demonstrate the amount of hazardous constituents that have been isolated, for the long-term, in the disposal area. This overall discussion will be needed to support an ALARA determination. Similarly, the NRC is implementing a "stability" monitoring period to verify corrective action program results. This concept should be forwarded to the licensees in the guidance document.

Colorado Department of Health Draft Letters

The CDH/RCD has prepared four draft letters which they are about to issue to the licensees that are required to implement ground-water programs under Part 18 of Rules and Regulations Pertaining to Radiation Control. Each of the letters is specific to the site and discusses criteria that is in need of attention in order to comply with Part 18. Each of the letters will include the "Policy for Detection Monitoring Programs at Uranium, Thorium, and Related Mill Sites."

Each of these letters is an abbreviated compilation of an interoffice preliminary facility review of the sites' ground-water programs. It appears that each site has been given an adequate review with the CDH/RCD utilizing a temporary employee in this capacity. Relevant issues are raised in each letter; however, other issues may need to be discussed.

The current issues that are discussed involve detection and compliance monitoring. Each letter, by design, does not discuss the need for corrective action or ALARA considerations. Adequate data exists to verify that hazardous constituents at the Cotter and Uravan sites have exceeded background concentrations of hazardous constituents. At these sites, it may be appropriate to inform the licensees that corrective action programs meeting the definition in Criterion 5D of Part 18, are needed within 18 months of the effective date of the regulations, which is December 1990. There is no ability to be flexible on the 18-month deadline. Due to this, the State should require the implementation of corrective action programs at the earliest possible date.

Cotter Corporation, Canon City Mill, Site Visit

The visit to the Cotter site indicated that as discussed in the Consent Decree, a ground-water remediation program was being implemented. The program involves recovery of ground water, partial treatment, and discharge to synthetically lined ponds in the area between the SCS dam and the old tailings site. This area, which has a series of remedial action components, recovers water at roughly 25 gallons per minute. This recovery meets the definition of a corrective action program, but needs to have its components described: background and point of compliance wells, rate and direction of ground-water flow, and define appropriate hazardous constituent concentrations, as well as implement a corrective action monitoring program.

The "dam to ditch" flush system could not be considered a corrective action program under Part 18, Criterion 5D. The dam to ditch system is designed to dilute the concentrations of molybdenum and uranium with the addition of clean water. Due to this, it does not remove or treat in place the hazardous constituents. For this system to be consistent with Part 18, some form of hazardous constituent treatment such as seepage collection is necessary. The seepage could then be returned to the lined evaporation ponds where the hazardous constituents would be concentrated by way of solution loss to the atmosphere.

Site closure must demonstrate that levels of hazardous constituents have been reduced to levels that are as low as reasonably achievable (ALARA). The mechanism and monitoring are minimally in place to demonstrate ALARA between the dam and the old tailings site. However, this is not the case in the dam to ditch flush system. Additional monitoring points as well as data on the amounts of hazardous constituents that are being recovered must be collected to verify the success or failure of the program.



Umetco Minerals Corporation, Uravan Mill Site Visit

The Umetco site has numerous remediation features that are required by the consent decree. During the site visit, five areas were reviewed to determine if the remedial actions at these areas meet the requirements of Appendix A to Part 18.

The ground-water remediation that is taking place at the Umetco site is removing hazardous constituents from the ground water. The recovered ground water and the constituents it contains are pumped to the Club Ranch pond numbers 7 and 8. These are synthetically-lined ponds which have been recently completed. They receive recovered ground water from the toe drains, mill area runoff, and hillside seepage.

Club Ranch ponds 1 through 6 are in the process of being constructed. These ponds will be utilized to evaporate recovered ground water from the river alluvium area. Currently, this water has a total dissolved solids concentration in excess of 200,000 ppm. The remedial action plan has defined the cleanup period to end when agricultural water standards are reached or if no change takes place in the ground water or pumping for a predetermined number of years. These termination criteria are not consistent with Part 18, and as such could not be utilized to support site closure.

The river ponds, Atkinson Creek crystal area, and the Burbank Pit were also visited. Both the river ponds and the Atkinson Creek crystal area have either had the byproduct materials removed or are in the process of having this done. Sufficient data on soil radium concentrations needs to be collected and documented to allow unrestricted release of these areas. Currently, such data is not available for these areas. Furthermore, the documented radium-226 soil concentrations in the river ponds as well as in the Club Ranch ponds area exceed Part 18 standards. These areas could not be released for unrestricted use without further byproduct material removal and verification that "5/15" standard has been achieved.

The Burbank Pit area as well as the byproduct material disposal areas, and former crystal areas need to have background and point of compliance wells established. Following this, hazardous constituent data needs to be gathered to support the establishment of ground-water protection standards. Existing consent decree agreements of pumping for a predetermined number of years or meeting agricultural standards are not compatible with Part 18 requirements.

Summary:

The CDH/RCD issued the Rules and Regulations Pertaining to Radiation Control as of December 30, 1990. These regulations, specifically Part 18, clearly give the State the authority to establish points of compliance, require corrective action programs, and implement various monitoring programs. In consideration of this, the following are recommendations:

- ° Issue the currently prepared draft letters, in final form, to the two conventional mills and two heap leaches requiring implementation of a detection and/or compliance monitoring programs.
- ° Inform Cotter Corporation and Umetco Minerals that a fully-operational corrective action program is required within 18 months of either December 30, 1990, the date of the regulations or the date of the final letter.
- ° It should be clearly stated that the court-ordered remedial action may or may not be acceptable as a Part 18 corrective action program.
- ° Inform each licensee that data collection on the mass of removed and isolated hazardous constituents is essential to defend an ALARA determination.
- ° Inform Umetco Minerals Corporation that byproduct material areas must be cleaned up to the Part 18 radium standard if they are to be released for unrestricted use.

Other CDH/RCD guidance in the form of "Policy for Detection Monitoring Programs at Uranium, Thorium, and Related Mill Sites" and "Guidance for Construction of Ground-Water Monitoring Wells" indicate the State's efforts to explain the program to the licensee as well as guide its implementation. There are several recommendations relative to this and related guidance:

- ° Lower limits of detection for all hazardous constituents likely to be found in tailings solutions should be included in the policy.
- ° A data collection technique discussing the mass and volume of recovered hazardous constituents should be stressed. This will aid future closure plans related to the ALARA concept.
- ° A similar document should be prepared that discusses corrective action program objectives.

Although CDH/RCD has adopted rules and implemented guidance, no detection or compliance monitoring programs that meet Part 18 requirements currently exist. Similarly, no approved corrective action programs exist. The draft letters that were reviewed indicate that the State is prepared to issue letters requiring the licensees to implement the appropriate programs. The licensee's responses must be critically reviewed to determine if they meet the intent of Part 18.

## APPENDIX F

April 1, 1991

URANIUM AND SPECIAL PROJECTS UNIT

<u>Short-Form Name</u>	<u>License</u>	<u>Long-Form Name</u>
Arvada WTP	ARV-00	Arvada North Table Mountain Plant
CNES Ra	770-01	Chem-Nuclear Radium Transfer Site
CDH GJ	000-03	CDH Grand Junction Inactive Site
CDH Gunnison	000-GN	CDH Gunnison Inactive Site
CDH Rifle	000-04	CDH Rifle Inactive Site
CSMRI	617-01	CO School of Mines
Cotter CC	369-01	Cotter Canon City Mill
Cotter WW	369-02	Cotter Whitewater Buying Station
Cotter SW	369-03	Cotter Schwaizwalder Ore Sorter
Cyprus Ra	565-01	Cyprus Radium Site
Cyprus Nat	319-02	Cyprus Naturita Inactive Site
Cyprus New	565-03	Cyprus Newmire Site
Den Ra OUs	000-RA	Denver Radium Site Residuals
DWD WTP	DEN-00	Denver Water Department Foothills Plant
Hecla Durango	317-03	Hecla Durango Inactive Site
Hecla Naturita	317-02	Hecla Naturita Site
Homestake Pitch	150-01	Homestake Pitch Radium Removal
Molycorp	500-03	Molycorp Louviers Rare Earth Plant
PSC D&D	32-DD	PSC FSV Decommissioning
PSC ISFSI	32-SF	PSC FSV Spent Fuel Storage
SM Quarry	SMQ-00	Sheep Mountain Quarry
Shumway GJ	293-01	Sand Extraction GJ Inactive Site
Sweeney	149-01	Sweeney Ore Sorter
Tusco	TUS-00	Tusco Boulder Inactive Site
Umetco Uravan	660-02	Umetco Uravan Mill
Umetco Maybell Heaps	660-01	Umetco Maybell Leach Heap Site
Umetco Maybell Old	660-05	Umetco Maybell Inactive Site
Umetco SR	660-04	Umetco Slick Rock Inactive Site
Umetco EBS	660-06	Umetco Uravan East Bench Site

FAA DATA SHEET  
03-31-91

License

Licensee: Cotter Corporation  
Site: Whitewater, Ore Sorter & Ore Buying Station  
License No: 369-02  
Expiration: June 30, 1991  
Status: Not-operating

DDR

Current \$ Amount: \$771,266.00  
Type: Bond, 085100014583 BCA, Aetna Casualty & Surety Company  
Established: September 8, 1978  
Original \$ Amount: \$250,000  
Renewal Date: Increased November 12, 1990  
Expiration Date: automatic renewal  
Location: State Treasurer's office  
RCD Review: 8/90 review requested increase to 771,266; rcd 11/12/90

LTC

Current \$ Amount: None required  
Original \$ Amount:  
Established:  
Current Renewal:  
Expiration Date:  
Location:  
RCD Review:



FAA DATA SHEET  
03-31-91

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License

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Licensee: Cotter Corporation  
Site: Schwartzwalder, Ore Sorter and Water Treatment Plant  
License No: 369-03  
Expiration: December 31, 1987; under renewal  
Status: Not-operating

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DDR

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Current \$ Amount: \$1,384,199  
Type: Performance Bond  
Established: Increased October 22, 1990; original in place December 7, 1982  
Original \$ Amount: \$663,879  
Renewal Date: --  
Expiration Date: --  
Location: State Treasury  
RCD Review: 8/90 review request increase to \$1,384,199; rcd 10/22/90

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LTC

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Current \$ Amount: None needed  
Original \$ Amount:  
Fund Type:  
Established:  
Current Renewal:  
Expiration Date:  
Location:  
RCD Review:

FAA DATA SHEET  
03-31-91

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License

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Licensee: Hecla Mining Company  
Site: Durita, Uranium heap leach  
License No: 317-02  
Expiration: 1980, under renewal  
Status: shutdown-awaiting reclamation

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DDR

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Current \$ Amount: \$120,454  
Type: 2 Performance Bonds, 81S100465141 and 2 BCA; Aetna Casualty  
& Surety  
Established: March 10, 1988  
Original \$ Amount: \$120,454  
Renewal Date: --  
Expiration Date: --  
Location: State Treasurer's office  
RCD Review: Bond currently inadequate, awaiting revision via renewal

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LTC

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Current \$ Amount: \$105,000  
Original \$ Amount: \$105,000  
Fund Type: 2 bonds: Duquesne Power and Light Company and El Paso  
Electric Company  
Established: 8/78  
Current Renewal: --  
Expiration Date: --  
Location: State Treasurer's Office  
RCD Review: Revision pending renewal; currently inadequate

FAA DATA SHEET  
03-31-91

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Licensee:	Homestake Mining Company
Site:	Sargents, Pitch Mine Radium Treatment Plant
License No:	150-01
Expiration:	June 30, 1994
Status:	Operating (Mine shut down)

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DDR

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Current \$ Amount:	\$249,809 (current reclamation estimate at \$155,000)
Type:	\$2,263,000 letter of credit held by MLRD and USFS, #122375 Bank of America
Established:	April 27, 1989 (revision)
Original \$ Amount:	\$249,809
Renewal Date:	Automatic renewal
Expiration Date:	none
Location:	State Treasurer's office
RCD Review:	August 22, 1990: acceptable, no change needed

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LTC

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Current \$ Amount:	None needed
Original \$ Amount:	
Fund:	
Established:	
Current Renewal:	
Expiration Date:	
Location:	
RCD Review:	

FAA DATA SHEET  
03-31-91

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Licensee

Licensee: Sweeney Mining and Milling Company  
Site: Marion millsite (thorium-bearing tailings)  
License No: 149-01  
Expiration: December 31, 1992  
Status: Interim stabilization

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DDR

Current \$ Amount: \$75  
Type: Cash Account  
Established: March 28, 1988  
Original \$ Amount: \$ to accrue to \$58,790  
Renewal Date: None  
Expiration Date: None  
Location: State Treasurer's office  
RCD Review: 1990

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LTC

Current \$ Amount: 0  
Original \$ Amount: To accrue to 19,000  
Type: cash  
Established: March 28, 1988  
Current Renewal: --  
Expiration Date: --  
Location: State Treasurer's  
RCD Review: 1990

NOTES: cash account to accumulate with precious metals processing

FAA DATA SHEET  
03-31-91

P. 07

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License

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Licensee: Umetco Minerals Corporation  
Site: Uravan Uranium Mill  
License No: 660-02  
Expiration: 12/31/91  
Status: In cleanup and reclamation

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DRF

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Current \$ Amount: \$12,488,900 (Bond) + \$17,323,541.61 (Construction Fund) =  
\$29,812,441.61  
Type: letter of credit, #50018743; Texas Commerce Bank + Court  
(RAP) ordered construction fund  
Established: April 6, 1989  
Original \$ Amount: \$23,692,000  
Renewal Date: April 10, 1990, revised annually for next year's work  
Expiration Date: Automatic renewal  
Location: State Treasurer's office  
RCD Review: OSC & AG via RAP, RCD staff

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LTC

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Current \$ Amount: \$494,000  
Original \$ Amount: --  
Fund Type: cash in construction fund  
Established: July 30, 1991  
Current Renewal: --  
Expiration Date: --  
Location: --  
RCD Review: --



FAA DATA SHEET  
03-31-91

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License

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Licensee: Umeco Minerals Corporation  
Site: Maybell, Uranium Heap Leach  
License No: 660-01  
Expiration: 1981, under timely renewal  
Status: Shut down; reclamation begun

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DDR

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Current \$ Amount: \$2,184,407  
Type: Letter of Credit, #1-006298, Texas Commerce Bank  
Established: 1975  
Original \$ Amount: \$1,360,000  
Renewal Date: May 31, 1992  
Expiration Date: Automatic renewal  
Location: State Treasurer's office  
RCD Review: Currently ongoing via license renewal, Inflationary upgrade to 2,184,407. rcd 10-31-90

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LTC

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Current \$ Amount: \$459,200  
Original \$ Amount: \$459,200  
Type: Letter of Credit, #1-006299; Texas Commerce Bank  
Established: Undated  
Current Renewal: May 31, 1992  
Expiration Date: May 31, 1992  
Location: State Treasurer's office  
RCD Review: In progress

FAA DATA SHEET  
03-31-91

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License

Licensee: Union 76 - Molycorp  
Site: Louviers, rare-earth Plant  
License No: 500-03  
Expiration: February 28, 1993  
Status: Operational

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## DDR

Current \$ Amount: \$628,000  
Type: Performance Bond, #U629405, with standby trust agreement  
Established: July 10, 1989  
Original \$ Amount: \$628,000  
Renewal Date: automatic  
Expiration Date: None  
Location: State Treasurer's office  
RCD Review: Molycorp 2/31/91 letter commits to revised cost estimate by  
03-31-91

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## LTC

Current \$ Amount: None required  
Original \$ Amount:  
Fund Type:  
Established:  
Current Renewal:  
Expiration Date:  
Location:  
RCD Review:

FAA DATA SHEET  
03-31-91

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License

Licensor:	Cotter Corporation
Site:	Canon City, Uranium Mill
License No:	369-01
Expiration:	August, 1984 - under timely renewal
Status:	Uranium-bearing water recycle operating only

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DDR

Current \$ Amount:	\$10,500,000
Type:	Performance Bond, OES 100052743 BCA; Aetna Casualty & Surety
Established:	October 2, 1984
Original \$ Amount:	\$10,000,000
Renewal Date:	automatic
Expiration Date:	--
Location:	State Treasurer's office
RCD Review:	Letter of February 15, 1991 suggests increase to \$16,843,855, until renewal agreement Note additional security of court and enforced RAP and independent surety for various cleanup activities

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LTC

Current \$ Amount:	\$220,000
Original \$ Amount:	\$278,000
Fund Type:	Cash (\$210,000); yellowcake (value estimated at \$10,000)
Established:	August 21, 1979
Current Renewal:	--
Expiration Date:	--
Location:	State Treasurer's office (cash); Canon City mill (YC)
RCD Review:	to be revised in renewal