

# PETROTOMICS COMPANY

GETTY OIL COMPANY • MANAGING PARTNER

P. O. BOX 2509 • SHIRLEY BASIN, WYOMING 82615

October 5, 1976

Fuel Processing & Fabrication Branch  
Division of Fuel Cycle & Material Safety  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attention: Mr. L. C. Rouse, Chief

Dear Mr. Rouse:

Petrotomics Company, Holder of Source Material License No. SUA-551, Docket No. 40-6659, herewith submits this Application for Amendment to that license in accordance with section 18 on page 2 of 2. We seek to modify the present tailings dam by increasing it's dimensions so that the present tailings impoundment capacity can be expanded to accommodate additional tailings and continue to maintain the integrity which the present retention system has demonstrated throughout the life of the Petrotomics operation - more than 14 years.

Details relative to the existing dam, the proposed modification and other pertinent data are submitted. These have been compiled by the engineering personnel of Getty Oil Company, Operator of Petrotomics Company. In your review and analysis of our proposal we suggest that you give particular consideration to the following:

1. By adding to the present structure and analyzing this entire proposed dam, we have: avoided the high cost of a complete design that would be necessary for a totally new dam; restricted the amount of consultant work to that necessary to supply detailed information as outlined in Regulatory Guide 1.70; avoided the environmental problems inherent in a completely new site and structure; and avoided structural problems which might be encountered in a new dam.
2. We have used outside engineering assistance and laboratory and field tests to insure the same standard of dam integrity for the addition as now exists at the present dam. We quote from the book "Design of Small Dams":

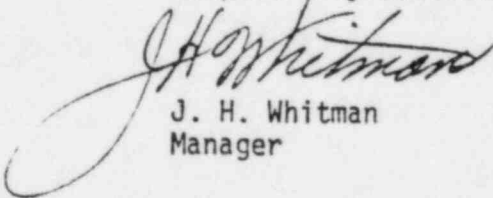
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".....for small dams, where the cost of explorations and laboratory testing of embankment materials for analytical studies together with the engineering comprise an inordinate proportion of the total cost of the structure, the practice of designing on the basis of successful structures and past experience becomes even more appropriate."

3. By utilizing our own engineering personnel and expertise the same organization will have the control and responsibility for not only the design and construction but also for the operation, maintenance and monitoring of the dam.
4. The new portion of the dam will be constructed of clay material selectively taken from the current open pit operation. Similar material was used to construct the present dam. Mill tailings have never been used as part of the dam construction at Petrotomics and will not be used for the proposed modification.
5. The present dam has demonstrated integrity for the past 14 years.
6. As has always been our practice, Petrotomics Company will comply with all Nuclear Regulatory Commission requirements and guidelines. The same will apply to this proposed modification.

Respectfully submitted,



J. H. Whitman  
Manager

JHW:ps

Enclosures

cc: N. R. C. - 8  
Mr. C. E. Wolff  
Mr. R. E. Killilay