



Bluewater Mill
Post Office Box 638
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Telephone 505 876 2211
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RETURN

40-8902

MAIL TO PDR, HQ.

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04008902620E

MAIL TO PDR, HQ.

November 20, 1992

Ramon Hall
United States Nuclear Regulatory Commission
Uranium Recovery Field Office
P. O. Box 25325
Denver, Colorado 80225

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Dear Mr. Hall:

The Atlantic Richfield Company (ARCO) is in receipt of your letter dated October 21, 1992 informing us that the NRC cannot at this time complete a review of our request for an Alternate Concentration Limit (ACL). We understand that the Commission has not yet approved ACL guidance documents, and that this situation will not reach an immediate resolution. We also understand that because of this situation, your office is requesting that we propose by November 30, 1992, a Corrective Action Program (CAP) pursuant to 10 CFR 40, Appendix A, to be incorporated into our license. This CAP will have as its objective removing hazardous constituents or treating them in place.

To comply with your request ARCO hereby transmits five copies of a supplemental CAP and also requests that NRC modify ARCO's license for the completion of groundwater corrective actions from the current date of December 1, 1992 to December 31, 1993.

The attached supplemental CAP is based on the corrective action assessment work in the previous ACL petitions (May 1989 and June 1990) and proposes the vertical band drain system (wicks) as the groundwater CAP. The corrective action assessment indicates that the wicks are the most effective choice to keep the Bluewater Mill groundwater concentration As Low As Reasonably Achievable (ALARA). The proposed corrective action will reduce the remaining groundwater contamination source by removing tailings liquids displaced during slime consolidation from the tailings pile.

Also, as discussed in your letter, the groundwater concentrations of hazardous constituents at the Point of Compliance wells exceed the standards established in our license, SUA-1470. Based on our June 1990 petition for an ACL it was our conclusion that these concentrations do not pose a present or potential hazard to human health or the environments. Data from the implementation and completion of the NRC approved CAP (August 1989) indicate that the groundwater concentrations at the Bluewater Mill are ALARA.

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C PDR

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Certified By *Mary C. Hood*

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United States Nuclear Regulatory Commission
November 20, 1992
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Should you have any questions regarding this submittal, please contact me or Natver Patel
of my staff.

Sincerely,

A handwritten signature in dark ink, appearing to be 'R. S. Ziegler', written over the printed name.

R. S. Ziegler

/cag

pc: C. F. George
S. Purdy
N. Patel