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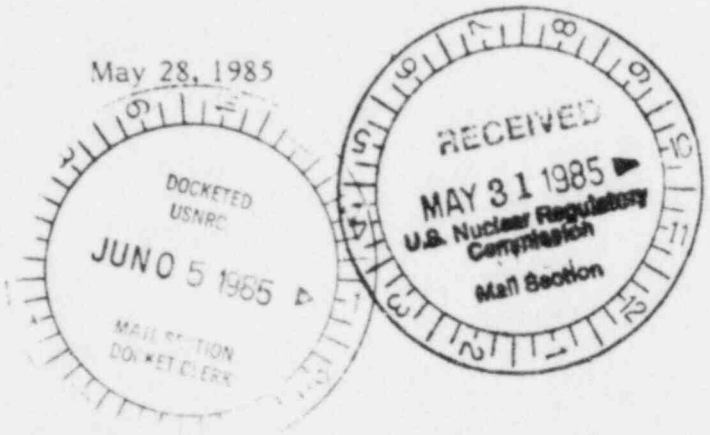
Wyoming Fuel Company RETURN ORIGINAL TO P.M. HQ.

12055 W. Second Place • P.O. Box 15596 • Lakewood, Colorado 80215 • Telephone (303) 989-5037

May 28, 1985



U.S. Nuclear Regulatory Commission
Region IV
Uranium Recovery Field Office
Box 25325
Denver, Colorado 80225
Attn: Mr. Edward F. Hawkins

Dear Mr. Hawkins:

The following additional information is provided in response to your letter of May 10, 1985 regarding Wyoming Fuel Company's submittal of April 2, 1985 which listed minor construction and design changes to the Crow Butte facility.

Question 1

Prior to adding additional wells to Wellfield No. 1 (wells in addition to the original five-spot with 66 foot well spacings and the two observation wells), WFC will submit the proposed location of leaching pattern and restoration plan for these additional wells to the NRC for review and approval.

RESPONSE

The initial 66 foot well pattern is planned to be the north five-spot of Wellfield No. 1. This five-spot is formed by PT-4, PT-1, PT-2, PT-6 and PT-7. These wells are shown on the revised Site Layout submitted on April 2, 1985. The observation wells would be PT-8 and PT-9. Prior to the installation of any additional wells in Wellfield No. 1 WFC will submit the proposed location and preliminary restoration plan for these additional wells.

Question 2

Section 3.1 - What provisions have been made for detecting leaks from the underground piping?

DESIGNATED ORIGINAL

Certified By Mary C. Hord

FEE EXEMPT

Add'l Info
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RESPONSE

No "leak detection system" has been planned for the underground piping. Prior to placing the piping in service it will be leak tested. As mentioned in the February 11, 1983 application, since the lines will be buried, they will not be subject to most causes of piping failures. During normal operation the operating personnel will routinely inspect the wellfields and have occasion to walk the piping routes. As a part of these inspections the operators will be instructed to look for wet or soft spots which may indicate leakage from pipes. Any major leak would be detected quickly as it would result in dramatic fluctuation in the tank levels in the plant. This would be an indication to the operator to check flow rates which would likely indicate a major leak.

Question 3

Section 3.2 - What other tanks will be vented (i.e., injection and recovery surge tank, pregnant eluant tank, etc)?

RESPONSE

The injection, recovery, R.O. feed and waste tanks will be vented to the outside by an induced draft system which will maintain a slightly negative pressure on the tanks. The precipitation tanks will be similarly vented by a separate system. The decarbonator will be vented using a forced draft system. All other tanks will either be uncovered or will be vented to the atmosphere inside the plant building.

Question 4

Section 3.3 - Instruments should be used to check pressure at each well. Header pressure does not tell you which well or wells are pressuring up. A pressure indicator on each well line or well head is a better plan. Likewise, each well should have a dedicated flow meter as indicated on Figure 3.1-10.

RESPONSE

Either flow and valve position or a pressure indicator can be used to determine if a well is pressuring up. As shown on the revised Figure 3.1-10 submitted April 2, 1985 each well (indicated by the "Typ." for typical next to the injection well instrumentation) will be equipped with a totallizing flow meter, a Kent or Badger meter for example, and a hand control valve. If the operator must open the valve more and more to achieve the desired flow into a well then obviously it is pressuring up. Header pressure gives an indication of the pressure available to all wells and the maximum pressure which can be put on any well.

Question 5

Section 5.7 - How many times per shift will an injection pressures be read? Once per 8 or 12 hours may not be adequate to control wells prone to overpressuring.

RESPONSE

The header pressure will be maintained at a level to ensure that no well can exceed the maximum authorized injection pressure of 100 psig. WFC will take flow and pressure readings at a minimum of once every 8 hours as required by the UIC permit issued by the NDEC. The flow rates to individual wells may be read more often depending on how the wells behave and consistent with good operating practice.

Question 6

Section 7.5 - Figure 3.1-10 indicates injection and production trunklines will be used. WFC's statement that individual buried lines will be used rather than trunklines is inconsistent with Figure 3.1-10.

RESPONSE

In the April 2, 1985 submittal the inconsistency between Section 7.5, trunklines, and the present plan to use individual buried lines was addressed. Figure 3.1-10 shows individual buried lines to each injection well and production well.

If you have any questions or require further information please contact me.

Sincerely,

Stephen P. Collings

Stephen P. Collings
Manager - Uranium Development

SPC/tl

cc: Ralph Knode