

MATERIALS LICENSE

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 40 and 70, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

Licensee

1. Plateau Resources Limited

3. License number

SUA-1371, Amendment No. 24

2. 772 Horizon Drive
Grand Junction, CO 81506-3989

4. Expiration date December 31, 1984

5. Docket or
Reference No. 40-86986. Byproduct, source, and/or
special nuclear material7. Chemical and/or physical
form8. Maximum amount that licensee
may possess at any one time
under this license

Natural Uranium

Any

Unlimited

9. The licensee is hereby authorized to possess byproduct material in the form of uranium waste tailings generated by the licensee's milling operations authorized under SUA-1371.
10. Authorized place of use: The licensee's uranium milling facilities located in Garfield County, Utah.
11. For use in accordance with statements, representations, and conditions contained in Sections 3.2, 3.3, 4.1, 4.2, 5 and 7 of the licensee's application dated May 5, 1978, as modified by revisions dated August 17 and September 6, 1979, June 16, 1980, and March 1, 1983, June 20, 1983, August 15, 1984, and in Subsection 2.1, Figure 2.1-3, Subsections 3.2 through 3.5, Figures 3.1-1, 3.2-1, G-12, Table 3.3-1, Subsection 6.2, Tables 6.2-1 and 6.2-2 and Section 7 of the licensee's Environmental Report dated May 1978 with supplements dated August and September 1978, June 16, 1980, March 22 and April 12, 1985. Whenever the words "will," "would" or "should" are used in the text listed above, they shall denote a requirement.
12. The maximum mill throughput shall not exceed 2,740 pounds of barrelled U_3O_8 per day, averaged over any calendar year.
13. The licensee is hereby exempted from the requirements of Section 20.203(e)(2) of 10 CFR 20 for areas within the mill, provided that all entrances to the mill are conspicuously posted in accordance with Section 20.203(e)(2) and with words, "Any area within this mill may contain radioactive material."
14. Any changes in the mill circuit or dust collection systems illustrated and described in Sections 3.0 and 4.0 of the licensee's application and revisions

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having the potential for increasing process emissions shall require approval by the NRC in the form of a license amendment.

15. Before engaging in any activity not assessed by the NRC, the licensee shall prepare and record an evaluation of the potential environmental impact of such activity. When the evaluation indicates that the proposed activity may result in a significant adverse environmental impact that was not assessed or that is greater than that assessed in the FES (NUREG-0583) dated July 1979, the licensee shall provide a written evaluation of such activities and obtain prior approval from the NRC for the activity.
16. The licensee shall immediately notify the NRC and the Office of State Historic Preservation Officer if artifacts are discovered during disturbance of the mill or the tailings disposal areas and shall have an archeological survey performed prior to disturbing any previously unsurveyed areas.
17. The licensee shall conduct and document an inspection of the tailings disposal system at least once per shift during normal operations and once per day during periods of extended nonoperation of 30 days or more. The licensee shall immediately notify Region IV, Uranium Recovery Field Office, U.S. Nuclear Regulatory Commission, P.O. Box 25325, Denver, CO 80225 by telephone and/or telegraph of any failure in the tailings embankment or tailings discharge system which results in the release of radioactive material. This requirement is in addition to the requirements of 10 CFR Part 20. In conjunction with the tailings system inspections, the licensee shall monitor and document the use of the tailings impoundment by wildlife.
18. The licensee shall minimize the dispersal of dust from tailings and stock-piled ore by water sprinkling or other dust suppression techniques unless a documented weekly inspection indicates that the moisture content of the ore and tailings and/or weather conditions are providing adequate control of dusting. This program shall include the use of written operating procedures that provide a description of specific control methods covering all conditions.
19. The licensee shall maintain the following management control program:
 - a. All routine operational activities including operations involving the handling, processing or storage of radioactive materials shall be conducted in accordance with written procedures reviewed and approved annually by the Environmental and Radiological Health Supervisor.
 - b. Written operating procedures shall likewise be followed for the radiation safety and the environmental monitoring and control programs. These procedures shall be reviewed and approved on an annual basis by the ERHS in writing.
 - c. Work or maintenance not covered by effective written operating procedures or any nonroutine maintenance or repair work where a potential radiological hazard exists shall be controlled by a work order system requiring the

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issuance of a radiation work permit signed by a member of the radiation safety staff.

20. As a part of the radiation safety and the environmental monitoring and control programs, the Environmental and Radiological Health Supervisor (ERHS) and/or his staff shall conduct reviews and inspections and prepare reports as follows:
- a. Work and storage areas and radiation work safety practices shall be inspected weekly. Documented reports of these inspections shall include process and engineering recommendations. During periods of extended nonoperations, lasting 30 days or more, the yellowcake storage and calcining area shall be inspected weekly and the results documented. All other areas shall be inspected monthly.
 - b. All monitoring and exposure data shall be reviewed monthly to ensure completeness, detection of abnormal conditions and adequacy of followup actions as well as to detect trends and/or deviations. A written report to the Vice President, General Manager and Director of Regulatory Affairs of this review shall be prepared monthly. During periods of nonoperation lasting 30 days or more a semiannual report shall be prepared.
 - c. The ERHS shall review and formally report semiannually to the Vice President, General Manager and Director of Regulatory Affairs any upward trends in monitoring or survey data, abnormal emissions, items of regulatory noncompliance, recommendations for necessary corrective actions and an evaluation of the adequacy of the implementation of license conditions.
 - d. The ERHS shall annually submit to the Vice President, General Manager and Director of Regulatory Affairs annually a formal report of all audits and inspections including conclusions and recommendations regarding the overall radiological health and safety, environmental control and "ALARA" programs. This report will present a review of employee exposures (including bioassay data), effluent release data, and environmental monitoring results as a means of demonstrating, (1) if there are any upward trends developing in personnel exposures for identifiable categories of workers, types of operations or effluent releases, (2) if exposures and effluents might be lowered under the ALARA concept, and (3) if the effluent and exposure control equipment is being used, maintained and inspected properly.
21. The Quality Assurance Consultant shall conduct a semiannual audit of operating procedures, exposure records, monthly inspection reports, training programs, and reports of safety meetings to evaluate the overall effectiveness of the program with adherence to the ALARA philosophy. Audit results shall be documented and sent to the Vice President, General Manager and the Director of Regulatory Affairs.
22. In addition to the training program described in Subsection 5.3 of the licensee's application, the following training shall be conducted:

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- a. Indoctrination training will be continued during the first month of employment after which all new employees will be required to pass a written test demonstrating adequate understanding of radiation safety procedures. The employee's understanding of the plant radiological safety program will be reassessed through annual written tests. Documentation will be maintained in the training files of all employee indoctrination and follow-up training and testing. If appropriate in consideration of the circumstances of the individual employee, these tests may be administered and taken orally, and may be administered and taken in a language other than English.
- b. Supervisors will receive additional training to qualify them for conducting specific job related training and for evaluating workers performance. Supervisor training will be documented in the same manner as indoctrination training.
- c. Radiological technicians will receive documented on-the-job training from the ERHS and other qualified persons with documented retraining provided every two years.
- d. The ERHS will receive refresher training every two years through recognized schools or courses of study.
23. Surface contamination surveys (both smear and total contamination) shall be conducted at least weekly at all eating areas, change rooms, control rooms, laboratories and office spaces. Both survey and decontamination procedures shall be conducted in accordance with Attachment No. 1 to SUA-1371, "Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use or Termination of Licenses for Byproduct or Source Materials," dated September, 1984. In addition, a documented daily visual surveillance shall be conducted of all mill areas to ascertain proper implementation of radiation safety practices including adequate cleanup to minimize surface buildup of radioactive particulates. These activities are to be conducted during periods of normal operations. The licensee shall, during extended periods of nonoperation lasting 30 days or more, conduct surface contamination surveys (both smear and total contamination) monthly in all eating areas, change rooms, control rooms and office. The surface contamination surveys will be conducted weekly in the analytical laboratory. In addition a documented weekly visual surveillance shall be conducted in all mill areas to ascertain proper implementation of radiation safety practice.
24. During normal mill operations the licensee shall determine the airborne particulate radioactivity levels monthly at the twenty-two locations listed in Table 6.2-2 of the licensee's environmental report that had been revised by the letter dated June 16, 1980. These general area samples shall be collected for a minimum of 60 minutes each and the sample filter analyzed for uranium. Analyses for Ra-226, Th-230 and Pb-210 shall be performed semiannually for a representative sample from each location. Samples shall be taken under conditions that are typical of employee exposure and the status operation of both process and effluent control equipment as well as ventilation conditions shall be recorded for each area during

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each sampling period. In addition, special area samples shall be taken during all nonroutine maintenance of yellowcake processing equipment.

Lapel samplers shall be used to confirm the general area sampling program results. These breathing zone samplers shall be worn for one full shift at least quarterly by mill personnel employed in the sample preparation and yellowcake processing areas as well as in all other processing areas and during all maintenance operations where airborne concentrations of uranium could exceed 25% of 10 CFR Part 20 permissible limits.

A time study shall be conducted and updated at least annually to determine the amount of time spent by employees in each job category in those areas covered by the in-plant airborne radiation monitoring program. This information, along with the general area and breathing zone airborne radiation concentration data, shall be used to calculate time weighted exposures. When nonroutine maintenance is performed, accurate time records shall be kept and, together with the results of special area or breathing zone samples taken over this period, shall be used to determine employee exposure.

During periods of extended nonoperation lasting 30 days or more, general airborne particulate radioactivity level shall be determined monthly at the five locations of highest activity in the mill and are to be reassessed quarterly. Lapel sampling will be conducted on workers whenever RWPs are issued, time records together with lapel sampling results shall be maintained, and used to determine employee exposures. Time studies are to be suspended during the period of extended nonoperation.

25. The licensee shall determine the concentration of radon-222 at all airborne particulate sampling stations at monthly intervals for the first six months of full-scale plant operation. After this, the number of sampling stations may be reduced to the five areas which indicate the highest concentrations during the six month period. Sampling of radon shall be conducted during normal ventilation conditions. These conditions shall be recorded for each sampling period. The modified Kusnetz method or other methods approved by the NRC shall be used for sampling and analysis.

During periods of extended nonoperation lasting 30 days or more, monthly samples shall be taken in the lunch rooms, change rooms, foreman's office and analytical laboratory. Samples shall be taken at specific work areas inside the plant buildings whenever maintenance work is performed.

26. A quarterly beta-gamma survey of the restricted plant area shall be performed to determine the level of external radiation present at the 25 representative locations listed in Table 6.2-1 of the licensee's environmental report.

During periods of extended nonoperation lasting 30 days or more, beta-gamma surveys shall be suspended except for quarterly surveys in the calcining and yellowcake storage areas.

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27. All sampling, analytical, survey, monitoring, and equipment calibration results as well as training records, reports of inspections and audits and subsequent reviews, investigations, and corrective actions will be clearly documented and the records retained for at least five years.
28. Radiation monitoring equipment shall be calibrated after repairs and at least semiannually or at the manufacturer's suggested interval, whichever is sooner, and checked for proper operation using a radiation source prior to use. Air sampling equipment shall be calibrated after repairs and at least quarterly or at the manufacturer's suggested interval, whichever is sooner, and flow rates checked prior to use.
29. The licensee shall perform hourly documented inspections of the effluent scrubber circuits in the yellowcake drying and packaging areas and shall read and record scrubber water flows and pressure drops at least once per shift only during drying and packaging operations.
30. Operations shall be suspended immediately in the affected areas of the mill if any of the emission control equipment for the crushing and feed areas or the yellowcake drying or packaging areas becomes inoperative.
31. All employees working in the yellowcake precipitation, drying, and packaging areas shall wear TLD or film badges with a sensitivity range of 1 to 1000 mrem during working hours. The badges will be exchanged on a quarterly basis and the exposed badges shall be delivered to a contractor for processing and readings. The licensee shall investigate the cause for all exposures exceeding 25% of the maximum permissible exposure listed in 10 CFR 20 and initiate prompt corrective action as required to reduce exposure levels to as low as reasonably achievable.
32. The licensee's respiratory protection program shall comply with Regulatory Guide 8.15, "Acceptable Programs for Respiratory Protection" and NUREG-0041, "Manual on Respiratory Protection Against Airborne Radioactive Materials."
33. The licensee shall conduct a bioassay program as described in Regulatory Guide 8.22. Baseline urine samples shall be taken and baseline in vivo measurements shall be made on all employees subject to be included in the bioassay program.

During periods of extended nonoperations lasting 30 days or more, in vivo counting shall be suspended, except for baselines on new hires and personnel who may be exposed to insoluble uranium.

34. The licensee shall conduct an effluent and environmental monitoring program as specified in Table 6.2 of the FES, NUREG-0583 dated July 1979. Notwithstanding the above, the license shall, during the period of mill shutdown, implement the environmental monitoring program specified in Table 5.1 of the licensee's submittal dated June 20, 1983 with the exception that ground and surface water samples shall also be analyzed for U-nat and Ra-226, but need not be analyzed for Po-210. Results of the monitoring programs shall be reported in accordance with

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10 CFR 40.65 and a copy of the report shall be sent to the Uranium Recovery Field Office, Region IV, U.S. Nuclear Regulatory Commission, P.O. Box 25325, Denver, CO 80225.

35. If unexpected harmful effects or evidence of irreversible damage not otherwise identified in NUREG-0538 dated July 1979 are detected during construction or operations, the licensee shall provide to the NRC an analysis of the problem and a plan of action to eliminate or significantly reduce the harmful effects or damage.
36. Mill tailings other than samples for research shall not be transferred from the site without specific prior approval of the NRC obtained through application for amendment of this license. The licensee shall maintain a permanent record of all transfers made under the provisions of this condition.
37. The licensee shall conduct an annual survey of land use (grazing, residences, wells, etc.) in the area within five miles of the mill and submit a report of this survey annually to the Uranium Recovery Field Office, USNRC, P.O. Box 25325, Denver, CO 80225. The report shall indicate any differences in land use from that described in the licensee's Environmental Report and supplements or the previous annual report. The first annual report shall be submitted by October 1, 1980, and by October 1 each year thereafter.
38. The licensee shall provide for stabilization and reclamation of the mill site and tailings disposal areas and mill decommissioning as described in the "Decommissioning and Reclamation Plan" dated January 7, 1982 and revised March 17, 1982, April 11, 1983, April 12, 1983, and June 20, 1983; in Section 9.0 of the Environmental Report dated May 1978 with supplement dated June 16, 1980; and in Sections 3.3 and 10.3.2 Alternative 1 of the FES (NUREG-0583) dated July 1979, subject to revisions based upon implementation of the "Uranium Mill Licensing Requirements." Decontamination procedures for facilities or equipment will conform to the requirements in "Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use or Termination of Licenses for Byproduct or Source Materials," dated September, 1984. Radioactivity contamination limits governing the removal and disposal of contaminated soil shall conform to standards in the "Final Generic Environmental Impact Statement on Uranium Milling," NUREG-0706, Volume III, Appendix J, dated September 1980.
39. The licensee shall maintain a USNRC approved surety arrangement adequate to cover tailings stabilization and reclamation, mill decommissioning and mill site reclamation. The licensee shall submit for USNRC review and approval a proposed revision to the surety arrangement within six (6) months of USNRC approval of a revised reclamation plan. The revised surety shall be in effect within three (3) months of written USNRC approval. Furthermore, the licensee shall submit for USNRC review any proposed revision or annual update to the surety arrangement at least two (2) months prior to the proposed effective date. Along with each proposed revision or annual update the licensee shall submit supporting documentation showing a breakdown of the costs and the cost basis for tailings stabilization and reclamation, mill decommissioning and millsite reclamation.

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The licensee shall not deposit tailings in cells other than Cells 1, 2 and 3 unless authorized by amendment to this license.

40. The licensee shall construct a tailings disposal facility that will meet the safety criteria specified in Regulatory guide 3.11 and will incorporate the features described in Alternative 1 of Section 10.3.2 and in Subsection 3.2.4.7 of NUREG-0583 dated July 1979, subject to revisions based on the conclusions of the Final Generic Environmental Impact Statement on Uranium Milling and any related rulemaking.

Construction, maintenance and operation of the tailings retention system shall be in accordance with the specifications, representations, and commitments contained in the following documents.

- a. "Tailings Management Plan and Geotechnical Engineering Studies, Shooting Canyon Uranium Project," Woodward-Clyde Consultants, September 1978.
- b. Letter from M.B. Bennedson, Senior Project Engineer, Woodward-Clyde Consultants to Mr. Ross A. Scarano, NRC, January 19, 1979.
- c. "Stage I - Tailings Impoundment and Dam Final Design Report, Shooting Canyon Uranium Project," Woodward-Clyde Consultants May 24, 1979, including contract drawings and supplemental data dated June 12, 1979.
- d. Report, "Groundwater Monitoring Wells - Shooting Canyon Uranium Project" enclosed with letter from R.B. Sewell to Pete Garcia dated June 6, 1979.

The tailings dam shall be raised to the crest elevation of 4433 feet prior to starting the discharge of tailings into the impoundment. The licensee shall not expand the tailings impoundment area by raising the height of the dam beyond that specified in document (c) above, or by constructing any additional dams not specified in the documents listed above without specific prior approval of the NRC obtained through application for amendment of this license.

The licensee shall not be required to neutralize tailings materials other than as necessary to maximize recycle of tailings solutions through the mill, after such solutions have been physically separated from deposited tailings solids by draining, surface decanting, or other means. All tailings solutions physically separated from deposited tailings solids, other than those used for interim tailings stabilization, shall be recycled to the mill for reuse.

41. The licensee shall comply with the following regarding construction, maintenance, and operation of the tailings retention system:
- a. He shall notify the Uranium Recovery Field Office, USNRC, P.O. Box 25325, Denver, CO 80225 at least six weeks prior to construction of the following features to provide adequate time for on-site inspections by NRC personnel.

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1. When foundation preparation is near completion but prior to placement of backfill in the trench or over excavated surfaces.
 2. At approximately 10 percent completion of embankment fill placement.
 3. At approximately 75 percent completion of embankment fill placement.
- b. He shall submit a detailed embankment instrumentation program for NRC review approval at least three months prior to placing tailings effluent against the Stage I embankment or starting construction of the Stage II embankment.
- c. A minimum of 13 feet of free board shall be maintained between the top of the dam and the pond level during operation of the Stage I impoundment to provide required design flood protection.
42. During construction of the embankment, the licensee shall control the field density of embankment Zones 1 and 3 in accordance with ASTM D-1556 or ASTM D-2167 or by approved nuclear devices in accordance with ASTM D-2922 and D-3017. One field density test shall be performed for each 2000 cubic yards or less for each layer of fill placement. Moisture density tests (ASTM D-698 or D-2049), Atterberg Limits tests (for Zone 1), and gradation tests shall be performed at the frequency of one test for each 30,000 cubic yards of fill placement. Field density tests in Zone 2 shall be performed at the frequency of one test for each 50,000 cubic yards of fill placed. All fill placed in Zone 1 shall have a moisture content ranging from the optimum to 3 percent above the optimum and fill placed in Zone 3 shall have a moisture content ranging from 1 percent below to 1 percent above the optimum. The results of all quality control tests shall be submitted to the Uranium Recovery Field Office, USNRC, P.O. Box 25325, Denver, CO 80225 within six months of construction completion.
43. The licensee shall submit to the Uranium Recovery Field Office, USNRC, P.O. Box 25325, Denver, CO 80225, a report documenting the embankment foundation conditions within six months of completing the foundation preparation. This report shall include but not be limited to the following:
- a. Plan views of the foundation areas showing material types, locations of any anomalies or potential seepage paths, and the extent of slush grouting.
 - b. Photographs taken during foundation preparation.
 - c. A description of procedures used to proof test the foundation soil.
44. For a period of four (4) calendar quarters from the time that the Environmental Monitoring Program becomes operational at which time normal processing operations are resumed as required by License Condition 34, the sampling and analysis results of the Environmental Monitoring Program shall be reported to the Uranium Recovery Field Office, USNRC, P.O. Box 25325, Denver, CO 80225 within 60 days of the end of each calendar quarter in accordance with the format in Attachment

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No. 2 to SUA-1371, "Sample Format for Reporting Monitoring Data". Dose evaluations based on this actual environmental monitoring program data and the dose conversion factors as given in Attachment A of "Compliance Determination Procedures for Environmental Radiation Protection Standards for Uranium Recovery Facilities - 40 CFR 190" shall be included in the report.

45. The requirement in 10 CFR 20.405(c), when effective, for notification of levels of radiation or releases of radioactive materials in excess of the limits specified in 40 CFR 190 shall be suspended during the period that the four quarterly environmental monitoring reports are being submitted as required in License Condition 44 above.
46. The licensee shall submit for NRC review and approval by license amendment prior to construction, detailed plans showing the clay liner limits, levee and berm locations, and underdrain system for the Stage II tailings disposal area.
47. The licensee shall follow the lower limits of detection (LLD) contained in the Attachment No. 3 to SUA-1371, "Lower Limits of Detection (LLD) for Sample Analysis" except for the LLD's for Th-230 and Ra-226 in water for which the value 5×10^{-10} uCi/ml shall be followed in accordance with Section 2 of the licensee's submittal dated June 1983 for the analysis of samples collected pursuant to the Environmental Monitoring Program of License Condition 34. If the licensee wishes to use other LLDs, such LLDs shall be submitted to the Uranium Recovery Field Office, Region IV, U.S. Nuclear Regulatory Commission, P.O. Box 25325, Denver, CO 80225 for NRC review and approval prior to implementation.
48. a. The licensee shall not dispose of materials other than uranium mill tailings, spent resins, or raffinate in the tailings disposal area without the specific authorization of the Uranium Recovery Field Office, USNRC. The licensee shall submit to the Uranium Recovery Field Office, USNRC, for review and approval in the form of a license amendment a detailed analysis prior to disposing of any wastes in the tailings pond other than those authorized by this condition.
- b. The licensee is authorized to dispose of, in the existing Shootaring Canyon Mill Tailings Impoundment, contaminated solid wastes generated during the decommissioning of EFN's Hanksville Ore Buying Station and contaminated concrete and asphalt wastes resulting from the decommissioning of the Plateau Resources Limited, Blanding, Utah Ore Buying Station as specified in the submittal dated November 14, 1984. In addition, the licensee shall complete the waste disposal by June 30, 1985 and shall complete the interim stabilization of these wastes by placement of a minimum one foot thickness of locally obtained soil and rock rubble over these wastes by August 31, 1985.
49. The licensee shall implement the corrective actions committed to in their submittal dated January 29, 1985 in order to prevent a future overflow of the tailings sump.

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50. The licensee shall implement a ground water detection monitoring program to ensure compliance to 40 CFR 192.32(a)(2) which includes the following elements:
- a. The licensee shall monitor at the point of compliance and background wells for the following indicator parameters: Arsenic, Selenium and pH. The licensee shall utilize analytical techniques capable of providing lower limits of detection of 0.005 mg/l and 0.001 mg/l for arsenic and selenium, respectively. Measurements of pH shall be reported to the nearest 1/10 standard unit.
 - b. The determination of compliance shall be based upon sampling Wells RM-4, RM-5 and RM-6.
 - c. The determination of background levels for the parameters specified in subsection (a) shall be defined by sampling Well RM-1.
 - d. The licensee shall sample for those parameters specified in subsection (a) at those wells designated in subsections (b) and (c) three times a quarter for a period of one (1) year and at least twice annually thereafter. The first monthly sample shall be taken within 30 days of the date of this Order. All semiannual samples shall be taken at least four months apart.
 - e. The licensee shall, within 60 days of collection of the last of the twelve samples, propose for USNRC approval in the form of a license amendment background levels for indicator parameters and a statistical procedure for identifying significant changes (95% confidence level) between data from the wells specified in subsections (b) and (c).
 - f. The licensee shall report the data required by section (d) semiannually along with those data required by License Condition No. 44 in accordance to the reporting format, Attachment No. 4 to SUA-1371, "Sample Format for Reporting Detection Monitoring Data." These monitoring requirements are in addition to the requirements specified in License Condition No. 34.
 - g. The licensee shall report at least annually in accordance to reporting requirements specified in subsection (f) the rate and direction of ground water flow under the tailings impoundment.

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

Date JUL 19 1985

BY

/s/
R. Dale Smith, Director
Uranium Recovery Field Office
Region IV, Denver, CO

OFC :	URFO :	URFO :	RIV :	ELD :			
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