

40-8989

October ⁴/₃, 1996

Chief, Uranium Recovery Branch
 Division of Waste Management
 Office of Nuclear Materials Safety and Safeguards
 US Nuclear Regulatory Commission
 Washington, DC

Re: Radioactive Materials License SMC-1559

Dear Mr. Lefevre:

This faxed letter is in lieu of a verbal telephone notification of exceedences in several ground water wells at our Clive, UT disposal facility. Prior to collection of second quarter 1996 ground water samples Envirocare changed analytical laboratories for inorganic and organic parameters. The second quarter laboratory report indicated that a number of wells exceeded the established background for arsenic, cyanide, selenium, mercury and lead. Many of the results were reported as above the detection limit, but below the limit of quantitation. After an extensive review of laboratory QA data a decision was made to reanalyze the samples; however, the samples had exceeded the holding time. Therefore a second set of samples was collected from most of the wells on August 8 for cyanide analysis and on August 13 for analysis of arsenic, selenium and lead. Subsequently, the third quarter samples were collected on August 14 and 15.

Analytical results and comparison to license table S-1 are shown below.

WELL	PARAMETER	2ND QUARTER	AUGUST 8 AUGUST 13	3RD QUARTER	TABLE S-1
19A	ARSENIC	0.044		0.047	0.036
24	ARSENIC	0.033		0,034	0.032
	SELENIUM	0.032	0.033		0.008
25	ARSENIC	0.117	0.080	0.117	0.110
	CYANIDE	0.056		ND	0.056
26	ARSENIC	0.234	0.215		0.020
	LEAD	0.017	ND	ND	0.005
	MERCURY	0.0006		0.0014	0.0002

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27	ARSENIC	0.110	0.071		0.059
28	CYANIDE	0.012	ND	0.003	0.005
29	ARSENIC	0.028		0.029	0.023
57	ARSENIC	0.046		0.047	0.028
	CYANIDE	2.720	0.002	ND	0.005
58	ARSENIC	0.135	0.129		0.120
60	ARSENIC	0.035		0.034	0.028
	SELENIUM	0.025	0.033		0.015
63	ARSENIC	0.036		0.039	0.034

At this time we are considering that if either the August 8/August 13 samples or the third quarter samples confirmed the original value the result is an exceedence. If both the August 8/August 13 sample results were below the background value the well will be resampled on Monday, October 6.

Samples collected on October 6 will be split between the original laboratory and the current laboratory. In addition, fourth quarter samples will be collected later in the week of October 6. Samples collected for inorganic analysis will be split between the two laboratories in an effort to determine if the observed results are due to a real increase in concentrations of the parameters or to differences between the laboratories.

Envirocare will submit a report and plan according to license conditions 11.1.g and 12.2.

Vernon E. Gunders
Envirocare of Utah