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Warren N. Warhol
Vice President Manufacturing

May 28, 1985

Mr. John D. Kinneman, Chief
Nuclear Materials Safety
Section A
U.S. Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, Pennsylvania 19406

Waste Management Practices
License No. SMB-1408

40-08794

Dear Mr. Kinneman:

Outlined below is a response to your letter to me dated April 1, 1985. We share your concern about the growing volume of waste collecting at the York Plant, but we have made little progress in arranging for its final disposition. Progress has been difficult partly because various branches and agencies of government are unable to agree on disposal policies. Wyoming regulatory policy has been the major obstacle in permitting the most workable alternative available (Item 1a, below).

1. FINAL WASTE DISPOSAL

a. Disposal in the Tailings Cell at the Union Oil Co. Sweetwater Uranium Mine, Wyoming.

We have asked the NRC office in Denver to reconsider their opinion that this disposal would be disallowed by a compact between Wyoming and Colorado. Their final opinion is still pending, and if favorable, approval of Wyoming agencies will still need to be obtained.

Unfortunately, Wyoming is expected to be difficult to convince of the advantages of this alternative:

- The volume of material from York is small relative to the volume of material already existing in the tailings cell.
- The disposal would not involve a change in ownership of or responsibility for the material.

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Recognizing that both the Sweetwater and York materials will always exist, the proposal would seem to cause the least environmental and legal impact. We hope the NRC will provide leadership in advancing this constructive outcome.

b. Segregation of Waste Material Containing Less Than 0.05% Thorium-Uranium.

In the process of redrumming wastes on site, significant volumes of the material designated on Enclosure 1 as "waste treatment residues" may be found to contain less than 0.05% Th-U and can be sent to chemical waste disposal sites.

c. Processing of Materials into Saleable Products.

(1) The material designated on Enclosure 1 as "cerium fluoride residue" is currently being marketed in volumes that comply with applicable regulations. We are continually working to expand these markets and we are working on processes to create new products from this material, but significant relief of the storage situation by these means is likely to be years away.

(2) Blending of the rare-earth values contained in the "lanthanide chloride residues" in order to produce a currently marketable product has been proceeding under an amendment to License No. SMB-1408. However, relief from storage requirements by this means is not likely to be significant.

2. CURRENT INVENTORY OF WASTE

Enclosure 1 details the volumes of various source materials stored in 55-gallon drums. The locations of the storage areas are shown on Enclosure 2. The volume of source material buried in Area "L" has been estimated to be 900 cubic yards.

3. FUTURE EXPECTED WASTE GENERATION

Future generation depends on highly variable production and waste treatment requirements. The current rate of accumulation is between 2,500 and 3,000 55-gallon drums per year.

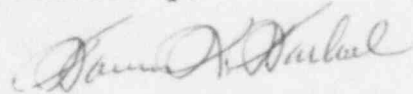
4. STABILITY OF WASTE PILE

Observation shows that source material in the wastepile under soil cover is not being eroded by either wind or water. Surface drainage from this area does not run off the site. Any erosion that appeared could be easily eliminated by planting a thick cover of vegetation.

5. PROCEDURES TO ASSURE INTEGRITY OF 55-GALLON DRUMS
The ultimate assurance of drum integrity is to re-package material in those drums that are in unsatisfactory condition, and this practice is ongoing. Deterioration of the new drums is being slowed with the use of a thicker polyethylene barrel liner than was used when long term storage was not anticipated.

I hope the foregoing responds satisfactorily to your letter. If you have further questions, please contact me or Mr. W. E. Doyle, general manager of the York Plant.

Sincerely,



WNW:jb

Attachment

cc: W. E. Doyle - w/attach.
T. B. Sleeman - "
E. N. Thede - "

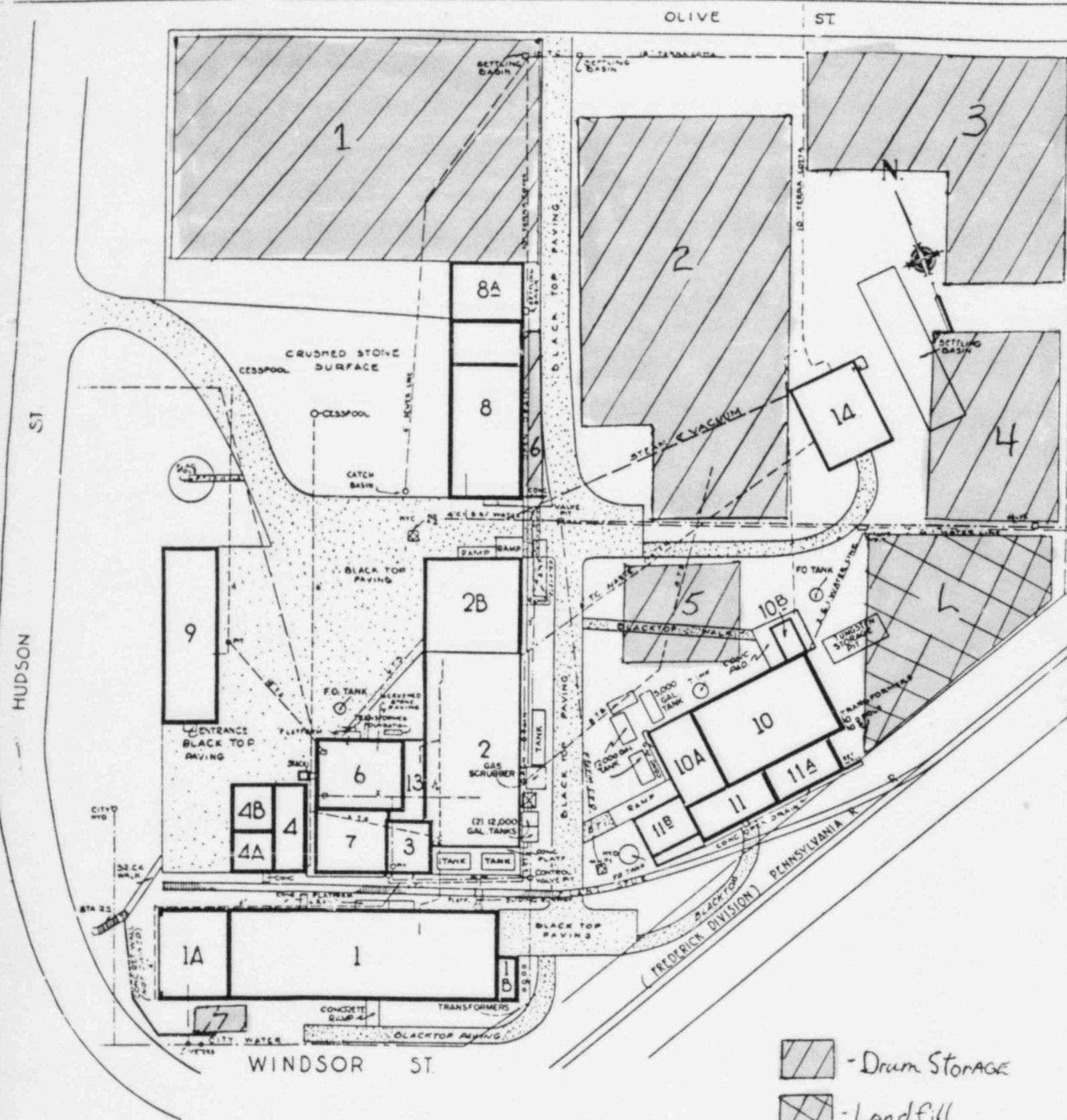
DRUM STORAGE INVENTORY

	Drums	Totals
Storage Area 1		
Cerium Fluoride Residue:	4070	4650
Waste Treatment Residue:	580	
Storage Area 2		
Cerium Fluoride Residue:	2292	4220
Lanthanide Chloride Residue:	328	
Waste Treatment Residue:	1160	
Cerium Hydrate Residue:	40	
Yttrium Residue:	400	
Storage Area 3		
Lanthanide Chloride Residue:	1480	2168
Waste Treatment Residue:	336	
Cerium Hydrate Residue:	352	
Storage Area 4		
Waste Treatment Residue:	880	880
Storage Area 5		
Lanthanide Chloride Residue:	908	908
Storage Area 6		
Waste Treatment Residue:	236	236
Storage Area 7		
Lead Residue:	68	68

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RESIDUE TOTALS

Cerium Fluoride Residue:	6362
Waste Treatment Residue:	3192
Lanthanide Chloride Residue:	2716
Cerium Hydrate Residue:	392
Yttrium Residue:	400
Lead Residue:	68



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