

**ENVIROCARE** OF UTAH, INC.  
THE SAFE ALTERNATIVE

November 20, 1996

Mr. Joseph J. Holonich  
Chief, Uranium Recovery Branch  
Division of Water Management  
Office of Nuclear Material Safety and Safeguards  
Washington, D.C. 20555

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Re: Schedule of Compliance Monitoring Activities and Response Concerning Site-Specific Standards  
License No. SMC-1559

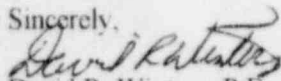
Dear Mr. Holonich:

It was identified during the November 19, 1996 site meeting with your Mr. Letif Hamdan and Mr. Bob Evans and Envirocare staff that site specific standards were required for wells with exceedences in accordance with section 11.1 g of the Materials License. As reported to you in the Envirocare Compliance Monitoring Plan dated October 24, 1996, exceedences have been noted for several parameters in numerous 11c(2) monitoring wells. It was, and remains Envirocare's position, that background exceedences in these wells are a result of statistical variation and/or interference discrepancies (likely due to high natural salinities in the groundwater) experienced in the laboratory analytical procedures. This may have been compounded due to Envirocare's contracting with a new certified laboratory in May 1996. Given the fact that the bulk of the exceedences were for Arsenic, an element not found in any 11c(2) waste streams received by Envirocare to date, several exceedences were in wells located 1/2 mile upgradient of placed waste, and due to the complexity and variability of naturally-occurring dissolved groundwater constituents, Envirocare is confident that these values are background levels and not associated with site operations in any way.

Therefore, in accordance with the license requirements and the previously submitted Compliance Monitoring Plan, Envirocare will continue to monitor and report analytical data based on the current stipulations of said license agreement and the values in table S-1. We consider these values to be our site specific values. Splits will be taken and analyzed for the fourth quarter 1996 sampling event (conducted November 18-21), the 1st quarter 1997 sampling event, as well as all subsequent resampling events as needed. Our findings and review of this data will be submitted to your office by April 30, 1997. In addition, Envirocare will further review the site hydrogeology, analytical trends, previous groundwater transport models and pertinent 11c(2) hydrological data and submit our findings and conclusions to the NRC by March 1, 1997.

Attached for your review is a draft copy of the 2nd quarter groundwater monitoring report which includes each associated resampling event. Should you have any questions, please feel free to give me a call at (801) 532-0920.

Sincerely,

  
David R. Winters, P.E.

Director of Groundwater Affairs

cc: Mr. Letif Hamdan-NRC  
Mr. Bob Evans-NRC  
Mr. Harold Lefevre-NRC  
Mr. Loren Morton-UDRC

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PDR ADOCK 04008989  
B PDR

46 WEST BROADWAY • SUITE 240 • SALT LAKE CITY, UTAH 84101 • TELEPHONE (801) 532-1330