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OGLE PETROLEUM INC. OF CALIFORNIA

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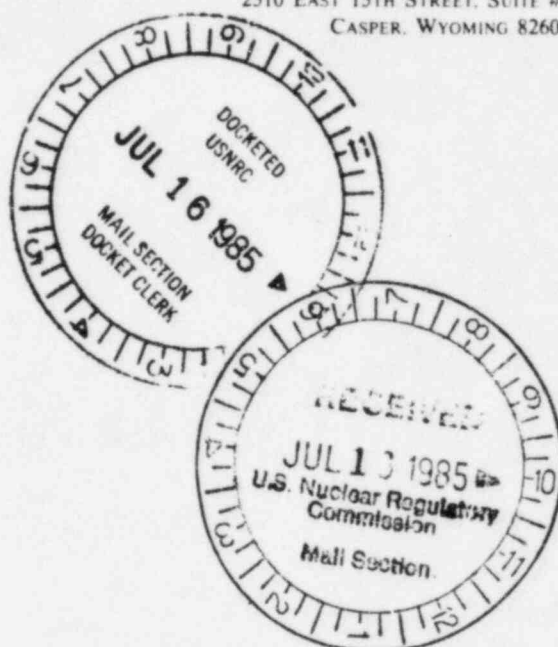
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July 12, 1985

RETURN ORIGINAL TO PDR. HQ.
2510 EAST 15TH STREET, SUITE #8
CASPER, WYOMING 82609

Mr. Rick Engelmann
District II Engineer
Land Quality Division
210 Lincoln Street
Lander, WY 82520

✓ Mr. George C. Pangburn
Senior Project Manager
U.S. Nuclear Regulatory Commission
P.O. Box 25325
Denver, CO 80225



Applicant.....	
Check No.. 1947...	
Amount/Fee Category...	ND-2B
Type of Fee...	Am.D
Date Check Rec'd...	7/16/85
Received By...	W. H. H. H.

RE: Bison Basin Mine -
LQD Permit to Mine
No. 504; NRC Source
Material License No.
SUA-1396, Docket No.
40-8745

Subject: Reduction in Monitoring and Staffing Requirements

Gentlemen:

Ogle Petroleum Inc. of California (OPIC) herewith requests reductions in monitoring and staffing requirements for the Bison Basin in-situ leach uranium solution mine located in southern Fremont County, Wyoming. It is felt that the specific requested reductions discussed in the following paragraphs are consistent with the current level of activity at the facility. In making these recommendations the staff has carefully considered the potential impacts on the environment, and the public health and safety. A tabulation of present radiation, and environmental monitoring requirements is attached to this letter for your convenience. The table also includes the recommended reductions in monitoring.

Radiation (in-plant)

The current in-plant radiation monitoring program includes daily and weekly inspections, RSO's monthly report, alara audits, surveys of various rooms, in-plant airborne radiation monitoring and a bioassay program. It is requested that all of the above radiation related requirements be suspended under the current level of activity at the mine except that an in-plant airborne radiation survey be performed twice a year and reported annually.

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Once total decontamination of the plant has been completed and verified by the NRC it is requested that the in-plant airborne radiation survey be totally eliminated. OPIC proposes that the semi-annual ALARA report requirement be eliminated.

The in-plant airborne radiation monitoring program at the Bison Basin mine presently consists of the following:

- 1) monthly radon gas sampling and analyses (13 locations)
- 2) monthly airborne radionuclide particulate sampling and analyses (3 locations)
- 3) weekly spot check for alpha emitter contamination (4 locations)
- 4) monthly swipes for alpha contamination (8 locations)
- 5) quarterly surveys for gamma/beta emissions (9 locations)

As part of this request for reduction in radiation monitoring requirements and consistent with Mr. Hawkins letter of January 29, 1985, OPIC requests that the frequency for recalibration of radiation monitoring equipment be changed from semi-annual to annual. Reduction in staffing and training requirements relative to the radiation monitoring program are covered in a later section of this letter.

Environmental

There are numerous environmental sampling requirements for the Bison Basin mine designed to cover an operating commercial in-situ solution mining facility. Tabulation of these requirements is attached to this letter.

Activity at the mine contemplated while on "waterim stabilization" or standby status will consist of periodic pumping of the mining unit No. 1 wellfield (except winter time) and discharging the solution to the evaporation ponds. This activity will keep the bottom of the ponds covered with water and maintain an inward hydraulic gradient in the mining unit No. 1 production zone aquifer. To provide environmental surveillance for this significant reduction in activity OPIC proposes to eliminate all of the environmental monitoring requirements shown on the attached table with the exception of sampling and analyses of

mining unit No. 1 excursion monitor wells, and periodic checking of the evaporation ponds.

Specifically, OPIC proposes to sample the mining unit No. 1 excursion monitor wells on a quarterly basis and analyze the samples for only three of the present six parameters. The three proposed parameters are specific conductivity, chloride, and total carbonate plus bicarbonate. The other three parameters we presently analyze for are uranium, sodium and sulfate.

In reference to the three evaporation ponds OPIC proposes to sample all the evaporation pond monitor wells on a quarterly basis (which is also the present LQD requirement) and to check the leak detection inspection tubes on a weekly basis (instead of daily). During the winter months when the water in the ponds is frozen solid OPIC proposes to suspend the weekly checking of the leak detection inspection tubes. It is also proposed that the daily inspection of the ponds embankments be changed to correspond with the inspection of the leak detection tubes.

OPIC will periodically pump production wells in the mining unit No. 1 orebody aquifer so as to maintain a minimum 15 foot drawdown at the horizontal excursion monitor wells. This requirement as proposed would be in effect from approximately April through November each year depending on freezing conditions at the site. During the winter months when temperatures are sub-freezing OPIC proposes not to pump the wellfield. OPIC contends that such a pumping schedule will not cause any environmental degradation as the natural groundwater movement in the orebody aquifer is only 9 feet per year. The above pumping schedule has been utilized at the site since mine shutdown in September, 1982 with no adverse effects observed at the excursion monitor wells.

In terms of reporting OPIC proposes to continue the annual source material inventory report and the annual Land Quality Division report, but it is proposed that the semi-annual NRC report be changed to an annual report to coincide with the Land Quality Division's Annual Report. The Annual Report to the NRC would include the in-plant airborne radiation survey data.

Project Staffing and Security

OPIC proposes a staffing plan that will consist of a minimum of one mine employee at the site during normal working hours (8:00 a.m. to 5:00 p.m.) seven days a week. This staffing level will be from approximately March 15th to December 15th each year. From 5:00 p.m. in the evening until 8:00 a.m. in the morning OPIC

proposes to leave the site unmanned. During the approximate period December 16th to March 15th the site would be unmanned if the access road to the site is blocked by snow and the evaporation ponds are frozen; otherwise a minimum of one mine employee would be at the site in the winter during normal working hours. Permission from MSHA and the State Mine Inspector will be sought to allow only one mine employee to be on shift at the Bison Basin facility. OPIC will not reduce its mine site staffing to one person on shift unless MSHA and the State Mine Inspector approve. Letters of request are being mailed to these two agencies.

The person on shift at the Bison Basin mine will be thoroughly trained in his duties which will consist primarily of environmental surveillance and site security. Using the radio/telephone system installed at the mine, the individual on shift will call in to an established contact a minimum of twice each day. Failure to check in via the radio/telephone will prompt an immediate response by management.

During those periods when the facility is unmanned the plant building and personnel quarters will be locked. No trespassing and warning signs will be posted on the buildings and on the fence surrounding the evaporation ponds. If desired by the NRC and LQD, OPIC will install a security system that will transmit an alarm to management or the sheriff's office via the radio/telephone system whenever unauthorized persons enter the plant building.

OPIC as operator will employ a project manager officed in Wyoming to serve as agent and person in responsible charge for the Bison Basin facility. The project manager will be experienced in supervision of uranium solution mining facilities and will be knowledgeable in related environmental and safety regulations. If OPIC does not have an employee qualified as a Radiation Safety Officer (RSO) or Safety and Radiation Protection Engineer (SRPE) it will contract those services on an as needed basis.

Conclusion

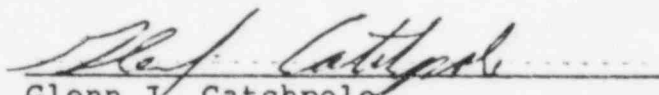
The Bison Basin mine staff in preparing the above monitoring and staffing requirements for a standby mode of operations has reviewed pertinent data and site conditions, and feels that the environment, and the public health and safety will be adequately protected. OPIC desires to adopt reduced monitoring and staffing requirements for standby operations as soon as possible and in this regard we will be most happy to discuss our proposal with

DEQ and NRC
Page 5
July 12, 1985

the LQD and the NRC to answer questions and attempt to resolve any issues of concern. OPIC appreciates and thanks both agencies for the expressed willingness (RE: meeting in Denver, 6/27/85) to respond quickly to this proposal for reduced monitoring and staffing. Because of the sensitivity of these issues in regards to current employees it is requested that this letter be kept confidential to the extent possible.

Sincerely,

OGLE PETROLEUM INC. OF CALIFORNIA


Glenn J. Catchpole
President and Project Manager

GJC:csq

cc: Roger Shaffer, LQD
W. R. Merrill

ENVIRONMENTAL MONITORING

<u>DESCRIPTION</u>	<u>PRESENT FREQUENCY</u>	<u>RECOMMENDED FREQUENCY</u>
Mining Unit No. 1 Excursion Monitor Wells (NRC #45)	Twice a month	Quarterly
Pond Monitor Wells (NRC #44 & Amendment No-13)	Quarterly	Quarterly
Pond Water Sample (NRC #79)	Quarterly	Suspend
Source Material Inventory (NRC #79)	Annual	Annual
Surface Water Samples (NRC #79)	Annual	Suspend
Sediment Samples (NRC #79)	Annual	Suspend
Soil Samples (NRC #79)	Annual	Suspend
Vegetation Samples (NRC #79)	Annual	Suspend
Environmental Radon Samples (outside air) (NRC #79)	Continuous (Passive, read monthly)	Suspend
Environmental TLD's (NRC #79)	Continuous (Passive, read quarterly)	Suspend
Land Use Survey (NRC #70)	Annual	Suspend
NRC Semi-Annual Report (NRC #75)	Semi-Annual	Annual (coincide with DEQ annual report)
DEQ Annual Report (NRC #75)	Annual	Annual
Evaporation Ponds Leak Detection Tubes (NRC #47)	Daily	Weekly Except Suspended When Ponds Frozen

Individual Well-Head Injection Pressure (NRC #47)	Daily	Suspend
Pond Embankment Inspection (NRC #63)	Daily	Weekly Except Suspend During Winter When Ponds Frozen
Flow Rate in Each Injection and Recovery Well (NRC #71)	Twice Daily	Suspend
Total Production and Injection Flows, Chemical Balance, etc. (NRC #72)	N/A	Suspend

RADIOLOGICAL MONITORING

<u>DESCRIPTION</u>	<u>PRESENT FREQUENCY</u>	<u>RECOMMENDED FREQUENCY</u>
Requirement for R.S.O. on Site (NRC #13)	N/A	Suspend
Requirement for Safety/ Radiation Protection Engineer (SRPE) on Site (NRC #13)	N/A	Suspend
R.S.O. Two Year Refresher Requirement (NRC #13)	Two Year (due in 1985)	Suspend
R.S.O. Review of Operating and Maintenance Procedures (NRC #14)	Annual	Suspend
R.S.O. or SRPE Daily Walk- Through Inspection (NRC #16)	Daily	Suspend
SRPE Weekly Inspection (NRC #16)	Weekly	Suspend
RSO's Monthly Report (NRC #16)	Monthly	Suspend
ALARA Audit (NRC #17)	Semi-Annual	Suspend
Training Requirements (NRC #18)	N/A	Suspend
Surveys of Change Rooms and Eating Areas (NRC #23)	Weekly	Suspend
Surveys of Control Rooms and and Administrative Offices (NRC #24)	Monthly	Suspend

In-Plant Airborne Radiation
Monitoring Program (NRC #26)

N/A

Semi-Annual

Bioassay Program (NRC #27)

Monthly

Suspend

Re-Calibration of Radiation
Monitoring Equipment (NRC #28)

Semi-Annual

Suspend
for Equipment not
being used, otherwise
annually