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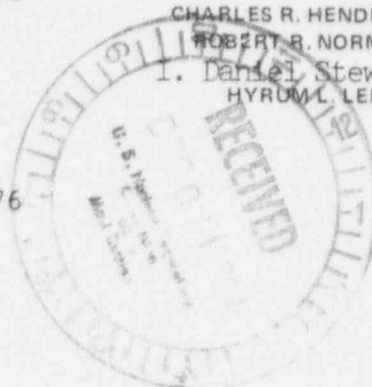
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CHARLES R. HENDERSON  
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1. Daniel Stewart  
HYRUM L. LEE

November 22, 1976



Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Mr. Ross Scarano

Re: Atlas Corporation - Moab, Utah  
Uranium Mill Site and Tailings  
Pond Stabilization & Monitoring

Gentlemen:

The purpose of this letter is to amend our letter to you of June 28, 1976, and set forth our understanding and agreement with respect to the division of responsibility between the Nuclear Regulatory Commission (NRC) and the Utah Division of Oil, Gas, and Mining in establishing requirements for reclamation of the mill site and tailings pond at Atlas Corporation's (Atlas) uranium mill in Moab, Utah, and in monitoring and maintaining such site and tailings pond after reclamation.

Pursuant to the Utah Mined Land Reclamation Act (Utah Code Annotated 1953, Title 40-8-1, et seq.) The Division of Oil, Gas, and Mining has established requirements for reclamation by Atlas of the mill site and tailings pond at the Moab, Utah mill when active operations at the mill are terminated. Such requirements are substantially those outlined as Alternative III in the August 15, 1975, report by Dames and Moore, a copy of which you have, except that the requirement for reshaping the slopes plan, estimated to cost \$616,000. would consist of the following:

- (1) Burial of 45 acres of fines with approximately 4.5 feet of beach materials. The final burial depth will be subject to approval by the NRC and the Division of Oil, Gas, and Mining and will be dependent upon depth measurements of soft slimes and results of tests to determine quantities of beach materials needed to provide a firm base for surface cover.
- (2) Covering of 97 acres of tailings pond with one foot of surficial material.



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- (3) Sludge application at the rate of 15 tons per acre, one-time irrigation and the establishment of vegetation through seeding and/or planting of 130 acres of pond and dikes. During the operating lifetime of the plant a demonstration program will be conducted to develop the optimum revegetation method.
- (4) Decontamination and removal of all equipment, machinery, debris and buildings.
- (5) Grading and cover of mill site and foundation pads.
- (6) Fencing of the tailings pond and mill site; and
- (7) Reshape all tailings pile slopes to a 3.1 (33%) slope.

Atlas has agreed to carry out such reclamation at its expense; such reclamation plan has been published and public comments received pursuant to the U.C.A. Title 40-8-10; and, the Board of Oil, Gas, and Mining has approved the plan. In accordance with U.C.A. Title 40-8-14, the Division of Oil, Gas, and Mining will now require Atlas to provide an acceptable surety arrangement to ensure that the approved reclamation plan will be completed when mill activities are terminated.

Upon Atlas' completion of the reclamation of the mill site and tailings pond in accordance with the approved plan, the Division will have full and sole responsibility for all future monitoring and maintenance of the reclaimed areas.

It is our understanding that on the basis of the foregoing representations and undertakings, NRC will have satisfied itself that acceptable reclamation, monitoring and maintenance arrangements have been made with respect to the tailings pond and mill area for purposes of its licensing of Atlas' milling operations. We will appreciate receiving your written confirmation of this understanding.

Very truly yours,

DIVISION OF OIL, GAS, AND MINING

*Cleon B. Feight*  
CLEON B. FEIGHT  
DIRECTOR

CBF/lc

cc: Brian Dolan  
Bill Badger

FROM <b>NEEK State Of UT Salt Lake City, UT</b>		DATE OF DOCUMENT <b>Nov. 22, 1976</b>	DATE RECEIVED <b>Dec. 1976</b>	NO <b>2022</b>
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TO <b>Ross Scavano</b>		<b>1</b>		
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ENCLOSURES		<b>Scavano</b>		
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