

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

June 9, 1997

Mr. Joseph J. Holonich, Chief  
Uranium Recovery Branch  
Division of Waste Management  
Office of Nuclear Materials Safety  
and Safeguards  
U.S. Nuclear Regulatory Commission  
M S T-7J9  
11545 Rockville Pike  
Washington, DC 20555-0001

Re: 11e.(2) Groundwater Monitoring Well Exceedences, Compliance Monitoring Plan  
License Number SMC1559, Amendment No. 9, Second Confirmatory Round  
Exceedences.  
Docket No. 40-8989

Dear Mr. Holonich:

Pursuant to Section 12.2 of Material License Number SMC-1559, Amendment 9, Reference 40-8989, Envirocare is notifying Region IV and the Chief, Uranium Recovery Branch, of apparent exceedences of the analytes listed in the following table, compared to baseline values in Table S-1 or Site Specific Values in Table STD-1. These apparent exceedences were observed during the second round confirmatory sampling, and are in addition to the apparent exceedences listed in our May 19, 1997, letter.

Based on previous exceedences, Envirocare implemented a site specific Compliance Monitoring Plan to qualitatively determine the reasons for the increases in arsenic and selenium. The results of the site specific Compliance Monitoring Plan were summarized in a report titled "Evaluation of Analytical Procedures for Groundwater Monitoring" which was submitted to the NRC on April 4, 1997. Based on the findings of this report, Envirocare has requested to amend the current license and establish new background concentrations for arsenic and selenium based on the new laboratory and analytical methods. These new concentrations are summarized in Tables S-1 and STD-1 in the amendment request.

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NRC-Compliance Plan

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Well ID	Analyte	Initial Conc. (mg/L)	Second Confirm Conc. (mg/L)	Current Table S-1 Conc. (mg/L)	Current Table STD-1 Conc. (mg/L)	Proposed Table S-1 <sup>1</sup> Conc. (mg/L)
GW-24	Arsenic	0.041	0.055	0.032	0.05	0.045
GW-63	Arsenic	0.044	0.041	0.034	0.05	0.053

<sup>1</sup> - Table S-1 and STD-1 concentrations are from the Request for License Amendment submitted on April 3, 1997.

NRC has conducted an initial processing of the amendment request and is currently conducting a detailed technical review. Envirocare will continue to follow the temporary Compliance Monitoring Plan until review of the amendment request is finished and corrected background levels are established. Envirocare is confident that the integrity of the Clive landfill and liner system is secure and that the apparent exceedances of these two wells, and the apparent exceedances of the ten monitoring wells listed in the May 19, 1997, letter, actually represent normal background concentrations for arsenic and selenium. These increases in background concentrations may be due to the change in analytical methods at the laboratory, changes in groundwater elevations, or other fluctuations caused by seasonal or geochemical changes.

Should you have any questions, please feel free to contact me at (801) 532-1330 or Dan Shrum at (801) 532-0920.

Sincerely,



Vernon Andrews  
Corporate RSO

cc: Bill Sinclair  
Region IV NRC  
Dr. David Turner  
Loren Morton