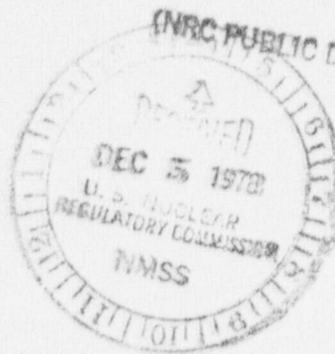


December 5, 1978

Gene Trager



Docket #40-8681

Mr. Jack Martin
Assistant Director
Fuels Cycle Safety and Licensing
United States Nuclear
Regulatory Commission
7915 Eastern Avenue
Silver Springs, Maryland 20901

RE: White Mesa Uranium Project - Archeology of Project Site

Dear Mr. Martin:

It has recently come to my attention that information pertaining to the status of certain archeological sites within the boundary of the proposed Energy Fuels Nuclear, Inc. White Mesa Uranium Mill has been prepared by your staff and included in your files. Because of this, we believe this letter is necessary for a proper understanding of the archeological significance of work conducted on the project site.

Early in 1977, in conjunction with its application for a source of materials license from the U.S. Nuclear Regulatory Commission, Energy Fuels requested a survey of archeological sites within the White Mesa project boundary. Dr. Richard Thompson, a well respected and qualified authority from Southern Utah State College, completed an intensive survey in December 1977. A copy of Mr. Thompson's report was filed with my office and has been available to the public since that time.

After receiving the Thompson report, Energy Fuels contacted the Utah State Archeologist regarding the White Mesa project and asked him to determine the significance of the archeological sites identified in Thompson's survey. In February 1978, the State Archeologist agreed to test all archeological sites which may be affected by the White Mesa project. The report of the State Archeologist, issued in May 1979, resulted from this testing. It too has been available to the public since the date of issuance.

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NOTES ON: INDUSTRIAL DEVELOPMENT TRAVEL DEVELOPMENT EXPOSITIONS STATE HISTORY, ETC.



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The study undertaken by the State Archeologist was at the insistence of and with the complete cooperation of Energy Fuels. On June 13, 1978, Energy Fuels met with the State Archeologist and Wilson Martin to discuss a program for the recovery, avoidance or mitigation of adverse effect to archeological sites identified as potentially significant in the test work. The work to identify significant sites and sites that will be adversely effected is nearly complete and while certain sites within the property may be significant under the federal criteria, as more fully explained in the State Archeologist's report, you should be aware that the significance of these sites lies not with their becoming public attractions or monuments, but rather with the information they have yielded about certain prehistoric cultures. Sites of this nature are plentiful throughout the southeastern part of Utah, but have not been tested. It is only the opportunity presented by the desire of Energy Fuels to build a uranium mill in this area that permitted us to devote the time and energy to a thorough study of such sites. In essence, Energy Fuels' project will permit the recovery of archeological data that without the project probably never would have been recovered.

In the near future the State Historic Preservation Office will provide comments on eligibility and adverse effect. We are more than willing to mitigate any adverse effect in accordance with provisions of a memorandum of agreement. We anticipate that the sites of significance will be treated as part of a multi-resource or district nomination in our future letter.

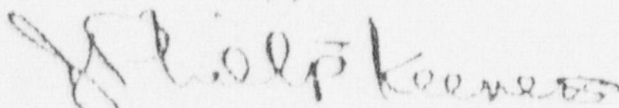
Energy Fuels has taken an exceptional and commendable interest in and has fully cooperated with both the State Archeologist and the State Historic Preservation Office to insure that the proposed project on the White Mesa will mitigate any adverse effect on archeological resources in the area. There is no doubt in my mind that the proposed project should go forward and that in so doing will recover significant scientific data which could not be recovered if the project didn't proceed.

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If you have any questions or concerns, please contact Wilson G. Martin, Preservation Development Coordinator, Utah State Historical Society, 307 West 200 South, Salt Lake City, Utah 84101, (801) 533-6017.

Sincerely,



J. Phillip Keene III
Executive Director
and

State Historic Preservation Officer

WGM:jr/B746SL/J-1

cc Mr. Ross Scarano, Fuels Cycle Safety and Licensing, United States Nuclear Regulatory Commission, 7015 Eastern Avenue, Silver Springs, Maryland 20901

E. A. Tinger, Fuels Cycle Safety and Licensing, United States Nuclear Regulatory Commission, 7015 Eastern Avenue, Silver Springs, Maryland 20901

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