



State of Utah

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DIVISION OF RADIATION CONTROL  
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DRC-2011-001049



January 12, 2011

CERTIFIED MAIL  
(Return Receipt Requested)

Ms. Jo Ann Tischler  
Director, Compliance and Permitting  
Denison Mines (USA) Corp. (DUSA)  
1050 17<sup>th</sup> Street, Ste. 950  
Denver, CO 80225

Dear Ms. Tischler:

SUBJECT: December 20, 2010 DUSA Response to Request for Information regarding Reclamation Plan, Submittal of Reclamation Plan Revision 3.2A; November 30, 2010 DRC Comment Letter; Request for Information

We received a DUSA letter dated December 20, 2010 on the subject, which submits the *White Mesa Mill Reclamation Plan Revision 3.2A*. It appears the majority of Rev. 3.2A was also transmitted by two emails from DUSA dated December 20, 2010. The subject DUSA letter was sent in response to our comment letter of November 30, 2010.

We have reviewed the subject DUSA submittal and have the following comments and requests:

1. Our letter of November 30, 2010, paragraph 3, stated that, "Existing Figure A-5.1-2 in approved Revision 3.1 appears to contain cross sections and details which are essential to be retained in the Reclamation Plan."
  - a. Therefore, existing Figure A-5.1-2 must somehow be retained and not replaced by the Addendum..."

Recap:

The referenced Figure A-5.1-2 in *Reclamation Plan Rev. 3.1* (labeled on the figure to include drawings through Rev. No. 4 dated July 9, 2008), provides Section A-A' and Details 1 through 3. The figure is titled, "...Reclamation Cover Details and Cross Section."

In contrast, *Reclamation Plan Rev. 3.2* provided a Figure A-5.1-2 titled, "Reclamation Cover and Cross Sections..." This figure provided Sections B-B', C-C', and D-D'. Not the same sections or details as Rev. 3.1. As stated in DUSA's letter of June 29, 2010, it appeared that this figure was provided as a "replacements for" the figure of the same figure number. However, the latter Figure A-5.1-2 (Rev. 3.2) does not contain any of the drawings provided in the earlier Rev. 3.1 figure of the same name. Therefore, to keep the

original drawing concepts provided on Figure A-5.1-2 (Rev. 3.1), DRC requested that the, "existing Figure A-5.1-2 must somehow be retained and not replaced by the Addendum..."

Comment:

After receipt of the subject letter of December 20, 2010, we have compared the submitted figures in Rev. 3.2A with the corresponding previous figures in Rev. 3.1. It appears that proposed Figures A-5.1-2 and A-5.1-3 are not the same as the Rev. 3.1 figures of the same number. Also, some correction to the drawings is needed.

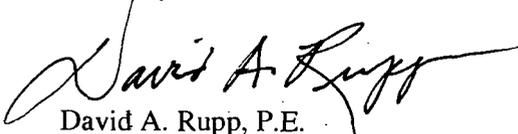
In as much as these figures are to replace the corresponding figures of the same number as part of a formal addendum, we request you please correct the following:

- a. Correct a transposition of figure numbers by changing the figure numbers proposed as Figures A-5.1-2 and A-5.1-3 in Rev. 3.2A to correspond to the figures of the same number from Rev. 3.1.
  - b. Section D-D' needs to be revised to include the addition of Cell 4B.
2. In Rev. 3.2A, Appendix G, a technical memorandum from MWH dated January 29, 2010 is provided. This gives the design justification for the 6-inch thick filter blanket on cell outside slopes of the cells. This memo was not provided in the subject Emails sent. This item must be provided in electronic format as well as the paper copy of the Reclamation Plan.
  3. In our letter of November 30, 2010, we requested that, "the cover and the text of Reclamation Plan be revised to state that Reclamation Plan Revision 3.2 is in the form of an Addendum to Reclamation Plan 3.0 and 3.1." However, the subject DUSA December 20, 2010 letter describes Rev. 3.2A is an addendum to proposed Rev. 3.2. This designation will lead to confusion, which must be avoided. Please revise the plan's cover, text and transmittal letter to show that the next version, e.g. Rev. 3.2B, is an addendum to Rev. 3.0 and Rev. 3.1 (which have already been approved by the DRC). Rev. 3.2B needs to be complete, and not rely on the previous Rev. 3.2 or 3.2A addendums.
    - a. In response to our letter mentioned above, the DUSA letter of December 20, 2010 provides a replacement cover, which states, "Addendum/Changed Pages for the White Mesa Mill and Tailings Management System." However, the Reclamation Plan addendum cover needs to be edited to be explicit and accurate as to what the addendum applies to in accordance with the above paragraph.
    - b. Also, the text of the Reclamation Plan addendum (Rev. 3.2A) does not address this point, as requested in the mentioned DRC letter. A separate preface page in the addendum may be an appropriate method to address our request.
    - c. Please assure that Rev. 3.2B is complete, and does not rely on the previous Rev. 3.2 or 3.2A addendums.
  4. The upcoming revised edition of the Reclamation Plan Revision 3.2 (i.e. a revision of the Addendum) will need to be identified by a unique edition name, but still retain the Reclamation Plan Revision 3.2 label, e.g. "Edition B," or other method for identifying the unique edition.
  5. We recognize that in the process of DRC review and DUSA response that identification needs will require designation of editions or versions such as B, C, etc. However, we request that when the final revision is ready for approval that DUSA submit a final document labeled as Rev. 3.2-final.

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Please review the above comments, and respond in writing including an electronic copy, by submitting a unique revised edition of Reclamation Plan Revision 3.2 for approval. Please assure that the electronic and paper copies agree in content. DUSA's response time on this letter is left to DUSA's discretion, in as much as the approval of Reclamation Plan Rev. 3.2 is a License Condition for DRC authorization for use of Cell 4B. If you have any questions on the above, please contact me.

Sincerely,

A handwritten signature in black ink that reads "David A. Rupp". The signature is fluid and cursive, with a long horizontal stroke at the end.

David A. Rupp, P.E.  
Geotechnical Services Section

LBM:DAR:dr

Cc: Harold R. Roberts, V.P. US Operations

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