



State of Utah

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Department of
Environmental Quality

Amanda Smith
Executive Director

DIVISION OF RADIATION CONTROL
Rusty Lundberg
Director

DRC-2011-001233



January 21, 2011

CERTIFIED MAIL
(Return Receipt Requested)

Ms. Jo Ann Tischler
Director, Compliance and Permitting
Denison Mines (USA) Corp (DUSA)
1050 17th Street, Suite 950
Denver, CO 80265

Dear Ms. Tischler:

SUBJECT: January 10, 2011 DUSA Letter, Transmits Revised DMT and BAT O&M Plans, which addresses White Mesa Uranium Mill Tailings Cell 4B, etc.; January 6, 2011 DRC Letter, Review of DMT and BAT O&M Plans; Cell 4A and 4B BAT Monitoring, Operations and Maintenance Plan (O&M Plan): Request for Information

We have reviewed the subject letter from DUSA dated January 10, 2011, which is a response to the subject DRC comment letter of January 6, 2011. The DUSA letter proposes the two subject documents, noted above. However, this letter only addresses the proposed O&M Plan, as revised, known as *The Cell 4A and Cell 4B BAT Monitoring, Operations and Maintenance Plan, 01/2011 Revision Denison 2.1.*

After review of this plan, we have the following comments with reference to the submitted redline copy:

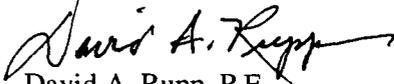
1. On page 14, there is a proposed redlined phrase in the sentence beginning with, "Each pump is equipped with a pressure sensing transducer..." in redline it states, "for Cell 4A and 3 inches for Ceil 4B)." The "3 inches" must be changed to "2-1/4 inches (0.19 feet)," or other acceptable measurement.
2. We earlier provided this request as comment VII of our January 6, 2011 letter, regarding freeboard calculations. DUSA has chosen to propose this O&M Plan, as if Cell 4B was approved for use.
 - a. Therefore, the section beginning on page 15, titled "Cell 4A Solution Freeboard Calculation," needs to be re-titled to "Solution Freeboard Calculations," (as this section provides freeboard calculations for Cell 1 and 4B) or another acceptable title.
 - b. The last sentence of this section, on page 17 needs to delete the reference to Cell 4A.
3. On page 5, paragraph d.2, there is a proposed redline change. The 18-inch diameter (proposed to be deleted) is correct in accordance with the CQA Report record drawings, and must be retained. The redline change proposed, i.e. a 2-foot inside diameter pipe is incorrect, and should be removed.

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Please review the above comments, and respond in writing, submitting corresponding complete revised copies of the subject O&M Plan, given a new and unique version number. DUSA's response time on these types of letters is left to DUSA's discretion, in as much as the approval of the O&M Plan is a requirement for a 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, appearing to read "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

DAR:dr

Cc: Mr. Harold Roberts, DUSA

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