

July 11, 2008

Mr. Dane L. Finerfrock, Executive Secretary
Utah Radiation Control Board
Utah Department of Environmental Quality
PO Box 144810
Salt Lake City, UT 84114-4810

Re: Shootaring Canyon Uranium Mill Amendment Request for Radioactive Material License No. UT 0900480, Response to Ground Water Interrogatories and Submittal of a Proposed Groundwater Monitoring Plan for Full Operational Status.

Dear Mr. Finerfrock:

Uranium One respectfully submits responses to Interrogatory R317-6-2.1-27/03: Groundwater Monitoring. As part of these responses, Uranium One has prepared a revised Ground Water Monitoring Plan. This Ground Water Monitoring Plan is proposed for the fully operational status being requested as part of the current license amendment request in order to comply with UAC317-6, UAC R313-24 and, by reference, 10 CFR Part 40 Appendix A. If approved, it is anticipated that this plan would be incorporated into a revision of Radioactive Materials License UT0900480 as well as into a revision of the Ground Water Discharge Permit UGW170003 as part of the approval for the request to return to full operations status.

This plan consists of the *Shootaring Canyon Mill Site Ground Water Monitoring Plan* (Tetra Tech, June 2008), which includes the *Ground Water Monitoring Quality Assurance Plan (QAP)* and the *Standard Operating Procedure EP-1 Ground Water Sampling*, which is the procedure that implements the Monitoring Plan and QAP. This plan was developed based on the two additional documents, a) *Groundwater Modeling and Proposed Monitoring Wells for the Shootaring Canyon Mill Tailings Disposal Facility* (Gard Water Consultants, June 2008) and b) *Ground Water Geochemical Evaluation And Background Water Quality Determination For The Shootaring Canyon Mill Site* (Tetra Tech, June 2008). These documents are attached for review with the responses to interrogatory R317-6-2.1-27/03.

These documents supersede the *Draft Groundwater Monitoring Plan (Plan)* dated 11/30/07 and the *Shootaring Background Water Quality* document (December 12, 2007) submitted previously.

Please find enclosed two hard copies of this submittal and a computer disc with the submittal in Adobe Acrobat (pdf) format.

One minor deviation to UAC R317-6 is proposed. UAC R 317-6-6.16 states that monthly sampling should occur if a constituent exceeds both the background concentration of the pollutant by two standard deviations and an applicable permit limit, *unless the Executive Secretary determines that other periodic sampling is appropriate*. It is proposed that quarterly sampling rather than monthly sampling of wells should occur if a constituent exceed compliance limits. Quarterly rather than monthly sampling is proposed as appropriate because maximum ground water flow velocities are approximate 8 feet per year.

Should you have any questions, please contact me at (970) 231-1160.

Sincerely,
Uranium One

Toby Wright, PG
Environmental Manager

Enclosure

cc: Mill site
John Hultquist (UDEQ\DRC; w/out enclosure)
Rod Grebb, Tetra Tech
Melanie Davis, Tetra Tech
file