

MEMORANDUM

TO: Envirocare File

FROM: Bill Sinclair, Director *BS*  
Division of Radiation Control

SUBJECT: Meeting, December 3, 1993 with Charles Judd and Mike Keller

DATE: December 6, 1993

Denise Chancellor from the Utah Attorney General's Office and Bill Sinclair met with Charles Judd and Mike Keller as a follow-up to the meeting of November 24, 1993, where Khosrow Semnani of Envirocare expressed concern to Dianne Nielson that he perceived UMETCO was becoming or operating as a commercial low level waste disposal facility. The major concern was that UMETCO has a license from NRC to receive material from other facilities, much of it being out of state waste.

Envirocare also raised concerns in regards to the recent NRC licensing actions relating to the receipt of in situ mining waste for disposal and the Allied Signal material for reprocessing. Envirocare feels that NRC's licensing was not appropriate due to their findings of no significant impact for the two licensing actions. Envirocare also perceived that NRC had issued "open ended" licensing actions which would allow receipt of thousands of tons of material. Envirocare pointed out they had spent considerable funds pursuing their uranium mill tailings disposal cell and felt that they had "to do more" (e.g. payment of disposal fees). Envirocare also pointed out that UMETCO was not subject to any requirements for testing of incoming material.

Envirocare had three suggestions for the Division to pursue:

1. Bring this issue before the Utah Radiation Control Board
2. Require UMETCO to get a groundwater discharge permit
3. Act upon the policy question of gubernatorial/legislative approval