

May 4, 2015

Ms. Mary Hopkins
State Historic Preservation Officer
Wyoming State Historic
Preservation Office
2301 Central Avenue
Barrett Building, Third Floor
Cheyenne, WY 82002

SUBJECT: CONSULTATION REGARDING UMETCO MINERALS CORPORATION
REQUEST TO INSTALL A GROUND WATER MONITORING WELL AT THEIR
GAS HILLS WYOMING SITE (DOCKET NO. 040-00299)

Dear Ms. Hopkins:

By letter dated January 22, 2015, Umetco Minerals Corporation (Umetco) requested an amendment to its U.S. Nuclear Regulatory Commission (NRC) radioactive materials license SUA-648 to revise the ground water monitoring program at Umetco's Gas Hills site in Fremont and Natrona counties, Wyoming (Agencywide Document Access and Management System (ADAMS) Accession Number ML15027A095). The Gas Hills site ceased uranium milling operations in 1984 and is currently in decommissioning status. On April 8, 2015, Umetco revised its request to address several questions raised by the NRC staff on November 6, 2014 (ADAMS Accession No. ML14301A282) regarding the ground water at the Gas Hills site (ADAMS Accession No. ML15103A024).

Umetco's proposed revision to the ground water monitoring plan includes the installation of 4 additional ground water monitoring wells at the site. One of the proposed new wells, MW-86, is on land with surface rights owned by Umetco, while the remaining proposed wells, MW-83, MW-84, and MW-85 are on land under the jurisdiction of the Bureau of Land Management (see enclosed map, Proposed Monitoring Wells, April 2015).

The monitoring well on Umetco's property will be installed in an extensively disturbed area. While the mill was still in operation, a process water pipeline was placed where Umetco now has proposed to place the new monitoring well MW-86. Umetco removed 18,000 cubic yards of material from the pipeline trace as part of remediation of the area during decommissioning of the mill site (ADAMS Accession No. ML04250395).¹ Two maps showing the location of the pipeline (Site Plan and Location Map, Gas Hill, Wyoming) and the proposed location for

¹ Final Status Survey Report, Gas Hills, Wyoming Site (August, 2004), pages 46 & 52. The final plan reports that 18,338 cubic yards of material was removed from DW-6, the location of the proposed monitoring well, and placed in the repository area A-9, to the southeast. See attached Site Plan and Location Map, Gas Hills (April 2004). The removal was done to reduce concentrations of Ra-226 to levels below or at background level at DW-6.

monitoring well MW-86 (Proposed Monitoring Well, Gas Hill, Wyoming) are included for your information. The NRC determined this action is not an undertaking with the potential to adversely affect historic properties. First, very limited ground disturbance is anticipated to be associated with the construction of the well. Second, the prior disturbance of the area was so great that no undisturbed land surfaces or subsurface areas remain.

The Bureau of Land Management was responsible for Section 106 evaluations pursuant to The National Historic Preservation Act.² The cultural resources evaluations were most recently updated in February 1998³ and April 1999.⁴ Additional Section 106 work has not been required because the site is in decommissioning and no activities have taken place requiring Section 106 investigations.

License Condition 33 of Umetco's radioactive materials license⁵ requires that cultural resources surveys be conducted on unsurveyed and undisturbed areas prior to the work being undertaken at the site. Normally, License Condition 33 would require a Section 106 survey; however, in this case, the NRC staff believes that a survey is not necessary because MW-86 will be drilled in a previously disturbed location.

License Condition 33, also stipulates that, if Umetco performs construction activities outside of the proposed area, it must advise the NRC and conduct a cultural resources survey. NRC authorization must be obtained prior to proceeding with construction. In addition, License Condition 33 stipulates that all work in the immediate vicinity of any buried cultural deposits unearthed during the disturbance, shall cease until approval to proceed has been granted by the NRC. The NRC staff will advise the Wyoming State Historic Preservation Office if Umetco's actions require implementation of License Condition 33 and provide supporting documentation.

We are informing you of our conclusion to allow you to provide the NRC with any concerns or comments you may have regarding the undertaking.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's ADAMS. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

² "Class III Cultural Resource Inventory for 535 Acre Block Survey Located in Sections 10,11,T33N, R89W,Natrona County, WY, July 1997," see ADAMS Legacy Accession No. 9802170018.

³³ Letter (with enclosure) from T. Gieck, Umetco, to J. Holonich, NRC, transmitting the "Class III Cultural Resources Inventory," February 4, 1998. (ADAMS Legacy Accession No. 9802170018).

⁴ Letter providing outline of current status of section 106 cultural resource compliance work associated with proposed reclamation activities at Gas Hill site (with enclosures) from T. Gieck, Umetco, to N.K. Stablein, NRC, April 14, 1999. (ADAMS Legacy Accession No. 9904190120).

⁵ Umetco Minerals Corporation License Number SUA-648 Amendment No. 61, Condition 33 (Feb. 18, 2009) (ADAMS Accession No. ML090210391).

M. Hopkins

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If you have any questions concerning this letter or the staff's evaluation, please contact me at 301-415-6749 or by email at Dominick.Orlando@nrc.gov.

Sincerely,

/RA/

Dominick A. Orlando, Senior Project Manager
Materials Decommissioning Branch
Division of Decommissioning, Uranium Recovery
and Waste Programs
Office of Nuclear Material Safety
and Safeguards

Docket No. 040-00299

Enclosure: Well location maps

cc: Umetco Distribution List

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