

August 18, 2015

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

SUBJECT: REVISION TO PROPOSED DIRECT AND INDIRECT AREAS OF POTENTIAL EFFECT FOR THE SMITH RANCH PROJECT PROPOSED LICENSE RENEWAL (DOCKET NO. 40-8964; WYOMING STATE HISTORIC PRESERVATION OFFICER FILE NO.: 0499RLC034)

Dear Ms. Hopkins:

The U.S. Nuclear Regulatory Commission (NRC) has received your letter dated June 4, 2015, in which you provided comments on NRC's proposed direct and indirect "area of potential effect" (APE) for an application from Power Resources, Inc., d/b/a Cameco Resources (Cameco), to renew NRC source material license SUA-1548 and so authorize an additional 10 years of in situ uranium recovery (ISR) operations at Cameco's Smith Ranch Project (the Project). The Project consists of the following properties: (1) the Smith Ranch Site in Converse County, Wyoming; (2) the Gas Hills property in Fremont and Natrona Counties, Wyoming; (3) the North Butte property in Campbell County, Wyoming; and (4) the Ruth property in Johnson County, Wyoming.

In your letter, you stated that previously disturbed areas should be accounted for when considering the level of effort required for the identification of historic properties pursuant to Title 36 of the *Code of Federal Regulations* (36 CFR) 800.4(b)(1). Additionally, you questioned why trunkline construction to support the wellfields was not considered part of the direct APE. Finally, you noted that a radius of 3 miles from the direct APE boundary was appropriate for determining the indirect APE.

With respect to the first issue regarding previously disturbed areas, the NRC recognizes that the proposed undertaking, if approved by NRC, would allow Cameco to continue ISR operations in these areas, as well as allowing ISR operations in expansion areas identified to NRC by Cameco in its license renewal application. Therefore, the NRC has redefined the direct APE for the Smith Ranch and for the North Butte sites in accord with your comment, to include both existing and proposed areas of ISR operations. Enclosures 1 and 2 provide the redefined direct APE for the Smith Ranch site and for the North Butte site, respectively.

As stated in our previous letter, historic and cultural surveys have been performed at the Smith Ranch site since the initial approval of ISR operations in the late 1970s and early 1980s and as ISR operations expanded at the site. The NRC licensing actions at those times addressed potential effects to identified historic and cultural resources. Additionally, Condition 9.9 of SUA-1548 in part states that "In order to ensure that no unapproved disturbance of cultural

resources occurs, any work resulting in the discovery of previously unknown cultural artifacts shall cease. The artifacts shall be inventoried and evaluated in accordance with 36 CFR Part 800, and no disturbance of the area shall occur until the licensee has received authorization from the NRC to proceed." The NRC staff expects that this condition would be retained in SUA-1548 should license renewal be approved.

The enclosed maps also address the second issue concerning trunklines, which Cameco states will be aligned with existing roads, as noted in our previous letter. The direct APE includes the trunklines in the identified area and in the areal estimate for the APE (except when overlap of trunklines with existing or proposed mine units would cause double-counting in the estimate). As noted in our previous letter, the direct APE also includes areas to be directly impacted by the installation of injection, production, and monitoring wells for each mine unit and by the installation of fencing surrounding the mine unit, and also a virtually undisturbed buffer area between the mine unit injection/production wells and the surrounding monitor well ring located approximately 400-500 feet away.

Finally, the NRC staff has redefined the indirect APE boundary to extend 3 miles from the direct APE boundary, as recommended in your letter. Enclosures 3 and 4 provide the redefined indirect APE for the Smith Ranch site and for the North Butte site, respectively.

Should you have any further comments concerning the delineation of the direct APE or the indirect APE, please submit within 30 days of the date of this letter by mail to the NRC Attn: Ms. Lydia W. Chang, Mail Stop: T-4B16, Washington, DC 20555. If you have any questions on the proposed project or need any additional information regarding this matter, please contact Mr. James Park by phone at (301) 415-6954, or via email at James.Park@nrc.gov.

Sincerely,

/RA/

Lydia W. Chang, Chief
Environmental Review Branch
Division of Fuel Cycle Safety, Safeguards,
and Environmental Review
Office of Nuclear Material Safety
and Safeguards

Docket No.: 40-8964

Enclosures:

1. Direct APE for the Smith Ranch Site
2. Direct APE for the North Butte Site
3. Indirect APE for the Smith Ranch Site
4. Indirect APE for the North Butte Site

cc: Mr. Richard L. Currit
Mr. Larry McGonagle

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