

Saxton, John

From: Mike Griffin <MGriffin@stratawyo.com>
Sent: Wednesday, April 27, 2016 2:12 PM
To: Saxton, John
Cc: Ralph Knode
Subject: [External_Sender] Exceedance of action level in Pond Monitor P1-C3

Hi John:

I left you a voicemail and would like to follow-up with the following information on an exceedance of an action level on Pond Monitor P1-C3. The chloride concentration in pond monitor well P1-C3 was measured at 13.3 mg/L from the monthly sample obtained on April 25, 2016. This meets the criteria for a suspected release from the pond as defined in Section 3.2.3 of the CPP Groundwater Detection Monitoring Program (GWDMP) since the concentration exceeds the action level (AL) of 10.2 mg/L by at least 20%. Strata collected a verification sample on April 26, 2016, which had a concentration of 14.01 mg/L, confirming the criterion is exceeded. The other indicator parameters were below their respective action levels.

In accordance with the commitments in Section 3.2.3 of the GWDMP, Strata is required to perform the following immediate actions consistent with the excursion reporting and corrective action procedures in LC 11.5:

- 1) Notify the NRC Project Manager by telephone or email within 24 hours of confirming that the release criterion has been exceeded, and by letter within 7 days.
- 2) Immediately sample the groundwater in all compliance monitor wells associated with Pond 1 and evaluate samples for the full suite of parameters in Table 5.7-2 of the approved license application (as amended). Strata is preparing to obtain these samples for analysis by a contract laboratory.
- 3) Increase the groundwater detection monitoring frequency for all compliance monitor wells to at least once every 7 days for nonhazardous indicator parameters until three (3) consecutive samples are at or below the action levels.
- 4) Conduct an investigation to determine the probable cause of the release to groundwater.

The water quality results show that the chloride exceedance is likely a result of natural variation in shallow groundwater quality that was not captured during the background sampling period. The following table shows that neither alkalinity nor conductivity increased in the April 25 sample, providing strong evidence that no release to the environment has occurred. The table includes data from MW P1-C1 since that well exceeded the AL but not by 20%.

Station Name	Sample Date	Alkalinity (as CaCO ₃)		Chloride		Laboratory conductivity	
		Measured	AL	Measured	AL	Measured	AL
MW P1-C1 (Cell 1—North)	8/13/2015	557	1,128	7.7	10.2	2,910	4,120
	8/31/2015	516		6.9		2,670	
	9/30/2015	503		6.7		2,710	
	10/28/2015	508		6.2		2,580	

MW P1-C3 (Cell 3— South)	1/22/2016	481	8.7	2,430
	4/25/2016	480	10.3	2,190
	8/13/2015	819	8.1	3,370
	8/31/2015	789	8.4	3,200
	9/30/2015	769	8.0	3,450
	10/28/2015	800	8.4	3,280
	1/22/2016	799	10.8	3,060
	4/25/2016	780	13.3	3,430
	4/26/2016		14.0	

In the future Strata may update the ALs for pond monitor wells to account for the natural variation in the shallow groundwater consistent with EPA Unified Guidance (EPA, 2009, Section 5.3).

Please call me if you have any questions.

Thanks
Mike

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