

July 1, 2016

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

FROM: Jessie Muir Quintero, Project Manager /RA/
Environmental Review Branch
Division of Fuel Cycle Safety, Safeguards,
and Environmental Reviews
Office of Nuclear Material Safety
and Safeguards

SUBJECT: SITE VISIT TRIP REPORT FOR THE PROPOSED KENDRICK
EXPANSION PROJECT (DOCKET NUMBER: 040-09091;
LICENSE NUMBER: SUA-1601)

From April 18, 2016 through April 21, 2016, the U.S. Nuclear Regulatory Commission (NRC) staff and its contractor conducted a site visit at the proposed Strata Energy Inc. (Strata) Kendrick expansion project site. In addition to Strata, the NRC team met with other local, State, and Federal agencies. A summary of the site visit is enclosed (Enclosures 1 and 2). The purpose of the site visit was to gather information to be considered in the NRC's Supplemental Environmental Impact Statement for the proposed Kendrick project. To facilitate its review, the NRC provided Information Needs to Strata prior to the site visit (Enclosure 3).

Docket No.: 40-9091
License No.: SUA-1601

Enclosures:
1. Visit Summary
2. Crook County Meeting Summary
3. Information Needs

CONTACT: Jessie Muir Quintero, NMSS/FCSE
(301) 415-7476

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ADAMS Accession No.: ML16166A368

OFC	FCSE/ERB	FCSE/ERB	OGC	FCSE/ERB	FCSE/ERB
NAME	JQuintero	AWalker-Smith	EMonteith	LChang	JMQuintero
DATE	06/28/16	06/30/16	06/28/16	06/30/16	07/01/16

OFFICIAL RECORD COPY

NRC Site Visit to Strata's Proposed Kendrick Expansion Site April 18-21, 2016

Participants

Jessie Muir Quintero, NRC
Jean Trefethen, NRC (Tuesday and Wednesday)
Dr. Abe Zeitoun, SC&A (Wednesday and Thursday)
Milton Gorden, SC&A
Dr. Paul Nickens, SC&A
Connie Walker, SC&A
Rene Ohms, National Park Service – Devils Tower (Tuesday only)
Sarah Stokely, Advisory Council on Historic Preservation (Tuesday and Wednesday)
Richard Currit, Wyoming State Historic Preservation Office (Tuesday and Wednesday)
David Ferguson, GCM Services (Wednesday only)
Ray Moores, WWC Engineering (Wednesday only)
Ben Schiffer, WWC Engineering (Tuesday and Wednesday)
Mike Griffin, Strata Energy
Ralph Knode, Strata Energy

Summary

The U.S. Nuclear Regulatory Commission (NRC) and contractor staff conducted this site visit to gather supplemental information about the Kendrick site, the proposed action, and the contents of the license amendment application, including the Environmental and Technical Reports, by interacting directly with Strata Energy, Inc. (Strata) and its contractor. During the site visit, the NRC staff discussed Information Needs with Strata and elicited some of the necessary information. The staff toured the parts of the Ross site, the Kendrick property, and their surroundings in order to have a better understanding of the Kendrick site and to independently assess some of the characteristics described in the application. The staff also took the opportunity to meet with other stakeholders, including representatives of the Crook County government.

On **Monday, April 18, 2016**, Mr. Gorden conducted an independent site surveillance of the Ross and Kendrick sites and surrounding region to observe the roads in the area and identify nearby activities and residences. He noted that the majority of D Road consisted of dirt and gravel, although the Environmental Report had indicated that it was a paved/reclaimed asphalt road.

Dr. Nickens visited the Crook County Historical Society and Museum, located in Sundance, Wyoming, to determine whether the society held any additional information about the historical resources of the Oshoto area. Discussions with Mr. Rocky Courchaine, Director of the museum, indicated that the only historical entity of note in the Oshoto vicinity is the Cayuse Ranch (<http://cayuseranch.com/index.html>), belonging to the Brislawn family. This ranch is known internationally for its breeding and preservation activities related to Spanish Mustangs originally brought to North America in the 15th Century. The ranch is located about 7 miles from Oshoto, well away from the Kendrick project area. A book was purchased at the museum,

written by Mabel “Dipper” Brislawn: “Spanish Mustangs and Hard Times,” The Bob Brislawn Memorial Society, 2014.

On **Tuesday, April 19, 2016**, the participants met at Strata’s Ross administrative office. Mr. Griffin, along with personnel from Strata contractor, WWC Engineering, guided the initial meeting to discuss the objectives of the visit. Before the visit, the NRC had provided a list of initial Information Needs based on the staff’s review of the application. Strata gave a site tour of the Ross site to NRC staff and SC&A personnel. The tour encompassed the Ross CPP and the lined retention ponds. Due to weather and road conditions, a Kendrick site tour was not possible. Instead, the participants broke out into resource-specific discussions. Discussions centered on the Information Needs (Enclosure 3). There were two sets of discussions, one for Historic and Cultural Resources and the other for all other resource areas. A summary of both discussions are provided below.

Historic and Cultural Resources – Mrs. Jessie Muir Quintero, Mrs. Jean Trefethen, Dr. Paul Nickens, Ms. Rene Ohms, Mrs. Sarah Stokely, Mr. Richard Currit, Mr. Ben Schiffer

A significant objective of the site visit involved coordinating National Historic Preservation Act Section 106 activities for the Kendrick project, including addressing overlap between several archaeological and tribal sites along the boundary line between the Kendrick and Ross project areas. The Ross sites are currently being handled under the Ross Programmatic Agreement (PA). The Section 106 discussions had the following objectives:

- Coordinate issues of overlap between 10 previously recorded archaeological and/or Tribal sites where either cultural site boundaries, proposed project activities, and/or recommended protective cultural site buffer zones cross over Ross/Kendrick project boundary lines.
- Discuss the proposed field strategy to achieve final National Register of Historic Places (NRHP) eligibility recommendations for 14 presently “unevaluated” archaeological sites at Kendrick, including formal testing at 12 of the sites.
- Review the need for input by the Kendrick Consulting Tribes for (1) potential traditional cultural properties (TCPs) or other places of potential religious or cultural significance within the project area, (2) tribal consultation for three of the presently “unevaluated” Kendrick archaeological sites, and (3) the potential for additional consultation under the Ross PA for any sites included in the Kendrick Testing Plan.

Multiple Resources – Mr. Milton Gorden, Mrs. Connie Walker, Mr. Mike Griffin

Mr. Gorden and Mrs. Walker reviewed the Information Needs with Mr. Griffin and Strata contractor staff. The NRC sought clarification on topics including waste management, ground water and surface water characteristics, transportation networks, air quality, ecology, public and occupational health, monitoring stations, land use, and cost/benefits. The purpose of the discussion was to identify any Information Needs that required clarification by the NRC, determine whether Strata could provide documentation during the site visit to satisfy some of the Information Needs, and note which Information Needs will be put in the form of Requests for Additional Information (RAIs). Strata provided the NRC with the following documentation:

- “Memorandum of Understanding for Improvement and Maintenance of Crook County Roads Providing Access to the Ross In Situ Recovery (ISR) Project”;
- Maps of the proposed Barber Expansion Area;
- “Ross ISR Baseline Light Pollution and Reporting,” dated March 26, 2015, and April 5, 2016;
- Ross air quality permit application and permit, and
- Ross ISR Project, Mine Unit 1 Wellfield Data Package, including Attachments 1-13, July 2015.

On **Wednesday, April 20, 2016**, the participants met again at the Ross administrative offices and continued resource-specific discussions. Those involved with the historic and cultural resources went on a tour of several sites identified in the Kendrick Class III survey. Mr. Gorden went to Sundance, Wyoming to meet with representatives from Crook County. A summary of that meeting is provided in Enclosure 2. The rest of the NRC and SC&A staff met with Strata and its contractor, WWC, with Mr. Gorden joining these meetings in the afternoon after the meeting with Crook County representatives. A summary of those two discussions is provided below.

Historic and Cultural Resources – Mrs. Jessie Muir Quintero, Mrs. Jean Trefethen, Dr. Paul Nickens, Mrs. Sarah Stokely, Mr. Richard Currit, Mr. Ben Schiffer, and Mr. David Ferguson. Discussions involved continuation of the topics related to the overlap of cultural sites between Kendrick and Ross and a potential path forward for Kendrick tribal involvement. Mr. Ferguson, archaeological contractor for Strata joined the discussions on this day. To address tribal involvement, it was decided to compile a list and site form package for previously recorded archaeological sites to forward to the consulting Tribes and to arrange for a site visit later in the summer to discuss these sites with tribal representatives. The list includes three sites previously identified in the Kendrick Testing Plan as needing Tribal consultation for the NRHP evaluation. As part of the Tribal involvement discussion, Mr. Knode brought up the need to inform and involve the Kendrick landowners of the cultural resources activities occurring on their land. This may be addressed in the form of an informational meeting for the landowners, possibly in conjunction with the proposed visit to the project area by tribal representatives later this summer.

Following these discussions, Mr. Ferguson and Mr. Schiffer led a field trip to visit five presently unevaluated archaeological sites, two of which overlap the boundary line between Kendrick and Ross. The sites visited included 48CK2087, 2089, 2261, 2262, and 2270.

Soil, Geology, and Water Resources: Dr. Zeitoun, Ms. Walker, Mr. Griffin, and Mr. Moores discussed soil, geology, surface water, and ground water characteristics of Ross and Kendrick as described in the Environmental and Technical Reports. The issues covered included the following:

- soil erosion;
- faults, fractures, and induced seismicity;
- use of mud pits and impact on surrounding soil;
- identification of well and borehole locations and borehole abandonment;
- surface water contaminant sources;
- flood inundation analysis;
- Wyoming Pollutant Discharge Elimination System (WYPDES) and surface water effluent monitoring;
- use of surface water and nonproduction ground water
- aquifer tests;
- ground water consumptive use;
- ground water modeling and related elements; and
- ground water geochemistry and well classification.

The results of the discussions helped resolve Information Needs related to flood recurrence intervals, depth to water table, and thickness of soil horizons above bedrock. At the end of this meeting, Mr. Griffin and Mr. Gorden held a teleconference with WWC Engineering to clarify a few potential RAIs regarding waste management, air quality, and ecology issues.

On **Thursday, April 21, 2016**, Strata took the remaining participants on a general site tour of the Ross mine units and the proposed Kendrick project site. Construction and operational phases of Ross Mine Unit 1 were examined, including well swabbing (to sample the deep monitoring interval), module building (header house) piping and instrumentation, general well layout, mudpit status, and other mine unit features. Additionally, the group traveled to monitor well clusters 43-24 and 21-11 to observe their general location and layout, as well as surface water sample location P19820S. The group also viewed WYPDES outfall under permit WY0095095 associated with the Hahn Federal 24-27 oil production treatment unit (T53N R68W Sec 26 SW NW), as well as an air monitor station. Several stream beds and other surface water sample locations were examined, and the Mellot #2 and Mellot #3 enhanced oil recovery (EOR) well locations (associated with active oil wells at the same sites) were visited, although the actual EOR wells were not observed.

During the tour of the Kendrick site with the Strata staff, NRC and SC&A personnel noted that most of the operational area of the site is grassland with flat to gently rolling hill topography. The Strata staff stated that the land and mineral rights within the project boundary are all privately owned. Strata described the land use within the area as predominately agricultural and livestock grazing, with additional activity from oil and gas and coal bed mining operations. Strata discussed a new phased approach was being developed for the wellfields because of the current price of uranium. Also, because onsite yellowcake production has not yet started at Ross, one truck shipment of resin is shipped offsite weekly for conversion. Capacity at the currently constructed Ross facility would generate enough resin to require up to two truck shipments per week. Additional construction that would expand the facility and introduce yellowcake production to the licensed capacity is contingent upon market conditions. During the close-out meeting, the NRC team informed Strata that the topics of discussion that were not fully clarified, or that require official responses, will be included in RAIs to Strata. In the meantime, Strata will continue to provide documentation requested through the Information

Needs ahead of the issuance of the RAIs. Strata provided the NRC with the following documentation:

- “Memorandum of Understanding for Improvement and Maintenance of Crook County Roads Providing Access to the Ross ISR Project”;
- Maps of the proposed Barber Expansion Area;
- “Ross ISR Baseline Light Pollution and Reporting,” dated March 26, 2015, and April 5, 2016;
- Ross air quality permit application and permit;
- Ross ISR Project, Mine Unit 1 Wellfield Data Package, including Attachments 1-13, July 2015. Strata Energy Inc., Ross ISR Project, Revisions to the Mine Unit 1 Wellfield Data Package, March 25, 2016;
- U.S. Nuclear Regulatory Commission Verification of Strata’s Response to License Condition 12.7, Ross In-Situ Recovery (ISR) Project, Crook County, WY, Source Material License SUA-1601, Docket No. 040-09091, TAC J00735, November 19, 2015;
- Ross Mine Unit #2 WYPDES Discharge Permit # WYG720375, authorization to Discharge Wastewater Associated with Ground Water Well Pump Testing and Development, February 3, 2016;
- “Technical Report on Technologically Enhanced Naturally Occurring Radioactive Materials from Uranium Mining,” Volume 1, “Mining and Reclamation Background,” U.S. Environmental Protection Agency, Office of Radiation and Indoor Air Radiation Protection Division (6608J), previously published online and printed as Volume 1 of EPA 402-R-05-007, January 2006; updated June 2007 and printed April 2008 as EPA 402-R-08-005;
- “Technical Report on Technologically Enhanced Naturally Occurring Radioactive Materials from Uranium Mining,” Volume 2, “Investigation of Potential Health, Geographic, and Environmental Issues of Abandoned Uranium Mines,” U.S. Environmental Protection Agency, Office of Radiation and Indoor Air Radiation Protection Division (6608J), published online as Volume 2 of EPA 402-R-05-007, August 2007, updated and printed April 2008 as EPA 402-R-08-005; and
- Request to Amend License Condition 11.3, Source Materials License SUA-1601, Docket No. 040-09091, July 15, 2015.

**Meeting Between Representatives from Crook County, Wyoming, and SC&A
Regarding the Development of a Supplement Environmental Impact Statement
for the Kendrick Expansion Area**

Date: April 20, 2016

Attendees

Milton Gorden, SC&A
Steve Stahla, County Commissioner
Joe Baron, County Attorney
Tim Lyons, Administrator, Crook County Growth and Development
Mary Kuhl, County Treasurer
Linda Fritz, County Clerk
Melanie Wilmer, Emergency Management Coordinator
Morgan Ellsbury, Department of Road and Bridge

Summary

Mr. Gorden met with Crook County officials to obtain information in support of the development of the draft Supplemental Environmental Impact Statement (SEIS) for the Kendrick Expansion Area, which is located adjacent to the Ross project, operated by Strata. Strata has applied for a license amendment to expand uranium mining to the Kendrick area, and the U.S. Nuclear Regulatory Commission (NRC) determined that an SEIS would be required to satisfy the requirements of the National Environmental Policy Act.

The information obtained from Crook County officials will assist in describing the affected environment associated with Kendrick and determining the impacts related to this facility. Meeting participants discussed emergency management, transportation, business development, and socioeconomic influences in the county.

SC&A and the county discussed the emergency management resources available to respond to emergencies at Ross and Kendrick, and the training provided by Strata regarding the hazards associated with operations. The Ross and Kendrick sites are located in county fire zone 25. County emergency response personnel from Hulett, Moorcroft, and Carlile would possibly respond to an emergency at the Ross and Kendrick sites. Responding emergency medical technicians have the authority to call in Life Flight helicopter services from Rapid City and Casper. The possibility of wildfires was discussed, as well as the resources available to respond to a wildfire. The county has submitted a grant to the State for construction of a fire hall to be located within a mile of Ross and Kendrick. Currently, firefighting equipment is located at various ranches near Ross and Kendrick, and the construction of a fire hall would consolidate the equipment to one place. The fire hall is to be constructed just south of the junction

of D Road and New Haven Road, on the property associated with the nearest residence just to the southeast of the Kendrick border.

Regarding transportation, Mr. Baron provided the most recent version of the Memorandum of Understanding (MOU) between the county and Strata regarding the maintenance of roads surrounding, and within, Ross and Kendrick and other mitigation measures that would minimize transportation accidents and dust generation. SC&A and the county discussed the state of D Road and efforts to obtain a State grant to improve the road. If a grant was obtained and the county could provide in-kind funding, then it was most likely that D Road would be regraded with new gravel. SC&A and the county discussed the MOU in terms of the responsibilities it outlines (primarily dust control measures). Mr. Ellsbury provided average daily traffic counts the county performed for D Road and Cabin Creek Road, as shown in the following table.

Location	Traffic Count (average daily traffic)	Date
Cabin Creek	109	8/3/2009
Cabin Creek	91	10/31/2014
D Road	357	8/11/2009
D Road	379	10/31/2014

In terms of business development, the county stated that it did not anticipate any new industrial projects or other developments, and there were no changes for land use in the county. Although the bentonite mines in the county are still permitted, they are inactive. The proposed rare element mine, to be operated by Rare Element Resources and to be located near Sundance, Wyoming, is on hold indefinitely. The county stated that Crook County was considered a 'bedroom community' and that many residents commuted to other locations, such as Gillette, for work.

Regarding socioeconomics, Ms. Kuhl provided Mr. Gorden with information regarding the taxes and levies to be paid by Strata, and the formula for computing levies based on production rates at Ross and Kendrick. Ms. Kuhl also provided information (see Attachment 1) on how these funds are distributed among the county departments. The county also provided the number of registered voters (58) in the Oshoto community and a map showing residence locations in the Oshoto community (see Attachment 2).

The county requested SC&A to ask Strata to provide it with a breakdown of where Strata employees live (Strata subsequently agreed to do so). The county indicated that Strata sponsored an annual 4-year scholarship to a Crook County student to pursue a technical degree, which was later confirmed with Strata. The county encouraged SC&A, as the NRC contractor, to communicate with the State Game Warden (John Davis) regarding wildlife issues. SC&A will pursue this recommended followup. The county also stated that the Moorcroft Landfill was the nearest landfill and would be

available for at least a couple more years. The town of Moorcroft was pursuing making the landfill a regional facility. SC&A informed the county that Strata has an office in Sundance. Strata later indicated that it will contact the county with the office location.

Mr. Lyons requested that the county be put on distribution for the announcement of the publication of the draft Kendrick SEIS for public comment. SC&A responded that the NRC project manager will be informed of the request. The draft SEIS is currently scheduled to be issued in November 2016.

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LEVY DISTRIBUTION INQUIRY

Page # 1

tax distribution

Levy Year	Levy District	Levy Code	Fund	Fund Description	Percent of Total	Fund Amount
2015	0100	6 MILL COSCHOOL	510	6 MILL SCHOOL	9.75 %	\$ 9.75
		BOCES 1/2 1/2 MILL	550	BOCES 1/2 MILL	0.81 %	\$ 0.81
		CCMSD	380	MEDICAL SERVICES	4.88 %	\$ 4.88
		CO FAIR	320	COUNTY FAIR	1.09 %	\$ 1.09
		CO GENER	100	COUNTY GENERAL	14.85 %	\$ 14.85
		CO LIB	310	COUNTY LIBRARY	3.57 %	\$ 3.57
		CO MUSEM	330	COUNTY MUSEUM	1.63 %	\$ 1.63
		LEAFY S	350	W & P SPECIAL MANAGEMENT	1.63 %	\$ 1.63
		SCDIST 1 OPERATIN	500	SCHOOL DISTRICT	40.65 %	\$ 40.65
		ST SCHCO 12 MILL	400	STATE SCHOOL	19.51 %	\$ 19.51
		W & P	340	WEED & PEST	1.63 %	\$ 1.63
				SUBTOT		\$ 100.00

FUND SUMMARY

FUND	FUND DESCRIPTION	FUND AMOUNT
100	COUNTY GENERAL	\$ 14.05
310	COUNTY LIBRARY	\$ 3.57
320	COUNTY FAIR	\$ 1.09
330	COUNTY MUSEUM	\$ 1.63
340	WEED & PEST	\$ 1.63
350	W & P SPECIAL MANAGEMENT	\$ 1.63
380	MEDICAL SERVICES	\$ 4.88
400	STATE SCHOOL	\$ 19.51
500	SCHOOL DISTRICT	\$ 40.65
510	6 HILL SCHOOL	\$ 9.75
550	BOCES 1/2 HILL	\$ 0.81
		\$ 100.00

04/20/2016
11:13 AM

LEVY DISTRIBUTION INQUIRY

Page # 3

KIND SUMMARY

KIND	KIND DESCRIPTION	KIND AMOUNT
COUNTY	COUNTY	\$ 21.14
OTHER	OTHER	\$ 8.14
SCHOOL	SCHOOL	\$ 51.21
STATE	STATE <i>School</i>	\$ 19.51
		\$ 100.00

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Host: TRS1A-PC / CROOKCSA2
User: maryk

T0/T0M0 - Parcel Master Inquiry

File Edit Navigate Action Tables Reports Options Help

Tax Year: 2015 Parcel: GEO Code:

Main Selection: Parcel Information Ownership Legal Description Valuation Misc Code Attachments User Defined Fields Billing/Payment History

Selection Criteria: ☐ Main ☐ Code ☐ Address ☐ Legal ☐ Other

Unit Status: Tax Type: Levy District: Name: Strata CCI Account: Unit Parcel: Band Code:

Clear Selection Advanced Search Limit: 0

Tax Year	Parcel#	CCI Account#	Tax Type	Assessment Status	Billing Status	Levy Dist	Sub	Legal Name
2015	0000P0012836	R0012836	RE	Active	Paid	0100		STRATA ENERGY
2015	0000R0011088	R0011088	RE	Active	Paid	0100		STRATA ENERGY
2015	0000R0012953	R0012953	RE	Active	Paid	0100		STRATA ENERGY INC

LOCATION# 1:
GEO: 18-0100-06-0-01-00079
LEVY DIST: 0100 COUNTRY CROOK COUNTY

FREE FORM LEGAL:
STRATA ENERGY PERSONAL PROPERTY
on equipment

Sort by: ☒ DB Default ☐ Tax Year ☐ Parcel# ☐ GEO Code ☐ Tax Type ☐ Levy District ☐ Name

tax-wise

0000P0012836 STRATA ENERGY (Levy District: 0100)

Enter data or press ESC to end

Print at: Wednesday, April 20, 2016 11:21:19 AM
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 User: maryk

CD/TPSP - Parcel Master Inquiry

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Tax Year: 2015 Parcel#: 0000P0012836 GED Code: - ACTIVE

Main Selection: Parcel Information Ownership Legal Description Valuation Misc Code Attachments User Defined Field Billing/Payment History

Selected Year Valuation Information

Lot	Val Class Cd	Market Value	Taxable Value	Taxes
1	0004000	147,480	16,960	1,043.04

Class Code: 0000 (Residential Single-Family) ☐ Default Value
 Location: 18 0100 06 0-21-00079 0100
 Calculation:

Market Value: 147,480
 (Recalc Taxable): OFF
 Taxable Value: 16,960
 Mill: 61.50000
 Taxes: 1,043.04

147,480 16,960 1,043.04
total value

Historical Valuation Information

Year	Market Value	Taxable Value	Total Dvlt	Net Exempt
2015	147,480	16,960	0.000	0
2014	145,671	16,775	0.000	0
2013	88,818	10,214	0.000	0
2012	54,062	6,309	0.000	0

Comments:

Quantity: 0.000 Val Exempt: 0

Updated by: CCL/T/LER 08/25/2015 10:50 AM

0000P0012836 STRATA ENERGY (Levy District: 0100)

Print at: Wednesday, April 20, 2016 11:14:15 AM
Host: TRS1A-PC / CROOKCSA2
User: maryk

QD/DPMP - Parcel Master Inquiry

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Tax Year: 2015 Parcel#: 0000P0012836 GED Code: ACTIVE

Main Selection: Parcel Information Ownership Legal Description Valuation Misc Code Assignments User Defined Fields Billing/Payment History

Billing Information						
Tax Year	Simi	Billing Date	Description	1st Amount	2nd Amount	Total Tax Billed
2015	6654	09/02/15	TOTAL	521.52 P	521.52 P	1,043.04
2014	6642	09/23/14	TOTAL	515.83 P	515.83 P	1,031.66
2013	6620	09/05/13	TOTAL	314.08 P	314.08 P	628.16
2012	6483	09/01/12	TOTAL	194.00 P	194.00 P	388.00

paid

Pay Type	Trans Date	Total Payment	Tax Amount	Interest Paid	Per
P2	11/25/15	1,043.04	1,043.04	0.00	

Current Payment Info:

#1 Check: 5817
Strata Energy Inc
Amount: 3,134.24

Payment Made By:

Strata Energy Inc

Additional Payment Info:

Parcel#: 0000P0012836
Batch#: 20151125-000047
Receipt#: 5185
Pay Desc: Both Halves Tax Payment
Pay Date: 11/25/2015

Total Due \$*****0.00 (Does NOT include Penalty, Interest, or Fees)

0000P0012836 STRATA ENERGY (Law District 0100)

Enter data or press ESC to end

Print at: Wednesday, April 20, 2016 11:14:29 AM
Host: TRS1A-PC / CROOKCSA2
User: maryk

Parcel Master Inquiry

File Edit Navigate Action Tables Reports Options Help

Tax Year: 2015 Parcel# GEO Code

Main Selection: Parcel# Information Ownership Legal Description Valuation Misc Code Attachments User Defined Fields Billing/Payment History

Selection Criteria: Name Strata CCI Account#
Tax Type
Levy District
Unit Parcel#
Bank Code

Clear Selection
Advanced Search
Limit: 0

Tax Year	Parcel#	CCI Account#	Tax Type	Status	Billing Status	Levy Dist	Sub	Legal Name
2015	0000P0012836	P0012836	PP	Active	Paid	0100		STRATA ENERGY
2015	0000R0011089	R0011089	RE	Active	Paid	0100		STRATA ENERGY
2015	0000R0012953	R0012953	RE	Active	Paid	0100		STRATA ENERGY INC

LOCATION# 10:
GEO: 18-5368-25-4-00-00100
LEVY DIST: 0100 COUNTRY CROOK COUNTY

PROPERTY ADDRESS:
1825 D RD
MOORCROFT, 000000000

FREE FORM LEGAL:
T 53N R 65W SEC 25 N SE (PORTION OF) LOT 4 (PORTION OF) LOT 5 (PORTION OF) TOTAL ACRES: 35.02
1970 RANCH STYLE HOUSE 1084 SQ FT W/
FULL BASEMENT MASONRY GARAGE 22' X 30'
MASONRY STOOP 5' X 7' 1946 BARN 18' X
24' 1970 120 LNFT CORRALS (NOT ASSESSED) 1978 180 LNFT CORRALS (NOT ASSESSED) 1970 POLE BLDG 24' X 60'

tax-wise

0000R0011089 STRATA ENERGY (Levy District: 0100)

Enter data or press ESC to end

Print at: Wednesday, April 20, 2016 11:14:34 AM
 Host: TRS1A-PC / CROOKCSA2
 User: maryk

TRS1A-PC - Parcel Master Inquiry

File Edit Database Action Tables Reports Options Help

Tax Year: 2015 Parcel#: 0000R0011089 GEO Code: ACTIVE

Main Selection | Parcel Information | Ownership | Legal Description | Valuation | Misc Code | Attachments | User Defined Fields | Billing/Payment History

Billing Information							Payment Information					
Tax Year	Billing Stmt #	Billing Date	Description	1st Amount	2nd Amount	Total Tax Billed	Pgt. Type	Tax Date	Total Payment	Tax Amount	Interest Paid	Per
2015	6655	09/02/15	TOTAL	662.00 P	662.00 P	1,324.00	P2	11/25/15	1,324.00	1,324.00	00	
2014	6643	09/23/14	TOTAL	688.74 P	688.74 P	1,377.48						
2013	6621	09/05/13	TOTAL	687.51 P	687.51 P	1,375.02						
2012	2617	09/01/12	TOTAL	420.66 P	420.66 P	841.32						
2011	2075	09/12/11	TOTAL	345.84 P	345.84 P	691.68						
2010	971	09/30/10	TOTAL	461.43 P	461.43 P	922.86						
2009	7394	09/01/09	TOTAL	477.70 P	477.70 P	955.40						
2008	7326	09/17/08	TOTAL	520.72 P	520.72 P	1,041.44						

Current Payment Info:

Check: 5317
 State Energy Inc
 Amount: 3,134.24

Payment Made By:
 State Energy Inc

Additional Payment Info:
 Parcel#: 0000R0011089
 Batch#: 20151125-000047
 Receipt#: 5186
 Pay Desc: Both Halves Tax Payment
 Pay Date: 11/25/2015

Total Due \$*****0.00 (Does NOT include Penalty, Interest, or Fees)

0000R0011089 STRATA ENERGY (Levy District 0100)

Enter data or press ESC to end

Print at: Wednesday, April 20, 2016 11:14:43 AM
Host: TRS1A-PC / CROOKCSA2
User: maryk

TD/DPMP - Parcel Master Inquiry

File Edit Navigate Action Tables Reports Options Settings Help

Tax Year: 2015 Parcel#: GEO Code:

Main Selection: Parcel# Information Ownership Legal Description Valuation Misc Code Attachments User Defined Fields Billing/Payment History

Selection Criteria: ☒ Main ☐ Codes ☐ Address ☐ Legal ☐ Display

Unit Status: Tax Type: Levy District: Name: Strata Mkt Parcel#: Bldg Code:

CCI Account#: Clear Selection Advanced Search Limit: 0

Tax Year	Parcel#	CCI Account#	Tax Type	Assessment Status	Billing Status	Levy Dist	Sub	Legal Name
2015	0000P0012836	P0012836	PP	Active	Paid	0100		STRATA ENERGY
2015	0000R0011089	R0011089	RE	Active	Paid	0100		STRATA ENERGY
2015	0000R0012953	R0012953	RE	Active	Paid	0100		STRATA ENERGY INC

LOCATION# 1:
GEO: 18-5367-17-3-00-03700
LEVY DIST: 0100 COUNTRY CROOK COUNTY

PROPERTY ADDRESS:
1029 NEW HAVEN RD
DASHOTO, 000000000

FREE FORM LEGAL:
T 53N R 67W SEC 17 W SW; SEC 18
NE NESE TOTAL ACRES: 280.00 OIL
WELL LOCATION: SEC 17 SWSW TOTAL OIL
EXEMPTION: 40.00 ACRES

Sort by: ☒ D3 Default ☐ Tax Year ☐ Parcel# ☐ GEO Code ☐ Tax Type ☐ Levy District ☐ Name

0000R0012953 STRATA ENERGY INC (Levy District: 0100)

tax-wise

Enter data or press ESC to end

Print at: Wednesday, April 20, 2016 11:14:47 AM
Host: TRS1A-PC / CROOKCSA2
User: maryk

TD/DPSP - Parcel Master Inquiry

File Edit Viewable Action Tables Reports Options Help

Tax Year: 2015 Parcel#: 0000R0012953 GEO Code: * * * * *

ACTIVE

Main Selection: Parcel Information Ownership Legal Description Valuation Misc Code Attachments User Defined Fields Billing/Payment History

Billing Information						Payment Information						
Tax Year	Serial #	Billing Date	Description	Tax Amount	End Amount	Total Tax Silled	Pay Type	Pay Date	Total Payment	Tax Amount	Interest Paid	Per
2015	6656	09/02/15	TOTAL	49.39 P	49.39 P	93.78	P3	11/25/15	93.78	93.78	00	
2014	6644	09/23/14	TOTAL	48.06 P	48.06 P	96.12						
2013	6622	09/05/13	TOTAL	46.28 P	46.28 P	92.56						

Current Payment Info:

#1 Check: 5817
State Energy Inc
Amount: 3,134.34

Payment Made By:

State Energy Inc

Additional Payment Info:

Parcel#: 0000R0012953
Batch#: 2015123-000047
Receipt#: 5187
Pay Desc: Both Halves Tax Payment
Pay Date: 11/25/2015

Total Due \$*****0.00 (Does NOT include Penalties, Interest, or Fees)

0000R0012953 - STRATA ENERGY INC (Levy District: 0100)

Enter data or press ESC to end

Tax Calculation Formula

4-20-2016

Mineral Product Tax:

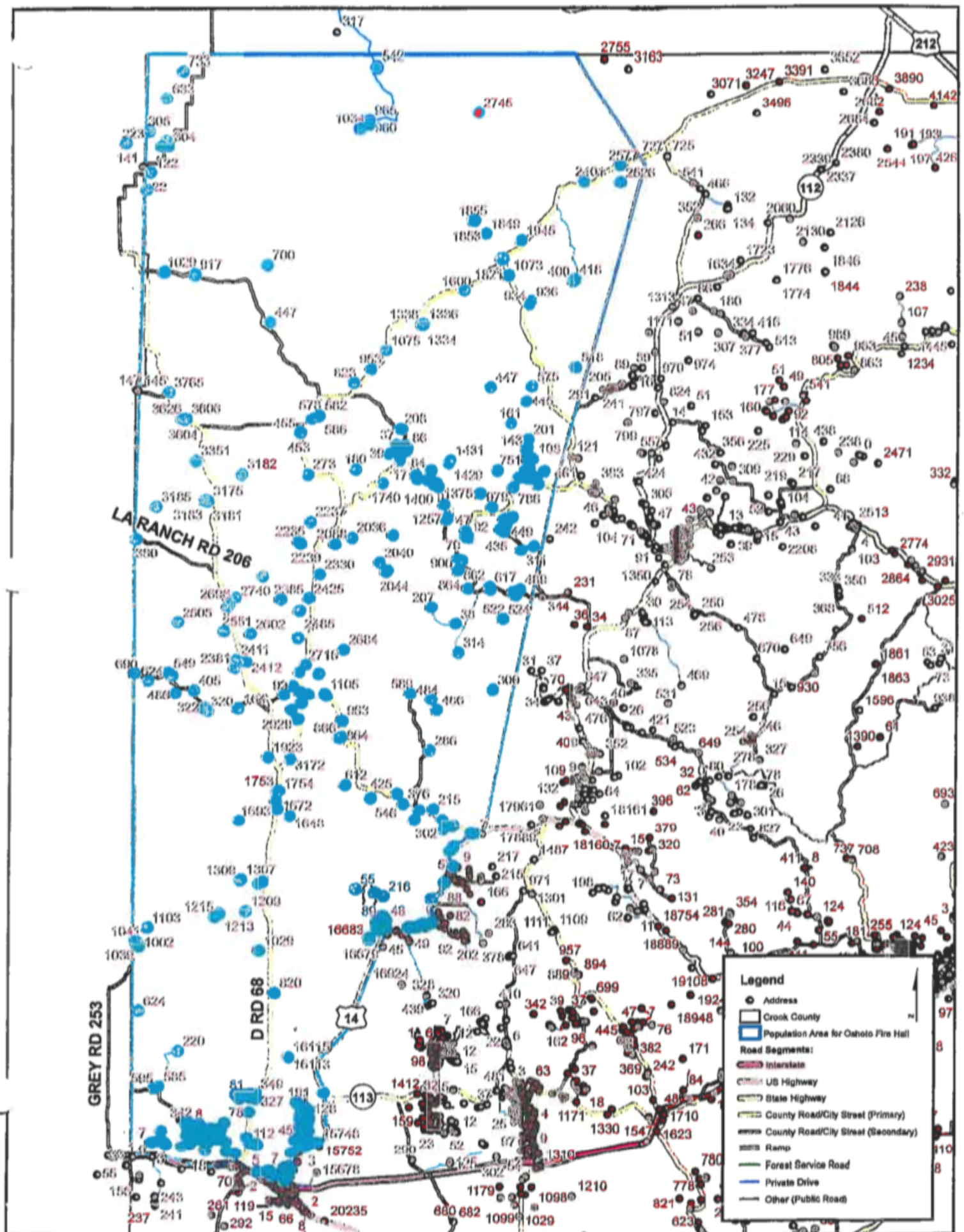
$$\text{Value} \times 100\% = \text{Valuation} \quad / \quad \text{Valuation} \times \text{mil levy} .0615 = \text{Tax Amount}$$

$$\text{Example } 100,000.00 \times 100\% = 100,000.00 \quad 100,000.00 \times .0615 = 6,150.00$$

Personal Property Tax: (Equipment) Industrial

$$\text{Value} \times 11.5\% = \text{Valuation} \quad / \quad \text{Valuation} \times \text{mil levy} .0615 = \text{Tax Amount}$$

$$\text{Example } 147,480 \times 11.5\% = 16,960 \quad 16,960 \times .0615 = 1,043.04$$



INFORMATION NEEDS

KENDRICK ENVIRONMENTAL REVIEW SITE VISIT

The purpose of the following Information Needs is to clarify information and data necessary for the U.S. Nuclear Regulatory Commission (NRC) to fulfill its responsibilities under the National Environmental Policy Act of 1969. These Information Needs were developed during the NRC staff's review of Strata Energy Inc.'s (Strata) *Environmental Report* (ER) and *Technical Report* (TR), which were submitted to the NRC as part of its license amendment application for the Kendrick expansion area.

Please have available the necessary personnel during the NRC staff's site visit to discuss the following Information Needs.

GENERAL

GEN-1 Site Tour

Provide a general tour of the Kendrick site, including the Ross site.

GEN-2 Preconstruction Activities

On September 15, 2011, the NRC published a final rule in the *Federal Register* (76 FR 56951) to clarify the definitions of commencement of construction and construction with respect to materials licensing actions conducted under the NRC's regulations. This final rule was effective on November 14, 2011. The parts of the final rule that are applicable to the NRC's licensing action for the proposed Kendrick ISR project are in Title 10 of the *Code of Federal Regulations* (10 CFR) 51.45, which specifies that an ER must include a description of site preparation activities, a description of the impacts of those activities and an analysis of the cumulative impacts of those activities. The site preparation activities are separate from the analysis of the construction activities should the amendment be approved.

The NRC's regulations in 10 CFR 51.45(c) specify what the analyses in an ER must include with regard to the proposed action and site preparation activities.

- A. Clarify the description of those Kendrick site preparation (or preconstruction) activities excluded from the definition of construction (i.e., a description separate from that of the description of the proposed construction activities) that have been or will be undertaken, regardless of when those activities may occur in relation to the potential issuance by the NRC of the amendment to the license to construct and operate the proposed ISR facility;
- B. Provide a description of the environmental impacts from the site preparation activities (also including a description of any proposed measures to avoid or reduce adverse effects of the impacts); and

- C. Provide an analysis of the cumulative impacts of the proposed action (i.e., the incremental impact of the proposed action) on the human environment when added to the impacts of such excluded site preparation activities and to the impacts of other past, present, and reasonably foreseeable future actions (regardless of what agency (Federal or non-Federal) or person undertakes such other actions (see 40 CFR 1508.7, “Cumulative Impact”).

GEN-3 Cumulative Impacts

The Kendrick ER mostly references the cumulative impacts analysis in the Ross SEIS. The estimated acreage of the Kendrick project area and duration of the project period for the entire Lance District in the Ross ER and Ross SEIS differ from that in the Kendrick amendment. To facilitate the staff’s update of the cumulative impacts analysis, provide more information about the current plans for the region:

- A. Update the information provided on potential development in the Lance District with more detail. This should include the potential schedule, staffing (number, and whether new or existing workers), and disturbed acreage for Barber; the approximate location of the processing facility; and an evaluation of how the schedule overlaps with Ross and Kendrick (if this is not already accounted for in Kendrick ER Figure 2.3-2 as Barber is now the only other “Potential Future Production within the Lance District”).
- B. Indicate the reason that Richards is no longer being considered as an expansion area, such as technical reasons for unsuitability or that it is being combined with Barber. A comparison of Kendrick ER Figure 2.3-1 and Ross SEIS Figure 2.2 seems to indicate that Barber may include Richards, as well as some area to the north and west of Kendrick not previously considered in the Ross SEIS. Clarify the extent of potential future development in the Lance District.
- C. Kendrick ER Section 2.3.2.2.2 states that Strata is not aware of any major expansions or new coal mines proposed within 50 miles of Kendrick. Similarly, Kendrick ER Section 2.3.2.2.3 states that Strata is not aware of any plans for future oil and gas production activities near Kendrick. However, the ER does not identify any agencies contacted or the research done to draw these conclusions. Clarify the justification for these conclusions.

GEN-4 Permit Updates

Kendrick ER Table 1.5-1 identifies necessary environmental approvals and status of each with corresponding Federal and State agencies. These approvals are needed before operations can commence.

Following the submission of the license application to the NRC, Strata has continued to prepare, submit, and receive approval on these permits. Thus, ER Table 1.5-1 should be updated with the current status of proposed, pending, and approved licenses and

permits for Kendrick. Table 1.5-1 also provides a record of publicly available information that may assist in the development of the SEIS. This information would support the NRC's environmental impact analysis as required by 10 CFR Part 51.

GEN-5 Vanadium

The Ross application and SEIS describe both uranium and vanadium processing taking place at the CPP. However, the Kendrick application does not mention vanadium, although it states that the process for Kendrick would be the same as that licensed for Ross. Clarify whether vanadium would also be removed from the Kendrick resin or whether this is a change from the Ross SEIS. If vanadium stripping and processing will also take place with Kendrick resin, indicate the associated extension of time the CPP would be in operation to handle this from Kendrick.

GEN-6 Current Ross Activities

The Kendrick ER indicates that the pregnant lixiviant will be piped to the CPP, where it will go through the ion exchange process resulting in loaded resin, which will then be further processed at the Ross CPP into yellowcake before being shipped to a uranium conversion facility. However, it is the NRC's understanding that the Ross CPP is currently not operational for processing to yellowcake and that the loaded resin resulting from Ross operations is going to another site. Provide the current schedule for the CPP to become fully operational and indicate whether Strata plans to have the resin generated from activities at Kendrick processed to yellowcake at the Ross CPP or whether it will also be shipped off site. Describe where the resin is currently being shipped and details related to the transportation of that resin (e.g., frequency, size). This information is needed to establish the scope of activities and analyze impacts.

GEN-7 Mine Unit Overlap

Kendrick ER Figure 2.1-1 depicts the Kendrick mine units. Several of the units appear to overlap into Ross:

- A. One of the units overlaps into the south central part of Ross. Based on this figure, it does not appear to be one of the lettered mine units identified for Kendrick. Confirm that this mine unit is covered in the Kendrick application (e.g., in terms of impacted acreage, schedule) and identify the mine unit that includes it.
- B. A second mine unit overlaps into the northeastern part of Ross. Confirm that this is part of Mine Unit B, as appears to be indicated in Kendrick ER Figure 2.1-1.
- C. The perimeter monitor well ring for a wellfield in Mine Unit D also appears to overlap into the southeastern portion of Kendrick. Indicate whether the impacts (e.g., disturbed acres) associated with the portion overlapping into Ross are covered in the Kendrick ER.

GEN-8 Impacts of Current Ross Operations

Operations at Ross commenced in December 2015. Now that several months of operations have occurred, Strata is likely accumulating data on actual operations. Because the Kendrick ER relies heavily on many of the assumptions made about Ross for the Ross SEIS, identify any changes in operational parameters that would indicate that one or more of the assumptions made in the Ross SEIS may have been underestimated and provide updated estimates. For example, the Ross SEIS provides assumptions for waste generation rates for various operations and waste types, which are assumed to remain the same during Kendrick operations. If actual operational data indicate that these assumed waste generation rates should be greater, then indicate new bounding waste generation rates.

GEN-9 Figures

Please make available the electronic files for the figures included in the Kendrick ER. For maps, include either the native CAD files or the shapefiles/layers for input into ArcGIS. In particular, provide the native CAD/shape files for ER Figures 2.1-1, 3.5-2, 3.5-3, and 4.4-1. Having the information electronically would enable the NRC to identify (highlight) certain elements of interest and look at overall spatial distributions of associations.

GEN-10 References

Please make available for review the following documents referenced in the Kendrick ER:

- Application for and WDEQ/Land Quality Division (LQD) Permit to Mine No. 802.
- Underground Injection Control Class III Permit and Aquifer Exemption.
- Wastewater Pond Construction Permit for the retention and sediment ponds.
- Ross WDEQ/LQD reclamation plan (including expected updates).
- Draft updates to the NRC-approved Restoration Action Plan provided in Ross TR Addendum 6.1-A.
- WDEQ Water Quality Division (WQD) Permit to Construct Public Water Supply System.
- WDEQ/WQD Permit to Construct Domestic Wastewater System.
- Standard Operating Procedures for mitigating potential impacts for leaks and spills (developed pursuant to LC 10.4 of SUA-1601).
- Application and permit for Wyoming State Engineer's Office Permit to Appropriate Groundwater for ISR Wellfield (Table 1.5-1 states that this is to be prepared).

- Effluent monitoring program required under LC 10.9.
- Stormwater Pollution Prevention Plan.
- Application for and WYPDES permit for surface discharge of excess permeate.
- Application for and WYPDES permit for stormwater (industrial/mining/construction) (Table 1.5-1 says that existing construction permit will be modified to include Kendrick, the industrial permit is to be prepared, and the temporary permit for discharge during well testing was approved).
- Application for and Air Quality Permit No. CT-12198.
- Wyoming Refining Air Permit 2006 (cited in Kendrick ER Table 3.6-15).
- Light Pollution Operational Monitoring Plan for Ross (Kendrick ER Section 5.9 states that Strata will conduct baseline monitoring for potential light pollution from Ross, then use the results to prepare a light pollution operational monitoring plan, which would be modified to include Kendrick).
- Eckerle, William and Sasha Taddie, 2014, Preliminary Geoarchaeological Assessment of Archaeological Site Burial Potential and Integrity at the Proposed Ross ISR Project Area near Oshoto Reservoir in the Headwaters of the Little Missouri River, Crook County, Wyoming. Report prepared for GCM Services and Strata Energy by Western GeoArch Research LLC.
- Inter-Mountain Laboratories (IML), 2014a, Meteorological Database, Hourly Meteorological Monitoring Data, Summarized in December 2014.
- IML, 2014b, Air Quality Monitoring Database, Hourly Particulate and Gaseous Monitoring Data, Summarized in December 2014.
- IML, 2010, Ross ISR Monitoring Plan, Updated November 13, 2010.
- IML, 2001, Black Thunder Mine SODAR database, August 28, 2000 to October 8, 2001.
- Dodge, H.W. Jr. and Spencer, C.W., 1980, Uranium Deposits in the Fox Hills Sandstone, Northeastern Wyoming and their Relationship to Deposition Environments, in Turner-Peterson, C.E., (ed.), Uranium in sedimentary rocks: Application of the facies concept to exploration (Short Course Notes): Rocky Mountain Section of Society of Economic Paleontologists and Mineralogists, p. 211.
- Hamilton, J.L., 1977, Hydrologic Information, Vicinity Proposed In-Situ Uranium Leaching Site, Oshoto, Wyoming. Unpublished report prepared for Nuclear Dynamics, August 30, 1977.
- Manera, P.A., 1978, Aquifer Analysis Area 10 Five Spot Test, Oshoto Reservoir, Crook County, Wyoming. Unpublished report prepared by Nuclear Dynamics, June 5, 1978. and 1977, Aquifer Analysis Near Oshoto Reservoir, Crook County,

Wyoming. Unpublished report prepared for Nuclear Dynamics, revised November 22, 1977.

- Neuzil, C.E. 1993, Low fluid pressure within the Pierre Shale: A transient response to erosion. *Water Resources Research*, 29, no. 7: 2007-2020.
- Whicker, R., P. Cartier, J. Cain, K. Milmine, M. Griffin, 2008, Radiological Site Characterizations: Gamma Surveys, Gamma/Ra-226 Correlations and Related Spatial Analysis Techniques. *Operational Radiation Safety, Health Physics*, Vol. 95, Supplement 5: S180-S189, November 2008.
- WSGS (Wyoming State Geological Survey), 2010, *The Origin of Uranium Deposits*, by Robert Gregory.
- Crook County 2014b, unpublished traffic counts on Crook County roads, provided to WWC Engineering in 2014.
- WYDOT (Wyoming Department of Transportation), 2015, unpublished traffic projections for I-90 at Moorcroft, provided to WWC Engineering in 2015.
- WYDOT (Wyoming Department of Transportation), 2014b, traffic counts on I-90, 2008 through 2013, provided to WWC Engineering in 2014.

LAND USE

LU-1 View of the Proposed Facility

In its responses to the RAIs for Ross, Strata provided Figure ER RAI GEN-1-1, which overlays the proposed activities for Ross over a map of the license area that also shows the land use categories. Provide a similar figure for Kendrick, showing the facilities present at the end of the construction phase overlaying the land use categories for the site (i.e., combine Figures 4.1-2 and 3.1-3). Alternatively, provide the native CAD or shapefiles/layers so that the NRC staff can do this.

LU-2 State-Owned Land

The Kendrick ER (e.g., Table 1.3-1) indicates that the proposed project will impact State-owned land. Provide the current use of the State-owned land and the arrangement Strata has with the State for accessing this land.

TRANSPORTATION

TR-1 Memorandum of Understanding

Kendrick ER Sections 4.2.1 and 4.2.1.1 refer to a memorandum of understanding with Crook County that includes details about proposed transportation mitigation measures. Provide a copy of this memorandum, including expected updates to cover Kendrick. Of

interest are details such as whether the care of county roads applies only to those within the project boundaries. This information will be used to establish the scope of mitigation measures to be identified in the transportation analysis.

TR-2 Use of Rail

Kendrick ER Figure 3.2-1 shows that the BNSF Railroad is located to the southwest of Kendrick. Confirm that rail is not expected to be used to support activities at Kendrick, or at Ross as a result of activities at Kendrick. This information will be used to ensure that the current scope of the transportation analysis is sufficient.

TR-3 Resin Shipments

If loaded resin generated at Ross from the pregnant lixiviant piped in from Kendrick will be shipped off site from the Ross CPP for processing into yellowcake, whether the entire period of operation or a portion of it, provide an estimate of the number of shipments of resins to and from the Ross CPP annually that would be associated with Kendrick activities. Identify the location to which the resin would be shipped and its distance from the Ross CPP.

GEOLOGY AND SOILS

GEO-1 Soil Survey

Kendrick ER Section 3.3.5.2 discusses the results of the Kendrick soil survey. Provide additional information based on Addendum 3.3-D to support the discussion on erosion (p. 3-50), better detailing, topographically, where the hazard for wind and water erosion is severe, as stated in ER Section 3.3.5.2, and whether this area is to be disturbed as part of the activities proposed for Kendrick.

GEO-2 Seismology

The discussion in Kendrick ER Section 3.3.6 on seismology and all seismic maps (except Figure 3.3-9) are confined to Wyoming. The ER also focuses on current seismologic events and does not address the occurrence of basement or deep faults, and whether these should be considered in conjunction with the approved Class I Deadwood well(s) that will be used for wastewater disposal.

- A. Ross TR Addendum 2.6-A is referenced for its analysis of faults. However, that analysis did not extend through the greater Kendrick area. As indicated in Buswell (1982), shallow faults may be present in the general area. Discuss in detail the possibility of localized shallow faulting. (Buswell, M.D., "Subsurface Geology of the Oshoto Uranium Deposit, Crook County, Wyoming: MS Thesis," South Dakota School of Mines and Technology, 1982.)

- B. Evaluate the potential for induced seismicity as a result of ISR extraction and brine disposal activities.

GEO-3 Land Application

Kendrick ER Table 4.13-1 indicates that excess permeate may be disposed by land application, among other methods, although this is not discussed elsewhere in the application. Clarify if land application will be used and identify the approvals that would be necessary and the status of obtaining those approvals.

GEO-4 Mud Pits

The Kendrick ER (e.g., Section 3.12, p. 3-514; Section 4.3.1.1.1, p. 4-27) refers to the use of mud pits for soil loss mitigation, stating that drill cuttings and drilling wastes are typically disposed on site in mud pits pursuant to U.S. Environmental Protection Agency (EPA) and state regulations. Provide or reference additional information pertaining to the retention of material in mud pits and potential impact on surface soils and surficial aquifers; specify if the management of mud/technologically enhanced naturally occurring radiological material (TENORM) at Kendrick would differ from its management at Ross as described in Ross SEIS Sections 2.1.1.4, 3.13.1, and 4.14.1.1.

GEO-5 Well Locations

Kendrick ER Figure 3.1-6 depicts oil and gas well locations in the vicinity of Kendrick. Other maps, including those in Addendum 3.4-I, also present well locations. However, EOR well location and well status posted on the current (2015) Wyoming Oil and Gas Conservation Commission (WOGCC) Web site do not directly correspond with these figures. For example, there appears to be some inconsistencies with injection well names or the location does not appear to be correct (when converting between latitude/longitude and easting/northing). Also, there are several more injection and disposal wells listed in the WOGCC database that are not in Addendum 3.4-I. The following table provides some examples of discrepancies between the ER and the WOGCC database.

Addendum 3.4-I Figure 15 Well Name	WOGCC Database Well Name	WOGCC Database Well API No.	Figure 15 Well Classification	WOGCC Database Well Class	Figure 15 Qtr- Qtr	WOGCC Database Qtr-Qtr
Kiehl Water Well #2	Kiehl Unit 2	49-011- 20292	Water Supply Well	Injection	NW SE	SE SW
WSW #1 West Kiehl Unit	West Kiehl Unit WSW 1	49-011- 09537	Water Supply Well	Water Supply	SW NE	NW NE
ENL Reynolds #6	Reynolds- Thompson 1-6	49-011- 20269	Water Supply Well	Water supply	On the border between SE and SW NW	SW NW
ENL Kiehl Water Well #1	no unit 1 in database; location same as Kiehl Unit 3	49-011- 20293	Water Supply Well	Oil Producing or injecting	SE SE	SE SE
Edsel WSW #2	Database does not have any wells in NW portion of Section 26		Water Supply Well		SE NW	
Lily WSW #1	Lily Fee 1	49-011- 21551	Water Supply Well	Injection	NE NE	NE NE
Brislawn Water Source Well #1	Edsel 8	49-011- 21148	Water Supply Well	Injection	NW NW	NW NW

Verify that the maps in Kendrick ER Figure 3.1-6 and Addendum 3.4-I presenting the location and status of injection and production wells in an around Kendrick are internally consistent and reflect the most current information available from the WOGCC and other sources. If the WOGCC data are inaccurate, clarify the inconsistencies.

GEO-6 Well Abandonment

Kendrick ER Section 3.1.9 states that “Prior to conducting tests for a wellfield data package, Strata will attempt to locate and abandon all historic drill holes within the perimeter monitor well ring for the wellfield in accordance with LC 10.12 of SUA-1601.” Clarify whether this activity will include the identification of all historic drill holes, such as for oil and gas, besides those made by Strata. If it does, indicate what steps Strata will take if it finds such a hole that has not been abandoned.

GEO-7 Paleontology

The Kendrick Class III Cultural Resource Inventory report (p. 4-2) indicates that an unspecified number of “traces” of paleontological material were observed during the September 2014 field effort. For the Ross Class III inventory (p. 4-2 of that report), such occurrences were recorded on “site forms or IF forms” and presumably mapped by GPS. Indicate whether similar field techniques were followed for paleontological occurrences at Kendrick. If they were not, provide justification for why paleontological localities within the Kendrick project area were not mapped and recorded. Also, specify the total number of such occurrences encountered during the inventory.

SURFACE WATER RESOURCES

SW-1 Other Potential Pollution Sources

As a supplement to Kendrick ER Section 3.4.1.8, provide a discussion of other potential pollution sources (e.g., agriculture, oil production, other mines) that may provide contaminant sources that discharge to surface water. If there are no sources other than the Wyoming Pollutant Discharge Elimination System (WYPDES) outfalls described in this section and the future WYPDES outfalls associated with the general construction temporary WYPDES permit, indicate so. The additional discussion should address, as applicable, past, current, and future pollutant sources with discharges to water, including locations relative to the site, the affected water bodies, and the magnitude and nature of the pollutant discharges, including spatial and temporal variations (i.e., rivers and reservoirs).

SW-2 Flooding

Kendrick ER Section 3.4.1.3 discusses the Hydrologic Modeling System (HEC-HMS) model that was developed to estimate the peaks and volumes of floods for various recurrence intervals within Kendrick.

- A. Section 3.4.1.3 does not specify these “various recurrence intervals.” They appear to be given in Addendum 3.4-A. To ensure the staff’s understanding, clarify the recurrence intervals referred to in Section 3.4.1.3.

- B. Specify whether the Revised Guidelines for Implementing Executive Order 11988, “Floodplain Management” (draft, 2015), were considered when calculating the flood peaks and volumes, taking into account climate change, and modify calculations as necessary to do so.

SW-3 Wyoming Pollutant Discharge Elimination System (WYPDES)

Kendrick ER Section 3.4.1.8, pages 3-80 to 3-81, presents summary information on WYPDES outfalls in the Kendrick area. Provide more specific details on expected discharges, including monitoring data for the temporary WYPDES outfalls and the expected flow volumes to outfalls and retention basins.

SW-4 Effluent Monitoring

Kendrick TR Section 3.1.3 states that License Condition (LC) 10.9 requires Strata to establish and conduct an effluent and environmental monitoring program, including surface water monitoring, in accordance with Ross TR Section 5.7.8.2. Provide more details on the effluent monitoring program as implemented at Kendrick (e.g., chemical, biological).

SW-5 Consumptive Use of Surface Water

The Kendrick ER does not directly address consumptive use of surface water. Indicate whether the information on surface water consumptive use in Ross SEIS Section 4.5 also applies to Kendrick. Provide the anticipated consumptive use rates of surface water specifically for Kendrick and the basis for the estimate, including, as applicable, potential impacts on the Oshoto Reservoir.

GROUND WATER RESOURCES

GW-1 Non-Production Water

Provide a table estimating the volumes of nonproduction ground water (e.g., water used for domestic consumption, dust control, and irrigation), recognizing that Addendum 3.4-J includes estimated flow rates for domestic/stock and EOR wells. A summary table presenting this information in one location is needed to clarify relative ground water use for Kendrick, and the data should be comprehensive with respect to consumptive use of nonproduction ground water.

GW-2 Aquifers

Provide additional details about the aquifers at Kendrick:

- A. Present additional information pertaining to the pre-EOR and general long-term water-level trends in the deep monitoring zone, ore zone, shallow monitoring

zone, and surficial aquifer, recognizing that pre-1980 potentiometric surface data for the ore zone is presented in Kendrick ER Addendum 3.4-I. For example, address whether there has been a declining water table, the origin of this event, and whether this affects surface water flow or the occurrence of seeps or springs.

- B. Provide a map of depth to water table for the surficial aquifer to assess the potential impact (from spills) to unconfined aquifer systems.
- C. As a supplement to Kendrick ER Section 3.4.3, provide a table summarizing the soil properties of the unsaturated zone necessary to estimate travel times to the water table.

GW-3 Aquifer Tests

Kendrick ER Addendum 3.4-G includes aquifer test results that deviate from their respective type curves (e.g., p. B-4, B-5, B-6). Provide comprehensive explanations for aquifer test type curve deviations.

GW-4 Abandoned Bore Holes

Kendrick ER Section 5.4.3.1.1 discusses the requirement to locate and abandon historical drill holes (LC 10.12) within the perimeter monitor well ring before conducting tests for the wellfield data package. Provide more extensive discussion on how the historical drill holes will be located as well as the potential future impact of wells that Strata was unable to abandon, taking into account Amendment 1 of SUA-1601, recent license amendment requests, and stakeholder concerns.

GW-5 Ground Water Consumptive Use

Ground water consumptive use is a critical component of the application. Provide additional information on the consumptive use of ground water, including the following:

- A. Kendrick TR Section 3.1.4 states that “Based on the production schedule, the model demonstrates that there is sufficient distance between the Ross and [Kendrick] wellfields that interference between Ross and [Kendrick] wellfields is not anticipated.” Provide modeling results for when the mines are in restoration with the greatest amount of consumptive use.
- B. Discuss the combined impacts of consumptive use on ground water availability from Kendrick, Ross, and other proposed ISR facilities in the Lance District.
- C. Kendrick TR Section 3.1.5 indicates that, as part of this license amendment application, Strata is not requesting an increase in the maximum instantaneous flow rate stated in LC 10.2 of SUA-1601. The expected restoration volumes are not covered under the license. Provide more information about historical and current consumptive use of groundwater and future anticipated consumptive use

rates, including the corresponding increase in consumptive use expected from Kendrick.

GW-6 Mitigation

The Kendrick ER relies on the ground water model for demonstrating the successful mitigation of excursions beyond perimeter monitoring wells. Discuss how the modeling results will be confirmed with field data.

GW-7 Ore Zone Potentiometric Surface

Kendrick ER Figure 3.4-28 shows the potentiometric surface of the ore zone. However, this figure is based on data from January 2015 and does not reflect the recently initiated ISR operations at Ross. Provide an updated figure.

GW-8 Geochemistry

Variation in the ground water quality of the Kendrick shallow monitoring aquifer is evident in Kendrick ER Table 3.4-33 and Addendum 3.4-J. Specifically, shallow monitoring aquifer ground water in the southwest portion of the project area appears to exhibit higher sulfate concentrations compared with the shallow monitoring aquifer ground water in northern areas, possibly due to the Fox Hills/Lance lithology variations. Water extracted from the ore zone aquifer exhibits a narrower compositional range variation, with only one well in the north showing higher sulfate. Explain the variations in shallow monitoring aquifer ground water composition.

GW-9 Current Ground Water Use

Kendrick ER Section 4.4.2.2.4 states that Strata “plans to work with the oil company to abandon the wells and replace them with an alternate well,” referring to existing oil production water wells that would be impacted by Kendrick operations. Provide documentation of any existing agreement or plan in place, including any implemented at Ross, which serves as the basis for the Kendrick approach.

GW-10 Well Classification

Kendrick ER Section 3.4.3.4.1.2 provides ground water well classifications. The calculations performed by Strata did not appear to take into account adjusted gross alpha activity (GAA) in accordance with the EPA Radionuclides Rule. Indicate whether GAA was considered and if not, why this adjustment was considered unnecessary. Alternatively, provide revised calculations taking GAA into account.

GW-11 Deep Monitoring Zone Monitoring

Kendrick ER Section 3.4.3.3, pages 3-100 to 3-102, concludes that the deep monitoring (DM) zone is not an aquifer due to lack of significant yield to support 200 animals (presumably cattle). Based on the presumed lack of yield, Kendrick TR Section 3.1.6,

pages 3-10 to 3-12, proposes a phased approach to DM monitoring based upon criteria including the thickness of the confining shale above the DM (i.e., BF1 or BF2), thickness of the DM, DM characteristics (i.e., permeability), and well performance (yield). Provide additional justification for the proposed monitoring criteria, including BF1/BF2 thickness criteria, minimum yield considering EPA's suggested limit of 1 gallon per minute, thickness cutoffs for the DM interval, determination of sufficient permeability, determination of air-lift yield cut offs, and conditions under which DM well spacing of less than one per 4 acres may occur.

Strata submitted a request to the NRC to amend License Condition 11.3 to reflect Strata's contention that the DM is typically not an aquifer. Based on data and operational experience obtained by Strata installing DM wells in Ross Mine Unit 1, Strata determined that it would be "difficult if not impossible to monitor [the DM] as required by License Condition 11.3." Provide an analysis of the impacts assuming that the NRC approves this amendment request, versus those if the request is not approved. The analysis should address how the reduced or lack of DM monitoring affects ground water and operations in comparison to the retention of DM monitoring as currently addressed in the Ross license.

TERRESTRIAL ECOLOGY

TER-1 Habitat Disturbance

Add to Kendrick ER Table 3.5-1 a column that indicates the number of acres expected to be disturbed for each habitat type, and a column that indicates the percentage of that habitat within Kendrick that would be disturbed. Include a statement with information about any assumptions about how disturbances were estimated. For example, indicate whether Strata assumed that only a small part of the wellfield extent would be disturbed (i.e., around the injection and extraction wells), or whether there is a larger assumed area. The NRC staff assumes that within the wellfield extent much of the area surrounding the injection and extraction wells would be undisturbed but possibly fragmented by construction access to drill the holes and buried pipelines feeding the injections and collecting the extraction fluid.

TER-2 Maintenance Practices

Provide specific details on operational and maintenance (O&M) practices that would take place during Kendrick activities that could affect biota. Kendrick ER Section 4.5.1.2 anticipates that O&M impacts would be less than construction impacts. Provide a statement of how much and what kind of project activity would typically occur within Kendrick during O&M to serve as the basis for a conclusion about potential impacts to biota. For example, would one vehicle travel and check wellfields each day?

AQUATIC ECOLOGY

AQ-1 Seeps/Springs

Kendrick ER Section 3.5.4.2.7 states that some perennial seeps/springs are present. However, the ER does not describe their link to the potentially impacted aquifer. There is no mention as to the importance of this habitat type to the aquatic setting.

- A. If these seeps/springs are linked to the potentially impacted aquifer, describe the potential impacts to aquatic resources that are present in them.
- B. Describe the maintenance practices to be implemented (if needed) for wetlands or springs/seeps.

METEOROLOGY, CLIMATOLOGY, AND AIR QUALITY

AIR-1 Kendrick-Specific Emissions Data

Kendrick ER Section 4.6 refers to the Ross air emissions analysis instead of performing one specifically for Kendrick. Ross SEIS Section 4.7.1.1 refers to the ISR Generic Environmental Impact Statement (NUREG-1910) and its analysis for the ISR facility in Crownpoint, NM, for assessing possible offsite concentrations of air pollutants. No concentrations at nearby residences are presented.

- A. Kendrick emissions are not quantified. Ross SEIS Table 4.4 provides emissions data by year. Provide similar data, especially for particulates, for the years in which Kendrick would be operating.
- B. No effluent concentrations are presented or compared to standards. Kendrick ER Section 4.6 cites the Ross data, and Ross SEIS Section 4.7 discusses potential pollutant concentrations. Clarify how the Kendrick emissions overlap with the Ross emissions.

AIR-2 Kendrick Air Permit Information

Provide the following related to the air permit application for Ross, as amended for Kendrick:

- A. Provide specifics on expected release points at Ross and Kendrick.
- B. Describe gaseous effluent control systems.
- C. Provide the models and assumptions used to determine concentrations, if included in the air permit application.

- D. Provide concentrations at points outside the site boundary, if included in the air permit application.

AIR-3 Particulate Emission Controls and Mitigation Measures

For drill rigs, identify the type of engines (i.e., Tier 1 or Tier 2) being used, and whether add-on controls such as catalyst and diesel particulate filters to achieve lower emission rates are being used. Use of these mitigation measures would reduce any EPA concerns related to impacts to 1-hour NO₂, PM_{2.5}, and PM₁₀, as well as hazardous air pollutants. For controlling visible dust plumes at the project site, describe the actions and timeframes for those actions if a visible plume is observed.

NOISE

NOI-1 Estimated Noise Levels

Kendrick ER Section 4.7.1.1.1 states that Table 4.7-1 shows the estimated noise levels for construction equipment 1,462 feet away (minimum distance from planned well and nearby residence). It states that “the table shows that the maximum estimated noise level at a nearby residence, resulting from a drill rig operating at the closest potential well location, would be well below the nuisance level of 55 dBA.” However, Table 4.7-1 shows that the drill rig would have the lowest noise level of all the construction equipment at a point 1,462 feet away, and all of the other equipment listed in the table would have a maximum noise level of 50 dBA or higher, with 9 of the 12 equipment types listed having a maximum noise level above the nuisance level of 55 dBA. Clarify the ER’s conclusion based on the data in the table.

NOI-2 Noise Receptors at Kendrick

Kendrick ER Section 3.7 relies on the baseline noise study done for Ross in 2010, described in Ross ER Section 3.7.3 and Addendum 3.7-A and Ross SEIS Section 3.8. Clarify further that this baseline remains accurate for Kendrick:

- A. Indicate how long it takes to construct a well (i.e., how long would the receptor be hearing the noise), whether other residences (besides the nearest) are close enough to a planned well to experience these levels, and how many wells are planned at those locations.
- B. Indicate whether any of the residences are sufficiently close to planned road construction to experience noise from those activities, and if so how long they would generally be exposed.
- C. Indicate whether the residences considered in the Ross study are representative of those closest to potential noise-generating activity at Kendrick, as well as

roads where increased traffic will travel over a longer time than estimated in the Ross SEIS.

- D. Since some activities have begun at Ross, provide information on the resulting noise that would be included in the Kendrick baseline.

HISTORIC AND CULTURAL RESOURCES

CUL-1 Tribal Survey

While the Class III archaeological and historical survey report is adequate, a tribal survey for potential TCPs has not been conducted for Kendrick. A similar survey was completed for the Ross ISR. Please be prepared to discuss Strata's intentions for identifying TCPs within the Kendrick project area.

CUL-2 Class III Survey

Provide a qualification statement for the survey principal investigator. The issue of field surveyor's qualifications has come up during previous licensing hearings. Thus, the curriculum vitae should be on file.

CUL-3 Inadvertent Discovery Plan

Confirm that the current Ross ISR Inadvertent Discovery Plan will be applicable to Kendrick.

VISUAL/SCENIC RESOURCES

VIS-1 Photos Typical Construction and Operations Phases

To facilitate a determination of visual impacts on nearby residents, provide photos of typical construction and operations phases of a mine unit at an ISR site.

VIS-2 Visibility of Kendrick Activities from Existing Residences

Kendrick ER Section 5.9 discusses that Strata will conduct baseline monitoring for potential light pollution for Ross, and the results will be used to prepare a light pollution monitoring plan, which will be modified to include Kendrick. However, there does not seem to be specific analysis of Kendrick activities and their visual impact on residences. Provide more information on the Kendrick activities that would be visible from existing residences.

SOCIOECONOMICS

SOC-1 Tax Revenue

Supplement the information in the Kendrick ER (Table 4.10-1) and Ross SEIS Section 4.11 to indicate how much of the tax revenue is attributable to Kendrick (including property taxes), and how much accrues to the state vs the county. This information will be used to determine impacts of Strata operations on county revenue.

PUBLIC AND OCCUPATIONAL HEALTH

POH-1 Occupational Injury and Fatality Rates

Occupational injury and fatality rates are provided in the Ross RAI responses (ER RAI P&O Health-1a). Confirm that they apply to Kendrick.

POH-2 Health Effects from Drinking Water

Indicate the populations served and the daily water consumption at each drinking water location. If this information was not supplied because it is likely that since there are no liquid radiological releases expected, and the drinking water locations are not near Kendrick or in the affected aquifers, provide a statement to that effect.

POH-3 MILDOS Modeling

Strata used MILDOS to calculate radionuclide releases and doses. While Kendrick ER Table 4.12-2 provides some site-specific MILDOS input data, all of the input data is needed to independently evaluate the modeling. In order to verify the applicant-calculated doses provided in Kendrick ER Table 4.12-3, provide the complete set of MILDOS input and output files used for the cited analysis.

POH-4 Dose to Workforce

Kendrick ER Section 4.12 does not specifically calculate dose to the workforce. Confirm the applicability of the information in the Ross ER, RAI responses, and SEIS to Kendrick and provide a breakdown of the total number of site workers versus “radiological” (badged) workers. This could be in the form of an average worker dose along with a total number of workers, or a total workforce dose along with a total anticipated number of badged workers.

WASTE MANAGEMENT

WM-1 Mixed Waste

Mixed waste is not discussed in the Kendrick ER. Confirm that the response to Ross ER RAI Waste-1(A) is applicable to Kendrick and state how this waste stream would be

managed. This information is needed to ensure all potential waste types are addressed in the impact analysis.

WM-2 Waste Minimization

The Kendrick ER does not provide a waste minimization plan. Confirm that the waste minimization plan for Ross presented in Ross ER Section 4.13 is applicable to Kendrick.

WM-3 Preconstruction Waste

Ross SEIS Section 3.13.1 SEIS states that “An average of 23,000 L (6,000 gal) of ground water, in addition to 12 m³ (15 yd³) of drilling muds, are produced during the development and sampling of monitoring wells,” specifically referencing preconstruction. Kendrick ER Table 4.13-1 also gives these same figures for construction.

- A. As cited in Ross SEIS Section 3.13.1 from the Ross ER, ground water is also produced during well testing conducted to characterize aquifer properties. This TENORM liquid waste is discharged under a temporary WYPDES permit. Identify if this is already included in the estimates in Kendrick ER Table 4.13-1.
- B. Break out wastes from preconstruction and construction for Kendrick based on the experience with Ross, now that activities have commenced, if data are available.
- C. Kendrick TR page 1-9 states: “Non-AEA-regulated solid waste will include construction debris and decontaminated material and equipment. Due to potential limitations at local landfills, Strata anticipates managing at least a portion of the non-AEA-regulated solid waste on company-owned property consistent with WDEQ/Solid and Hazardous Waste Division (SHWD) requirements.”

Kendrick ER page 4-103 states: “Construction/demolition waste will be transported to a municipal landfill for disposal in a designated containment system or disposed on-site in a WDEQ/SHWD approved facility on Strata-owned surface within or adjacent to the original Ross license area.”

Identify if a construction/demolition landfill will be, or has been, established at Ross or Kendrick for use by Strata. If so, provide the location of the landfill.

WM-4 Private Landfills

Kendrick ER Section 3.12 states that agricultural wastes generated in the area may be disposed at private landfills that are not subject to State regulation (as long as they are used only to dispose of wastes generated by an individual’s farming or ranching operation) or at the local State-permitted landfill in Moorcroft. Identify if any private landfills are currently located at Kendrick and if so, whether they are still actively being

used. This information will be used to clarify the affected environment in terms of waste management.

COST BENEFIT ANALYSIS

CB-1. Market Conditions

Provide someone knowledgeable to discuss:

- Current cost and market conditions information similar to those provided in the Ross ER on the yellowcake market.
- Current cost and market conditions information on the vanadium market, assuming that vanadium would continue to be produced in the Ross CPP.

CB-2. Tax Revenues

Have someone available to provide updated information on the tax revenues from the Kendrick project. The information presented in the Ross ER (Table 7.2-1) is at least 5 years old.

CB-3. Internal Costs

Have someone available to provide updated internal costs of the project as shown in Table 7.5-1 of the Ross ER.

ENVIRONMENTAL MONITORING

EM-1 Air Monitoring Stations

Strata has proposed to use five air particulate monitoring sites for the operational airborne radiation monitoring program. Passive radon and gamma radiation monitoring would be conducted at 11 sites, 5 of which are co-located with the air particulate monitoring sites. A comparison of Kendrick ER Figure 3.11-30 and Figure 6.1 in the Ross SEIS (Ross ER Addendum 3.6-A, Figure 3) indicates that at least two of the sites may already be in use as part of monitoring for Ross. Ross SEIS Figure 6.1 also indicates that some Ross sampling stations may be located within Kendrick, although they are not identified in Kendrick ER Figure 3.11-30. Clarify any overlap between monitoring stations for Ross and Kendrick.

EM-2 Environmental Monitoring Program

Kendrick ER Chapter 6 states that the environmental monitoring program for Kendrick is the same as that for Ross. However, the program as described in Kendrick ER Chapter 6 has some differences. Clarify whether the Kendrick program differs from that at Ross, particularly addressing the following.

- A. The Ross program has soil samples collected to 15 cm as well as subsurface samples collected to 150 cm, as described in Ross SEIS Section 6.2.2. Kendrick ER Section 6.1.2 states that all soil samples will be collected to a depth of 5

centimeters. The Ross program includes analyzing the soil and sediment samples for gross alpha, which is not mentioned for the Kendrick program.

- B. The Ross program (Ross SEIS Section 6.2.4) has surface water samples analyzed for Po-210 (as called for in Regulatory Guide 4.14); however, the Kendrick program does not (Kendrick ER Section 6.1.3.1). The Ross program is also analyzing surface water for gross alpha and gross beta, which are not mentioned for the Kendrick program.
- C. The Ross program (Ross SEIS Section 6.2.5) has ground water samples analyzed for Th-230, Po-210, and Pb-210 (as called for in Regulatory Guide 4.14); however, the Kendrick program does not (Kendrick ER Section 6.1.3.2). The Ross program is also analyzing ground water for gross alpha and gross beta, which are not mentioned for the Kendrick program.
- D. For nonradiological contaminants, Ross SEIS Section 6.3.1 indicates that Strata's operational monitoring program for Ross will "continue" the quarterly surface water sampling done for the pre-operational monitoring. Confirm the assumption that that this means Strata will sample for the same constituents during operations as for the baseline sampling. However, Kendrick ER Section 6.2.1 only lists pH, conductivity, temperature, uranium, Ra-226, Th-230, and Pb-210 for operational sampling, while Kendrick ER Addendum 3.4-D lists many additional constituents sampled for the baseline. If Strata decided to change what is sampled during operations (including cutting the non-radiological constituents) (unlike for Ross), provide the reasons for the change.
- E. For ground water monitoring, Kendrick TR Table 5.7-2 lists the parameters to be sampled for. Gross beta is included in the Ross program (and the ISR GEIS) but is not included on the Kendrick list, although the Kendrick list does have additional elements not on the ISR GEIS list. Explain why gross beta was not included on the Kendrick list.

EM-3 Operational Monitoring of Water Supply Wells

Kendrick ER Section 6.2.2.2, on nonradiological monitoring, states that existing water supply wells will be monitored during operations as described in ER Section 6.1.3.2, which described radiological monitoring only and not the nonradiological constituents that are the topic of this section. Section 6.3.2.1 of the Ross SEIS implies that Strata would sample for the constituents listed in ISR GEIS Table 8.2-1 for both the existing wells and the monitoring wells. Confirm this assumption (or provide clarification).