

From: [Kalman, Kenneth](#)
To: [NMSS DUWP Admin Resource](#)
Subject: FW: NRC staff comments on Cimarron submittals
Date: Tuesday, November 28, 2017 6:26:15 PM
Attachments: [Form 665s.doc](#)

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Docket 07000925

From: Kalman, Kenneth
Sent: Tuesday, November 28, 2017 6:23 PM
To: 'Lux, Jeff J' <jlux@burnsmcd.com>
Subject: NRC staff comments on Cimarron submittals

Jeff,

As noted in your October 27, 2017 Monthly Status Update, you submitted several documents to the NRC and are awaiting our comments. The NRC staff has reviewed most of the submittals you cited and our comments follow. As I have noted in previous conversations, health physics support has been limited and as a result, I am currently unable to provide comments on the two documents you submitted regarding enrichment. However, I expect to have more health physics support and will provide comments to you as soon as possible.

"Response to February 9, 2017 Request for Additional Information", dated May 25, 2017, (NRC's Agency wide Documents Access and Management System (ADAMS) Accession No. ML17303A159).

The NRC staff has no questions regarding the approaches proposed by the licensee to address the groundwater and remedial design related requests for additional information (RAIs) associated with the Cimarron Site Decommissioning Plan (DP). The staff recognizes that adequate responses to some of the RAIs will require either additional analysis of available site data (SER-1, SER-2, and SER-4), further groundwater flow modeling (SER-3), or field investigations/tests (SER-6). As also proposed, detailed responses to other RAIs (SER-7, SER-8, SER-9, SER-10, SER-11, and SER-12) will be included in the relevant sections of a revised DP.

The Licensee's response to SER-11 states that the proposed post-remediation groundwater monitoring network will include wells screened in Sandstone B, Transitional Zone, and alluvial deposits for the Western Alluvial Area and Burial Area #1. The NRC staff notes that monitoring well construction information, such as depth, screen length, and the aquifer being monitored should be included in Table 8-3 of the revised DP. In the response to SER-6, the remedial areas at the site will need to be redefined in the revised DP if Burial Area #2 is no longer in need of remediation.

"Groundwater Assessment Report", dated March 8, 2017 (ML17304A896)

The NRC staff reviewed this submittal and has no comments

"Vertical Distribution of Uranium in Groundwater", dated May 19, 2017 (ML17163A341)

The NRC staff reviewed this submittal and has no comments.

"Technical Memorandum Analysis of Analytical Method for Uranium Enrichment

Determination", dated May 4, 2017 (M17128A093)

To be reviewed

"Removal of Burial Area #2 Remediation from Decommissioning Plan" dated July 6, 2017 (ML17187A610)

The licensee proposed that its revised DP need not include Burial Area #2 for remediation as recent uranium concentrations in the groundwater have been below the site groundwater remediation criteria or Derived Concentration Guidelines (DCGL).

Although groundwater from the well installed in Burial Area 2 has been below DCGL since June 1992, by email dated November 9, 2017, the licensee noted that sediments in the western branch of the 1206 drainage yielded groundwater containing over 200 micrograms/liter uranium. Therefore, the licensee will conduct further investigation and NRC staff decision on the removal of Burial Area 2 be on hold until the NRC staff has reviewed the results of this investigation.

"Determination of Conservative U-235 Enrichment Levels for Groundwater at Cimarron Site Utilizing ICP-MS Data Collected December 2016 Through 2nd Quarter 2017", dated August 17, 2017 (ML17303A788)

To be reviewed

Let me know if you have any questions.

Ken