



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

February 9, 2018

Thomas Wohlford, Closure Manager
Grants Reclamation Project
Homestake Mining Company of California
P.O. Box 98/Highway 605
Grants, NM 87020

SUBJECT: REVISED SCOPE OF WORK – RE-SEEDING OF FORMER LAND
APPLICATION AREAS FOR DUST CONTROL
DOCKET NUMBER 40-8903

Dear Mr. Wohlford:

By letter dated November 28, 2017,¹ the Homestake Mining Company of California (Homestake) submitted a revised scope of work, proposing to re-seed three of the former land application areas at the Grants Reclamation Project (Grants) site in Grants, NM. Specifically, Homestake proposes re-seeding the land application areas with native vegetation to aid the re-establishment of vegetation to decrease windblown dust from these areas at the Grants site. In its letter, Homestake noted that the amount of dust and earth blowing from the non-vegetated areas on the southern portion of the Grants site has been the cause of some concern to the local community. The U.S. Nuclear Regulatory Commission (NRC) staff appreciates Homestake taking this preventive measure to address these concerns.

In the November 28, 2017, letter, Homestake stated that water from Homestake's San Andres Fresh Water Deep Well No. 2 would be used as the water source for the revised scope of work. Prior to using groundwater from Deep Well No. 2, the NRC staff suggests that Homestake perform water sampling from the well to ensure that there are no indications of impacts from up-gradient sources or due to degraded well conditions. Further, as required by Condition Number 35 of License SUA-1471, Homestake will continue to monitor the groundwater from Deep Well No. 2 to ensure that it does not become impacted.

In its letter, Homestake states that slightly-impacted groundwater had previously been used to irrigate and grow forage crops. This scope of work was originally submitted by letter dated June 16, 2017.² In that letter, Homestake submitted a scope of work proposing to re-seed the land application areas with native species and apply impacted groundwater to improve re-establishment. As verbally communicated to Homestake, the NRC staff notes that, as

¹ Agencywide Documents Access and Management System (ADAMS) Accession No. ML17340A405.

² ADAMS Accession No. ML17187A170.

dispositioned in its letter dated October 4, 2016,³ the use of impacted groundwater for the purpose of re-seeding is not allowed under Homestake's NRC license.

With respect to the volume of water required for dust-suppression activities during plowing and earth-work activities, NRC staff expects water usage to be low relative to the volume of water collected from the San Andres aquifer for remedial purposes. Specifically, the staff expects water usage to be less than the 62.4 million gallons that was proposed to be used as part of the scope of work request submitted by letter dated June 16, 2017.

Approximately 300 million gallons of water were collected at the Homestake site from the San Andres aquifer in 2016 as discussed in Section 2.1.8 of the 2016 Annual Monitoring Report/Performance Review, dated March 2017.⁴ Homestake shall ensure that water usage is monitored and in compliance with the State of New Mexico Office of the State Engineer requirements, under License No. 1605 and B28-T, approved September 8, 2017.

The NRC staff appreciates being given the opportunity to review this notification of a revised scope of work that does not involve an amendment to Homestake's NRC license. The staff coordinated its review with the State of New Mexico Environmental Department (NMED). The staff and NMED have completed the review and do not have any questions concerning the revised scope of work at this time. Groundwater monitoring data will continue to be monitored as it is typically provided within the Annual Monitoring Report/Performance Review to ensure that there are no groundwater impacts due to the application of water for dust suppression purposes.

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

³ ADAMS Accession No. ML16251A526.

⁴ ADAMS Accession No. ML17159A574.

T. Wohlford

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If you have any questions regarding this letter, please contact me at (301) 415-4090 or by e-mail to Jeffrey.White@nrc.gov.

Sincerely,

/RA/

Jeffrey A. Whited, Project Manager
Materials Decommissioning Branch
Division of Decommissioning, Uranium Recovery
and Waste Programs
Office of Nuclear Materials Safety
and Safeguards

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