

Rio Algom Mining LLC

February 9, 2018

Mr. Varughese Kurian
Nuclear Regulatory Commission
Two White Flint, Mail Stop T8F5
11545 Rockville Pike
Rockville, MD 20852

Re: **Ambrosia Lake Facility**
License SUA-1473, Docket No. 40-8905
Work Plan for the Rio Algom Mining Ambrosia Lake Site: Disposal Cells 1 and 2 Dams and
Tailings Characterization

Dear Mr. Kurian:

Rio Algom Mining LLC (RAML) is pleased to submit the enclosed *Work Plan for the Rio Algom Mining Ambrosia Lake Site: Disposal Cells 1 and 2 Dams and Tailings Characterization* ("Work Plan") for your review. The attached Work Plan describes the intent, technical approach, and procedures necessary for RAML to complete a Dam Safety Review in accordance with the Canadian Dam Association's (CDA) guidelines. The Dam Safety Review is a corporate mandate required by RAML's parent company, BHP. In addition, the Work Plan proposes the collection of additional data, and related analyses, that will support the Alternate Concentration Limit (ACL) Work Plan submitted to NRC in November 2017.

RAML proposes to conduct the activities detailed in the Work Plan under the requirements of License Condition 15 as follows:

"The licensee shall be required to use a Radiation Work Permit (RWP) for all work where the potential for significant exposure to radioactive material exists and for which no SOPs exist. All RWPs shall be approved by the Radiation Safety Officer (RSO), or his designee qualified by way of specialized radiation protection training. The RWP shall describe the following:

- A. The scope of work to be performed.*
- B. Any precautions necessary to reduce exposures to radioactive materials.*
- C. Supplemental monitoring required prior to, during, and after the completion of the work."*

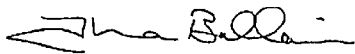
Section 3.3 of the enclosed Work Plan describes the development of supporting plans and documents, including preparation of a RWP.

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It is RAML's understanding that Ponds 1 and 2 were stabilized and closed according to NRC-approved designs referenced in License SUA-1473 Amendment 61. RAML intends to demonstrate this through the completion and submission of a Closure Completion Report for the Ambrosia Lake Mill Site. Any pertinent geotechnical data collected during the course of the Dam Safety Review will be incorporated into the Closure Completion Report, as appropriate.

The Dam Safety Review, as described in the enclosed Work Plan, is being executed independent of a specific license requirement. In addition, the Work Plan does not seek to modify, amend, or update the closure requirements previously approved by the NRC. For these reasons, it is RAML's understanding that a license amendment is not required for the completion of the proposed work. RAML looks forward to receiving NRC's comments on the Work Plan. Please let me know at your earliest convenience if you would like to schedule a technical meeting to discuss the proposed plan.

Sincerely,
Rio Algom Mining, LLC

A handwritten signature in black ink, appearing to read "Theresa Ballaine", with a stylized flourish at the end.

Theresa Ballaine
Site Manager

cc: Document Control
Bernadette Tsosie, LM DOE (via email)