



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

March 29, 2018

MEMORANDUM TO: Bill Von Till, Chief
Uranium Recovery Licensing Branch
Division of Decommissioning, Uranium Recovery
and Waste Programs
Office of Nuclear Material Safety
and Safeguards

FROM: Elise Striz, Project Manager /RA/
Uranium Recovery Licensing Branch
Division of Decommissioning, Uranium Recovery
and Waste Programs
Office of Nuclear Material Safety
and Safeguards

SUBJECT: PUBLIC MEETING SUMMARY

On February 22, 2018, a public meeting was held with Uranium One USA, Inc. at U.S. Nuclear Regulatory Commission Headquarters. The purpose of the meeting was to discuss open issues in the draft Ludeman Project Safety Evaluation Report (SER). A summary of the meeting is enclosed.

Enclosure: Meeting Summary

cc: Meeting Attendees

CONTACT: Elise Striz, NMSS/DUWP
(301) 415-0708

SUBJECT: PUBLIC MEETING SUMMARY DATE March 29, 2018

DISTRIBUTION: JTappert, MSampson, Meeting Attendees

ADAMS Accession No.: ML18078A748

OFFICE	DUWP	FSCE/ERB
NAME	EStriz	AWaldron
DATE	3/20/18	3/23/18

OFFICIAL RECORD COPY

MEETING REPORT

DATE: February 22, 2018

TIME: 11:00 a.m. to 1:00 p.m.

PLACE: U.S. Nuclear Regulatory Commission
Two White Flint North, Rockville, Maryland
Room TWFN 5D-30

PURPOSE: To discuss Ludeman Project Amendment draft license.

ATTENDEES:

See Attendees List (Attachment 1).

BACKGROUND:

Uranium One USA, Inc. (UO) submitted the Ludeman Project amendment request for the Willow Creek Project license SUA-1341 on December 3, 2011 (NRC's Agencywide Documents Access and Management System (ADAMS) Accession number ML12010A178). After submission of required information, the Nuclear Regulatory Commission (NRC) staff found the application acceptable for review on May 16, 2012 (ML12131A322). The U.S. NRC staff issued requests for additional information (RAIs) for the safety and environmental reviews on January 15, 2013 (ML12352A028, ML12352A030). On April 10, 2013, UO submitted a "change of design" request for the Ludeman Project Expansion (ML13106A238). In this request, UO committed to amend the application to address the proposed "change of design" modifications at a later date. NRC staff agreed to UO's request to defer submission of the "change of design" amended application to enable UO to include application revisions based on acceptable responses to RAIs. UO submitted almost all of the responses to RAIs on March 13, 2014 (ML14079A127). After a delay of a few months due to the NRC Health Physics (HP) staff working on other high-priority projects, the NRC staff was able to review the HP RAI responses and issued a second round of targeted HP RAIs on December 18, 2014 (ML14350A186). UO responded to the second round of targeted HP RAIs and other remaining RAIs on June 8, 2015 (ML15170A372). NRC staff and UO held public meetings on February 8, 2016 (ML16061A330) and February 22, 2017 (ML17072A180) to discuss numerous unresolved open issues for the safety and environmental review.

UO submitted a revised technical report on June 28, 2017 (ML17192A357) incorporating the major revisions to the original technical report based on the April 2013 "change of design" request, and responses to RAIs and open issues. UO also submitted a revised environmental report on August 25, 2017 (ML17261A460) incorporating the major revisions to the original technical report based on the April 2013 "change of design" request, and responses to RAIs and open issues. The revised technical and environmental reports provide the final basis for the staff's safety and environmental review.

The NRC staff has completed the final Ludeman Project Amendment Safety Evaluation Report (SER). The SER includes a table of new and revised license conditions that were necessary for

NRC staff to reach a safety finding for the Ludeman Project. NRC staff requested this public meeting to present the new and revised license conditions in the final SER to UO to ensure it understands their intent and technical basis, and to provide UO the opportunity to request revisions to improve the clarity of a license condition.

DISCUSSION:

NRC staff read the opening statement for the meeting. Attendees of the meeting were asked to provide brief introductions and sign the attendance sheet (Attachment 1). NRC staff provided an agenda for the meeting (Attachment 2). The NRC staff also publicly provided the new and revised license conditions found in Table 1.1-1 of the Ludeman Project Amendment SER for the public meeting (ML18044A970).

The NRC staff stated that all of the new and revised license conditions were necessary for NRC staff to reach safety findings in the SER. NRC staff then asked the licensee if it had any questions or needed clarification with respect to any of the license conditions.

UO first stated that it would like to revise License Condition (LC) 9.8 in Table 1.1-1. Specifically, UO requested that NRC staff add text to the first sentence of the fourth paragraph of LC 9.8 such that it states, "Regulatory Guide 8.30 (as revised), Table 2, or 49 CFR 173.421, shall apply to the removal of equipment, materials, or packages that have the potential for accessible radiological surface contamination levels above background to unrestricted areas with the licensed boundary" (emphasis added). UO explained that this requested change was based on Department of Transportation (DOT) regulations in 49 CFR to control potentially-contaminated equipment in unrestricted areas while these items remain in possession of the licensee. The NRC staff stated it is not familiar with this approach and explained that since this wasn't in the application, and NRC staff has no information before it to review, it would not change LC 9.8 before issuance of the SER in March 2018. However, the NRC staff agreed to consider the matter further. UO also requested the NRC staff to provide written verification of its January 11, 2018, letter regarding LC 9.8. The NRC staff agreed to look into completing this verification.

UO then requested that LC 10.2 be revised to clarify that the Willow Creek Project application is the appropriate reference for Mechanical Integrity Test (MIT) procedures at the Willow Creek Facility. NRC staff agreed to the revision.

UO next requested that NRC staff explain the basis for the revision to LC 10.7, that states in part, "For the Ludeman Project...Permeate from reverse osmosis of fluids from wellfields in restoration may be disposed of in the permeate pond." NRC staff explained that this text was required to ensure the licensee met its commitment in the revised technical report to discharge only permeate from Reverse Osmosis (RO) of restoration fluids to the permeate pond. NRC staff explained that only RO permeate of restoration fluids may be approved for surface water discharge from the permeate pond in the future under an EPA National Discharge Pollutant Elimination System (NPDES) permit. After this discussion, UO said they understood the basis and purpose of LC 10.7 and had no objection.

UO finally requested that NRC staff consider a revision to LC 10.24 to clarify the completion interval of the upgradient and downgradient monitoring wells for the Ludeman Project evaporation and permeate ponds. LC 10.24 states that these monitoring wells will be installed in

the 110 sand aquifer at a depth of at least 50 feet. UO staff were concerned that this description was too prescriptive and did not address reaching groundwater to ensure sampling could be conducted. NRC staff agreed that a revision may be needed and asked UO to provide a suggested revision as an action item.

At this point NRC staff and UO agreed that all of the remaining new and revised license conditions in the Ludeman Project Final SER were acceptable to all parties. NRC staff informed UO that as there were only minor revisions expected for LCs 10.2 and 10.24 based on the public meeting discussion, NRC staff would complete the final SER by the expected date of March 7, 2018.

No members of the public were in attendance at the meeting. The meeting concluded and adjourned at approximately 11:45 a.m. Eastern time.

ACTION ITEMS

Immediately after the public meeting, UO provided the following revision to LC 10.24 to address the one public meeting action item:

“The licensee will install three downgradient and one upgradient ground water monitoring wells ~~of at least 50 foot depth~~ in the 110 sand aquifer at both the evaporation and permeate ponds shown in Figure 1 of Addendum 4-A of the Ludeman Project Revised Technical Report. The monitoring wells will be completed at a depth sufficient to obtain ground water adequate to monitor and ~~The licensee will monitor these wells~~ to meet the requirements in License Conditions 10.4 and 11.2 with the exception that the licensee will monitor the wells at least quarterly. If an excursion is verified the licensee will not be required to implement immediate corrective actions, but will inform the NRC in 60 days of the actions it will take to determine if the excursion is associated with leaks from the evaporation or permeate ponds.”

The NRC staff found this revision to LC 10.24 acceptable. NRC staff modified license conditions 10.2 and 10.24 in the Final SER as agreed upon in the public meeting. These revisions were provided to and accepted by UO (ML181075A165). The Ludeman Project Amendment Final SER was publicly released on March 1, 2018 (ML18059A919).

Attachments:

1. List of Attendees
2. Meeting Agenda

Meeting Attendees
Date: Monday February 22, 2018
Room TWFN 5A-35
11:00 a.m. to 1:00 p.m.

Topic: To discuss Ludeman Project Amendment draft license

NAME	AFFILIATION
Elise Striz	U.S. NRC
Ashley Waldron	U.S. NRC
David Brown	U.S. NRC
Ron Linton	U.S. NRC
Douglas Mandeville	U.S. NRC
Tony Huffert	U.S. NRC
Scott Schierman	Uranium One USA
Greg Kruse	Uranium One USA
Donna Wichers	Uranium One USA

MEETING AGENDA
Uranium One Ludeman Project Amendment
Feb. 22, 2018
11:00 a.m. – 1:00 p.m.

NRC Two White Flint North, TWFN-5A35
11545 Rockville Pike
Rockville, MD

MEETING PURPOSE: To discuss Ludeman Amendment draft license.

MEETING PROCESS:

<u>Time</u>	<u>Topic</u>
11:00 a.m.	Introductions, Opening Remarks
11:05 a.m.	Discussion of draft license
12:45 p.m.	Public Comments
1:00 p.m.	Closing Remarks, Adjourn