



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

August 17, 2018

EA-16-114

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

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION – NRC REVIEW OF LAND
APPLICATION AREA REPORT AND FINAL STATUS SURVEY

Dear Mr. Wohlford:

By letter dated July 2, 2018,¹ the Homestake Mining Company of California (HMC) submitted its Final Status Survey Report for the land application areas as required by Conditions 14 and 15 of the U.S. Nuclear Regulatory Commission (NRC) Confirmatory Order (EA-16-114) that was issued by letter dated March 28, 2017.² After a review of the Final Status Survey and following conversations with HMC, the NRC staff determined that the enclosed additional information request is necessary to complete its review.

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).

¹ Agencywide Documents Access and Management System (ADAMS) Accession No. ML18186A577.

² ADAMS Accession No. ML17061A455.

T. Wohlford

- 2 -

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

Docket No. 040-08903
License No. SUA-1471

Enclosure:
NRC Request for Additional Information

cc: Distribution List

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION – NRC REVIEW OF LAND
APPLICATION AREA REPORT AND FINAL STATUS SURVEY,
DATED AUGUST 17, 2018

DISTRIBUTION: J. Katanic, RIV; R. Evans, RIV; S. Koenick, NMSS

ADAMS Accession No.: ML18205A460

***via e-mail**

Office:	NMSS	NMSS	NMSS	NMSS	NMSS	NMSS
Name:	JWhited	CHolston	JWebb*	ASchwartzman*	SKoenick	JWhited
Date:	07/25/18	07/25/18	07/26/18	07/26/18	07/31/18	08/17/2018

OFFICIAL RECORD COPY

REQUEST FOR ADDITIONAL INFORMATION
HOMESTAKE MINING COMPANY OF CALIFORNIA
REVIEW OF FINAL STATUS SURVEY FOR THE
LAND APPLICATION AREAS
Docket Number: 040-08903
License Number: SUA-1471
Confirmatory Order: EA-16-114

By letter dated September 25, 2017,¹ the Homestake Mining Company of California (HMC, the licensee) submitted its Land Application Report as required by Conditions 14 and 15 of the U.S. Nuclear Regulatory Commission (NRC) Confirmatory Order EA-16-114 that was issued by letter dated March 28, 2017.² In this letter, HMC detailed the impact assessment of its Land Application Program, which involved irrigating areas ranging from 100 to 394 acres with water containing elevated levels of groundwater constituents between 2000 and 2012. By letter dated November 14, 2017,³ HMC submitted its Final Status Survey Plan for release of the former land application areas. This letter provided the NRC with the detailed plans of HMC's Final Status Survey. By letter dated July 2, 2018,⁴ HMC submitted the results of its Final Status Survey.

During its review, the NRC staff noted that in the licensee's letter dated December 31, 2014,⁵ HMC provided details on the closure plan for the land application areas for the State of New Mexico to review. Section 3.1, Irrigation Equipment, of the report attached to the above stated letter notes that the HMC plans to dismantle the equipment used in the irrigation areas and remove it in accordance with HMC's NRC License Conditions. Additionally, this section notes that a survey plan to assess the presence of contaminated materials will be written in accordance with HMC procedures so as to ensure the equipment can be dispositioned appropriately.

No details regarding the above mentioned procedures were noted in the Final Status Survey Plan or the Final Status Survey Report. During conversations, the NRC staff asked HMC how the pipes within these areas were dispositioned. HMC stated that, as shown in Memorandum dated June 16, 2017,⁶ some pipes remain in the land application areas associated with the Land Application Program.

While the pictures in the above referenced memorandum show pipes associated with the Land Application Program, the memorandum does not specifically note the status of these pipes. Additionally, no details on any conducted surveys were provided.

¹ Agencywide Documents Access and Management System (ADAMS) Accession No. ML17270A066.

² ADAMS Accession No. ML17061A455.

³ ADAMS Accession No. ML17321A075.

⁴ ADAMS Accession No. ML18186A577.

⁵ ADAMS Accession No. ML15006A082.

⁶ ADAMS Accession No. ML17328A507.

Enclosure

After a review of these documents and following conversations with HMC, the NRC staff determined that the requests for additional information (RAIs) below are necessary to complete its detailed technical review.

Technical Basis for RAIs

Condition 14 of the Confirmatory Order requires the licensee to demonstrate that discharge of byproduct material did not impact and will not impact members of the public or the environment. To ensure that no additional impacts need to be considered, the NRC staff needs to understand the current status of the equipment associated with the Land Application Program, which may contain byproduct material.

RAI 1

Please provide information regarding the disposition of the pipes associated with the Land Application Program. Specifically, verify where the pipes associated with the Land Application Program are currently stored.

RAI 2

Please provide any details regarding any surveys of the pipes currently in place or following removal from the land application areas.

RAI 3

Please provide any details regarding any surveys of the soil around the pipes associated with the Land Application Program.

RAI 4

The NRC staff additionally notes that, as can be observed in the pictures in the Memorandum, the center pivot irrigation equipment appears to still remain on the land application areas. The NRC cannot complete its review of Conditions 14 and 15 of the Confirmatory Order until this equipment, and all pipes associated with the Land Application Program, are removed.

Please provide the details regarding the disposition of the center pivot irrigation equipment.