

From: [Kalman, Kenneth](#)
To: [Lux, Jeff J](#); [J. Paul Davis](#)
Cc: [Halliburton, Bill](#); [Guo, Lifeng](#)
Subject: RE: Conducting Vertical Profiling
Date: Monday, August 26, 2019 2:38:00 PM

Jeff,

The budget approval letter, dated May 16, 2019 specifically prohibited the installation of trenches and wells as they are part of the infrastructure for the decommissioning activities and the DP is still under review and not yet approved. Although the vertical profiling assessment of uranium is listed in item 8 under Task 4 - site decommissioning, it is part of site characterization activities. The vertical profiling assessment therefore can proceed without prior approval from NRC as it is required to complete the site DP.

Let me know if you have any other questions.

Thank you,

Ken

From: Lux, Jeff J <jlux@burnsmcd.com>
Sent: Monday, August 26, 2019 11:19 AM
To: Kalman, Kenneth <Kenneth.Kalman@nrc.gov>; J. Paul Davis <j.paul.davis@deq.ok.gov>
Cc: Halliburton, Bill <bhalli@burnsmcd.com>
Subject: [External_Sender] Conducting Vertical Profiling

The NRC's May 16 budget approval letter (attached) said, "... the NRC notes that activities 8 and 9 of the budget include installation of trenches and wells, which are proposals still under NRC review as part of the Cimarron Facility Decommissioning Plan (DP) (ADAMS Accession No. ML18323A197). Therefore, CERT may not commence these activities unless and until the NRC approves the DP.

I had taken that to mean that we were prohibited from doing **any** of the work identified in Activities 8 or 9 under "Task 4 – Site Decommissioning" in the Scope of Work attached to the April 1, 2019 proposed budget (see attached). In a phone conversation today, you said the intent of that language was not to prohibit the vertical profiling work, but to prohibit the installation of extraction wells or trenches.

I understand that the installation of these groundwater remediation components is an important part of the infrastructure proposed in *Facility Decommissioning Plan – Rev 1* (the DP) and that the NRC and the DEQ don't want that work performed until they complete their detailed technical review of the DP. To prevent others from coming to the same wrong conclusion I made, I would appreciate it if both the NRC and the DEQ would confirm that they do not prohibit all of the work described in Scope of Work Activities 8 and 9 in the April 1, 2019 proposed budget, just the installation of groundwater remediation infrastructure.

Thanks.

Jeff Lux, P.E.

Project Manager

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