



**Stantec Consulting Services Inc.**

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File: 233001369  
*Submitted electronically*

**Attention: Ms. Cinthya Román, Chief, Environmental Review Branch**

Division of Fuel Cycle Safety, Safeguards, and Environmental Review  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Dear Ms. Román,

**Reference: Response to August 6, 2019 Environmental Request for Additional Information (RAI) No. AQ-9, United Nuclear Corporation (UNC) License Amendment Request to Move Mine Waste from the Northeast Church Rock Mine to the Church Rock Mill Site, McKinley County, NM (Docket No. 040-8907)**

USNRC provided environmental RAIs on the *Application for Amendment of USNRC Source Material License SUA-1475 for the United Nuclear Corporation Mill Site* dated September 24, 2018 to United Nuclear Corporation and the General Electric Company (UNC/GE) via a letter dated August 6, 2019. UNC/GE provided responses to USNRC on September 5, 2019. The response to RAI AQ-9 in the September 5, 2019 response document stated that UNC/GE would provide a response to RAI AQ-9 within 30 days of the letter. On behalf of UNC/GE, this letter transmits the response to the USNRC environmental RAI AQ-9. This letter is being provided via email and will be submitted electronically via the USNRC Electronic Submissions System.

If you have questions on this submittal, please contact me via the contact information listed below or Roy Blickwedel (UNC/GE) at 1-610-529-6323 or Roy.Blickwedel@ge.com.

Regards,

**Stantec Consulting Services Inc.**

A handwritten signature in blue ink that reads "Melanie M. Davis".

Melanie Davis, P.E., PMP  
Project Manager  
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melanie.davis@stantec.com

Attachment: Response to USNRC RAI AQ-9 on the Application for Amendment of USNRC Source Material License SUA-1475 for the United Nuclear Corporation Mill Site

CC: Ashley Waldron, NRC  
Roy Blickwedel, UNC/GE  
Jason Cumbers, Stantec  
Peter Castiglia, INTERA

**ATTACHMENT**

**Response to USNRC RAI AQ-9 on the Application for Amendment of USNRC Source Material  
License SUA-1475 for the United Nuclear Corporation Mill Site**

***RAI AQ-9. Clarify non-radiological air monitoring and related corrective actions. Clarify when monitoring occurs over the lifespan of the project. Provide clarification on the UNC response to monitoring results above action levels.***

*UNC committed to non-radiological dust monitoring; however, it is unclear when nonradiological monitoring would occur during the project. The License Application Report (Stantec, 2018) contains portions of the 95% Design Report including the Removal Action Schedule (Appendix K of the license application document). Appendix K, Figure K. 1-1z "Preliminary Removal Action Schedule, " contains the project schedule, which identifies the 600 days when air monitoring would occur (Figure K. 1-1, line item 19); however, it is unclear if this schedule applies to only radiological monitoring or both radiological and non-radiological monitoring. The License Application Report, Appendix Q, contains the Dust Control and Air Monitoring Plan. Appendix Q, Table Q.4-1, "Summary of Perimeter Air Monitoring Plan, " describes the frequency of non-radiological airborne dust monitoring. This table states that non-radiological air monitoring for particulate matter PM<sub>2.5</sub> and PM<sub>10</sub> starts 2 days prior to construction, occurs 24 hours per day for the first 3 days of significant earthmoving activities, and then occurs continuously during working hours thereafter. However, it is unclear exactly how this description of the non-radiological monitoring would be incorporated into the overall project schedule as presented in Appendix K, Figure K. 1-1. Please clarify if non-radiological airborne dust monitoring occurs continuously during working hours over the 600 days specified in Appendix K, Figure K. 1-1, or describe when non-radiological airborne dust monitoring occurs within the context of the project duration.*

*The Dust Control and Air Monitoring Plan, Section Q. 4.2, "Nuisance Dust Monitoring, " identifies the non-radiological airborne dust action levels and states that the monitoring results will be reviewed and assessed to determine potential health hazards or risks. UNC should clarify what, if any, actions will be taken if the non-radiological monitoring results exceed the action levels.*

*This information is needed in accordance with 10 CFR 51.45(b), which requires that the ER describe the proposed action and its potential impacts on the environment.*

**RAI AQ-9 Response**

In the context of the schedule (Appendix K), both radiological and non-radiological air monitoring is shown as a single continuous concurrent activity "Air Monitoring" during construction. Non-radiological air monitoring would commence 2 days prior to the first earthmoving activity (Construct Access Roads, Line 43, Figure K.1-1), and then be conducted continuously during working hours throughout the entire duration of construction, ending when earthmoving activities are complete (Reclaim Former Millsite Yard, Line 73, Figure K.1-1).

The Contractor will be responsible for controlling nuisance dust. Similar to the required response to unacceptable visible dust, if air monitoring results indicate unacceptable dust levels, the Contractor shall be responsible for modifying the initial methods and/or implementing additional methods until acceptable results are achieved. All of the following methods are available to minimize/control dust generation during earthwork operations, as well as in response to air monitoring results that exceed action levels:

- Application of water or other approved dust suppressants to reduce visible dust during execution of work
- Avoidance of excavation or placement of overly dry or fine soils during high wind conditions to the extent practical

- Application of water or other approved dust suppressants to areas where wind can generate dust, including disturbed areas that are not being actively worked
- Use of windrows or other wind break methods
- Maintenance and protection of native vegetation where possible, through minimization of site disturbance
- Stabilization of inactive, disturbed work areas by longer term methods such as matting, tack and mulch, or crusting agents
- Implementation of permanent stabilization on a regular basis when sufficient area exists for application
- Application of water during loading
- Wetting or covering loads during hauling
- Street sweeping and/or cleaning as necessary
- Implementing haul road speed limits (see below)
- Limiting access and haul road development to the minimum necessary to execute work