



Grants Reclamation Project

Homestake Mining Company of California

David W. Pierce
Closure Manager

January 14, 2020

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Mr. Ron Linton, Project Manager
Project Manager, Materials Decommissioning Branch
Decommissioning, Uranium Recovery & Waste Programs
Office of Nuclear Materials Safety and Safeguards
U.S. Nuclear Regulatory Commission
MS T-5A10, 11545 Rockville Pike
Rockville, MD 20852

40-8903

RE: Homestake Mining Company of California – Grants Reclamation Project: Request for Amendment to License No. SUA-1471 to Permit RST Designees for Daily Inspections

Dear Mr. Linton:

Homestake Mining Company of California (HMC) is submitting this request to the U.S. Nuclear Regulatory Commission (NRC) to amend NRC License SUA-1471 for the Grants Reclamation Project (Site) to permit appropriately trained, qualified temporary designees to conduct daily walkthrough inspections of Site facilities on occasions when the radiation safety officer (RSO) and radiation safety technician (RST) for the Site are absent due to weekends, holidays, vacation, sick leave or other reasons (e.g. offsite training).

Unlike an operational uranium mill, all milling facilities at the Site were demolished decades ago, windblown contaminated soils were removed and placed in the tailings piles, and interim cover soils or evaporation ponds serve to contain/isolate tailings and other radioactive byproduct materials (e.g. residual solids from water treatment operations) from the active surface environment where human exposures would otherwise be possible. Based on decades of occupational radiation monitoring, worker exposures to radioactive materials and respective radiological doses are very low as typified by the data shown in Figure 1.

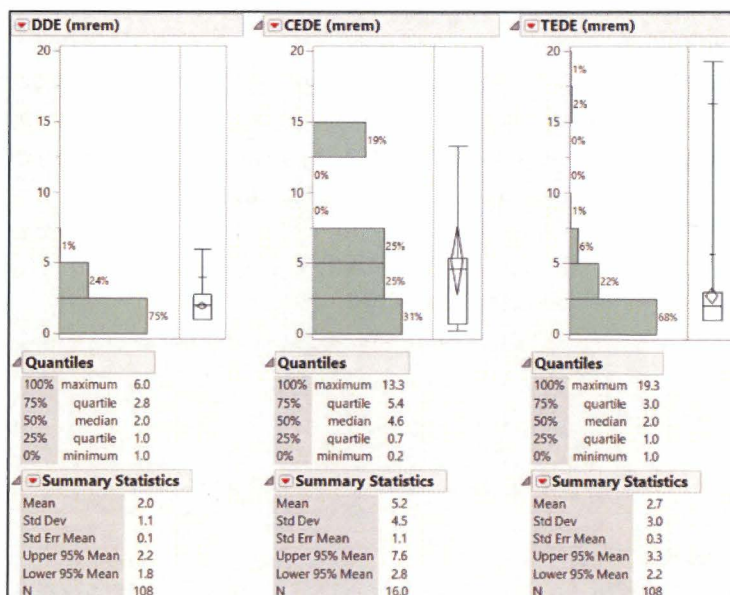


Figure 1: Occupational radiation doses for Site workers in 2018.

NMSSDI

Given the above circumstances, the primary objective of daily inspections is to identify upset conditions such as leaks or spills or signs of erosion or other physical/environmental factors that if not addressed, could lead to new exposure pathways, including unplanned releases of solid or liquid radioactive materials from engineered containment facilities [e.g. ponds, tailings piles and tanks/piping associated with the reverse osmosis (RO) water treatment plant]. Given the historically low potential for radiological exposures since major Site decommissioning activities were completed in the early 1990's (ERG, 1995; AKGI, 1996), effective daily inspections no longer warrant the level of health physics and radiation protection training/experience specified in NRC Regulatory Guide (RG) 8.31 for full-time radiation protection staff at an operational uranium milling facility.

Specifically, this license amendment request (LAR) proposes a change in license condition 32 (LC-32) to make the following exception to the general reference to RG 8.31 with respect to daily walkthrough inspections conducted by the RSO or RST:

"The licensee may temporarily assign qualified designee(s) to perform daily inspections in the absence of the RSO and RST. Qualified designee(s) shall receive sufficient training from the RSO and/or RST to ensure adequate knowledge of radioactive materials and respective containment facilities at the Site, identification of conditions that could result in loss of containment and unplanned releases, and what to do in the event that a release of radioactive materials and/or a new potential source of radiation exposure is identified. The training for qualified designees will include hands-on experience with daily walkthrough inspections led by the RSO or RST. Documentation of designee training shall be available for onsite review by NRC during Site inspections. A qualified designee may perform daily inspections on weekends, holidays, or anytime the RSO and RST must otherwise be absent during Site operations, not to exceed 7 consecutive days. The qualified designee shall contact the RSO and/or RST to report any upset conditions or identified changes in Site conditions that raise potential radiological exposure concerns with respect to licensed radioactive materials."

This exception to RG 8.31 specifications under LC-32 is necessary to avoid potential interruptions to continuous groundwater restoration operations at the Site, and given the radiological circumstances described above, this exception will not compromise the objectives of LC-32 or the effectiveness of the radiation protection program (RPP) in terms of keeping doses to workers and members of the public as low as reasonably achievable (ALARA). This license amendment request is consistent with the ALARA objectives of generic reference to RG 8.31 in LC-32.

Please note that a signed copy of NRC Form 313 is included in Attachment 1 to this submittal. Thank you for your time and attention on this matter. If you have any questions, please contact me via e-mail at dpierce@barrick.com or via phone at 505.238.9701.

Respectfully,



David W. Pierce
Closure Manager
Homestake Mining Company of California
Office: 505.287.4456 x34 | Cell: 505.238.9701

Copy To:

M. McCarthy, Barrick, Salt Lake City, Utah (electronic copy)
G. George, Davis, Wright and Tremaine, San Francisco, California (electronic copy)
C. Burton, Barrick, Henderson, Nevada (electronic copy)
R. Whicker, Environmental Restoration Group, Albuquerque, New Mexico (electronic copy)

REFERENCES:

Homestake Mining Company of California (HMC). 1995. Completion Report for Reclamation of Off-Pile Areas at the Homestake Mining Company of California Uranium Mill. Grants Operation. License No. SUA 1471. November 1995.

AK Geoconsult, Inc. (AKGI). 1996. Completion Report, Mill Decommissioning, Homestake Mining Company of California Grants Uranium Mill. February 29, 1996.

Enclosures: Attachment 1 – NRC Form 313

ATTACHMENT 1

NRC Form 313

NRC FORM 313

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0120

EXPIRES: 01/31/2020

(01-2020)
10 CFR 30, 32,
33, 34, 35, 36,
37, 39, and 40

APPLICATION FOR
MATERIALS LICENSE

Estimated burden per response to comply with this mandatory collection request: 4.3 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the Information Services Branch (T-6 A10M), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollect.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0120), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

INSTRUCTIONS: SEE THE CURRENT VOLUMES OF THE NUREG-1556 TECHNICAL REPORT SERIES ("CONSOLIDATED GUIDANCE ABOUT MATERIALS LICENSES") FOR DETAILED INSTRUCTIONS FOR COMPLETING THIS FORM: <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/>. SEND TWO COPIES OF THE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.

APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:

MATERIALS SAFETY LICENSING BRANCH
DIVISION OF MATERIAL SAFETY, STATE, TRIBAL AND RULEMAKING PROGRAMS
OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS
U.S. NUCLEAR REGULATORY COMMISSION
WASHINGTON, DC 20555-0001

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:

IF YOU ARE LOCATED IN:

ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA,
GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE,
NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO,
RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN
ISLANDS, OR WEST VIRGINIA,

SEND APPLICATIONS TO:

LICENSING ASSISTANCE TEAM
DIVISION OF NUCLEAR MATERIALS SAFETY
U.S. NUCLEAR REGULATORY COMMISSION, REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PA 19406-2713

IF YOU ARE LOCATED IN:

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND
APPLICATIONS TO:

MATERIALS LICENSING BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352

IF YOU ARE LOCATED IN:

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS,
LOUISIANA, MISSISSIPPI, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH
DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS,
UTAH, WASHINGTON, OR WYOMING,

SEND APPLICATIONS TO:

NUCLEAR MATERIALS LICENSING BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
1600 E. LAMAR BOULEVARD
ARLINGTON, TX 76011-4511

PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTIONS.

1. THIS IS AN APPLICATION FOR (Check appropriate item)

☐ A. NEW LICENSE

☒ B. AMENDMENT TO LICENSE NUMBER

SUA-1471

☐ C. RENEWAL OF LICENSE NUMBER

2. NAME AND MAILING ADDRESS OF APPLICANT (Include zip code)

Homestake Mining Company of California
P.O. Box 98
Grants, NM 87020

3. ADDRESS WHERE LICENSED MATERIALS WILL BE USED OR POSSESSED

Homestake Mining Company of California
560 Anaconda Road
Route 605
Milan, NM 87021

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

David W. Pierce

BUSINESS TELEPHONE NUMBER

(505) 287-4456 ext. 34

BUSINESS CELLULAR TELEPHONE NUMBER

(505) 238-9701

BUSINESS E-MAIL ADDRESS

dpierce@homestakeminingcoca.com

SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

5. RADIOACTIVE MATERIAL

a. Element and mass number; b. chemical and/or physical form; and c. maximum amount
which will be possessed at any one time.

6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.

8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.

9. FACILITIES AND EQUIPMENT.

10. RADIATION SAFETY PROGRAM.

11. WASTE MANAGEMENT.

12. LICENSE FEES (Fees required only for new applications, with few exceptions*)

(See 10 CFR 170 and Section 170.31)

*Amendments/Renewals that increase the scope of the existing license to a new or higher fee category will require a fee.

FEE
CATEGORYAMOUNT
ENCLOSED \$

PER THE DEBT COLLECTION IMPROVEMENT ACT OF 1996 (PUBLIC LAW 104-134), YOU ARE REQUIRED TO PROVIDE YOUR TAXPAYER IDENTIFICATION NUMBER. PROVIDE THIS INFORMATION BY COMPLETING NRC FORM 631: <https://www.nrc.gov/reading-rm/doc-collections/forms/nrc531info.html>.

13. CERTIFICATION. (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 37, 39, AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.

WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

CERTIFYING OFFICER - TYPED/PRINTED NAME AND TITLE

David W. Pierce Closure Manager

SIGNATURE

David W. Pierce

DATE

14 JAN 20

FOR NRC USE ONLY

TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS
			\$		
APPROVED BY				DATE	