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**Subject:** [External\_Sender] UNC Church Rock Answers to Questions  
**Date:** Monday, April 22, 2019 2:26:13 PM  
**Attachments:** [image003.png](#)

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Ashley,

On behalf of GE/UNC, please let the below information serve as responses to questions that I was asked during the March 2019 tour of the NECR Mine Site and UNC Mill Site. These questions were asked by members of the Southwest Research Institute, NRC's environmental consultant for preparing the EIS, with the intention of better understanding some of the information presented in the License Amendment Request or Supplemental Environmental Report.

**Q1: Which borrow area would be eliminated if borrow material were available from the Jetty area? Why?**

A1: Using the Jetty excavation as the primary borrow source would eliminate the need for the other four identified borrow sources (North, South, East, and West). The available borrow material from the Jetty area is estimated to be approximately 447,000 CY, which would be sufficient for construction. Because the four original borrow sources were considered equivalent in terms of their material properties, if only some were to be eliminated, they would be removed based on haul distance to the proposed Repository. North would be eliminated first, followed by south, then west, then east. If the Jetty soil were not used as borrow, the excavated soil would need to be disposed of on site.

**Q2: Please provide an update on the cost comparison presented in the Supplemental Environmental Report.**

A2: An update is not available at this time. Stantec, UNC/GE's engineering consultant, is currently preparing an update to the site surety estimate that includes the overall cost of construction for the Repository. The total estimated construction cost for the reclamation described in the LAR will be available once the surety estimate is submitted to NRC.

**Q3: Please provide (or direct us to the location in the LAR) where you present occupational injury or fatality estimates based on # of workers and construction time.**

A3: Based on data from the Bureau of Labor Statistics for civil construction work, the estimated number of non-fatal injuries during the 4-year duration of the removal action is 6. The estimated number of fatalities is less than 1 (0.01). References for these numbers are provided below.

- Heavy and Civil Engineering Construction ([https://www.bls.gov/iif/oshwc/osh/os/summ1\\_00\\_2017.htm](https://www.bls.gov/iif/oshwc/osh/os/summ1_00_2017.htm)): 2.5 injuries/100 workers NECR Conversion: 1.5 injuries per year (60 workers)
- Construction and Extraction (<https://www.bls.gov/iif/oshwc/cfoi/cfoi-chart-data-2017.htm>): 9.5/100,000 FTE NECR Conversion: .006 fatalities/year (60 workers)
- Construction and Extraction New Mexico (<https://www.bls.gov/iif/oshwc/cfoi/staterate2017.htm>): 17.8/100,000 FTE NECR Conversion: 0.01 fatalities per year (60 workers)

**Q4: Please provide an update on the laboratory analysis for the Jetty material. Can it be used as borrow?**

A4: The laboratory analysis from the 2018 Jetty Geotechnical evaluation is completed and the summary report is currently being prepared by Stantec. cursory review of the data indicates that the Jetty excavation soil is suitable as a borrow source for the proposed construction.

**Q5: In the LAR design package there is a comment about the cessation of the groundwater corrective action being completed and that equipment for the mine waste removal and repository would be available and on site to remove the ponds. This confuses the scope of the LAR versus other actions. To clarify, could you provide a table of each action indicating which are part of the LAR and which are not?**

A5: Please refer to the following table:

| Site Remediation Actions                                    | Part of the LAR | Not Part of the LAR |
|---|-----------------|---------------------|
| Construction of the Repository on the Existing TSF          | X               |                     |
| Groundwater Corrective Action Program                       |                 | X                   |
| Disposal of remaining mill site debris in evaporation ponds |                 | X                   |
| Decommission and reclaim evaporation ponds                  |                 | X                   |

|                                      |  |   |
|--------------------------------------|--|---|
| Well decommissioning and abandonment |  | X |
|--------------------------------------|--|---|

**Q6: Explain the stockpile locations and clarify those that are existing versus proposed. A map conveying this information for each of the four stockpiles (SP 1 – 4) would be most useful.**

A6: A map and explanation will be developed and submitted to NRC as a separate submittal.

I plan to submit the materials for A6 in the coming weeks. In the meantime, I hope that the answers to 1-5 are useful to you and your team.

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