

ALEX G. MORRISON Vice President and Controller

July 6, 2001

TELEPHONE: (925) 817-1318 FACSIMILE: (925) 817-1518 EMAIL: amorrison@homestake.com

U.S. Nuclear Regulatory Commission Division of Waste Management 11555 Rockville Pike Rockville, MD 20852-2738

Attn: Mr. Melvyn N. Leach

Branch Chief

Fuel Cycle Licensing Branch, NMSS

Mail Shop T-8A33

US Nuclear Regulatory Commission

Washington, DC 20555

Docket # 40-8903, License # SUA 1471

Financial Test to Demonstrate Financial Assurance

Dear Mr. Leach:

I am the Vice President and Controller of Homestake Mining Company, a Delaware Corporation having principal place of business at 1600 Riviera Avenue, Walnut Creek, CA 94596 ("Homestake" and "Guarantor"). This letter is in support of Homestake's use of the financial test to demonstrate financial assurance, as specified in 10 CFR Part 40, Appendix A.

Homestake Mining Company of California ("License") is a wholly owned subsidiary of Guarantor and holds the license SUA 1471 ("License") for the Milan Mill Uranium recovery facilities ("Facilities").

Homestake guarantees, through the parent company guarantee submitted for compliance under 10 CFR Part 40, Appendix A, the decommissioning reclamation and long-term surveillance and control of the Licensee's facilities. The cost estimate for reclamation, decommissioning, and long-term surveillance and control so guaranteed for these facilities is \$24 million.

I further attest that the Licensee for which this parent company guarantee is being made has a positive tangible net worth.

Guarantor is required to file a Form 10-K with the Securities and Exchange Commission ("SEC") for the latest fiscal year.

The fiscal year for Homestake ends December 31. The figures for the following items marked with an asterisk are contained in or derived from Homestake's independently audited, Mrssolpowic year-end financial statements and footnotes for the latest completed fiscal year ended December 31, 2000.

HOMESTAKE MINING COMPANY

HOMESTAKE MINING COMPANY FINANCIAL TEST TO DEMONSTRATE FINANCIAL ASSURANCE (In Thousands)

 Sum of decommissioning, reclamation and long-term surveillance and control cost estimates for facilities SUA 1471. 	\$	24,000
2.* Total liabilities (excluding Grants reclamation accrual)	\$	796,573
3.* Tangible net worth (excluding Grants reclamation accrual)	\$	622,802
4.* Net worth (excluding Grants reclamation accrual)	\$	622,802
5.* Current assets	\$	332,205
6.* Currents liabilities	\$	153,600
7.* Net working capital (line 5 minus line 6)	\$	178,605
8.* The sum of net income plus depreciation, depletion, amortization and noncash charges for property write-downs	\$	72,049
9.** Total assets in U.S. (required only if less than 90 percent of firm's assets are located in the U.S.)	\$	636,200
,		
Yes No	Yes	No
	Yes X	No
Yes No		No
Yes No 10. Is line 3 at least \$20 million?	Х	No
Yes No 10. Is line 3 at least \$20 million? 11. Is line 3 at least 6 times line 1?	X X	No X
Yes No 10. Is line 3 at least \$20 million? 11. Is line 3 at least 6 times line 1? 12. Is line 7 at least 6 times line 1? 13. Are at least 90 percent of firm's assets located in the U.S.?	X X	
Yes No 10. Is line 3 at least \$20 million? 11. Is line 3 at least 6 times line 1? 12. Is line 7 at least 6 times line 1? 13. Are at least 90 percent of firm's assets located in the U.S.? If, not complete line 14.	x x x	
 Yes No 10. Is line 3 at least \$20 million? 11. Is line 3 at least 6 times line 1? 12. Is line 7 at least 6 times line 1? 13. Are at least 90 percent of firm's assets located in the U.S.? If, not complete line 14. 14. Is line 9 at least 6 times line 1? 	x x x	
Yes No 10. Is line 3 at least \$20 million? 11. Is line 3 at least 6 times line 1? 12. Is line 7 at least 6 times line 1? 13. Are at least 90 percent of firm's assets located in the U.S.? If, not complete line 14. 14. Is line 9 at least 6 times line 1? Guarantor must pass two of the following three tests:	x x x	

^{*} Denotes figures contained in or derived from December 31, 2000 financial statements.

^{**} Intercompany balances of \$489 million with non-US companies are not eliminated.

I hereby certify that the content of this letter us true and correct to the best of my knowledge.

Alex Morrison

Vice President and Controller

July 7, 2001

Date



PricewaterhouseCoopers LLP 333 Market Street San Francisco CA 94105-2119 Telephone (415) 498 5000 Facsimile (415) 498 7100

July 6, 2001

Homestake Mining Company 1600 Riviera Avenue, Suite 200 Walnut Creek, California 94596

Dear Sirs:

We have audited the consolidated financial statements of Homestake Mining Company and subsidiaries (the Company) for the year ended December 31, 2000, and have issued our report thereon dated January 31, 2001. Our audit was made in accordance with auditing standards generally accepted in the United States of America and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances. This letter is based on our knowledge as of January 31, 2001 obtained in performing our audit of such financial statements, and should be read with that understanding.

At your request, we have performed the procedures enumerated below with respect to the accompanying letter from Mr. Alex G. Morrison, Vice President and Controller of Homestake Mining Company, to the United States Nuclear Regulatory Commission (NRC) dated July 6, 2001, which includes documents prepared by the Company regarding its financial responsibility under the NRC financial assurance regulations, in compliance with Appendix A of 10 CFR Part 40. It is understood that this letter is furnished solely for filing with the NRC in accordance with these regulations and is not to be used for any other purpose. The procedures that we performed are summarized as follows:

- 1. We compared the amounts included in items 5 and 6 in the letter referred to above with the corresponding amounts included in the financial statements referred to in the first paragraph.
- 2. We recomputed from, or reconciled to, the financial statements referred to in the first paragraph above, the information included in items 2, 3, 4, 7, 8, and 9 in the letter referred to above.
- 3. We proved the mathematical accuracy of the responses to items 10 through 17, inclusive, in the letter referred to above.

Because the procedures referred to in the preceding paragraph were not sufficient to constitute an audit made in accordance with auditing standards generally accepted in the United States of America, we do not express an opinion on any of the information or amounts listed above



Homestake Mining Company July 6, 2001

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which are included in the aforementioned letter. In performing the procedures referred to above, however, no matters came to our attention that caused us to believe the information included in items 2 through 17, inclusive, in the aforementioned letter should be adjusted.

Very truly yours,