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**Date:** 2/15/05 2:20PM  
**Subject:** GWMP Review - Docket 40-8027

Mike,

After evaluating the wells in Shale units 2 and 3 that Bill suggested we keep, we have decided to add some additional wells to our program. We will add MW065A and MW067A in Shale 2, and MW012A, MW049A, MW057A, 2303A, and a new well (MW130A) west of Pond 5. Attached are two drawings showing the approximate location of these wells.

We still believe that the other two wells in Shale 2 are not necessary due to the lack of water in the areas of interest. Attached is a brief description of what we find west of pond 2 for Bill's review. The NW area is covered by the investigation provided in the last response to RAIs. We do not plan to add any wells in either place; we do plan to trim the uranium plume shown in the NW corner of the Facility to more accurately represent what we found in our recent investigation. We are incorporating these changes to the GWMP for submittal to you by the end of the month.

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## Groundwater Availability West of Pond 2

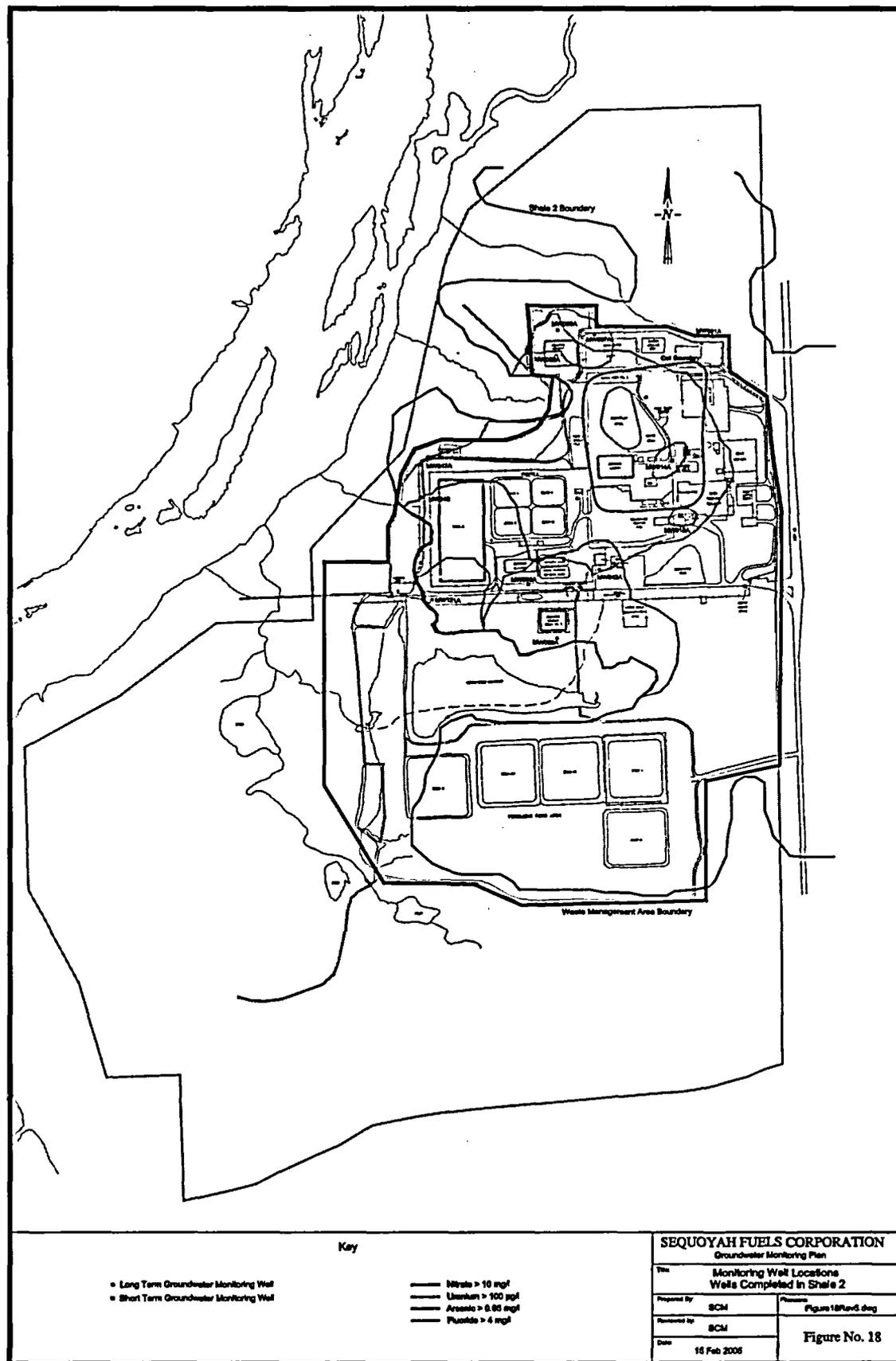
NRC proposed that SFC place a monitoring well between MW048 and MW121A west of Pond 2 to monitor the Shale 2 Unit groundwater in this area. See attached figure for well locations. There are two existing wells between MW048 and MW121A that could be used to monitor Shale 2 Unit groundwater. Both wells (MW041 and MW051) are at western edge of the Shale 2 Unit boundary.

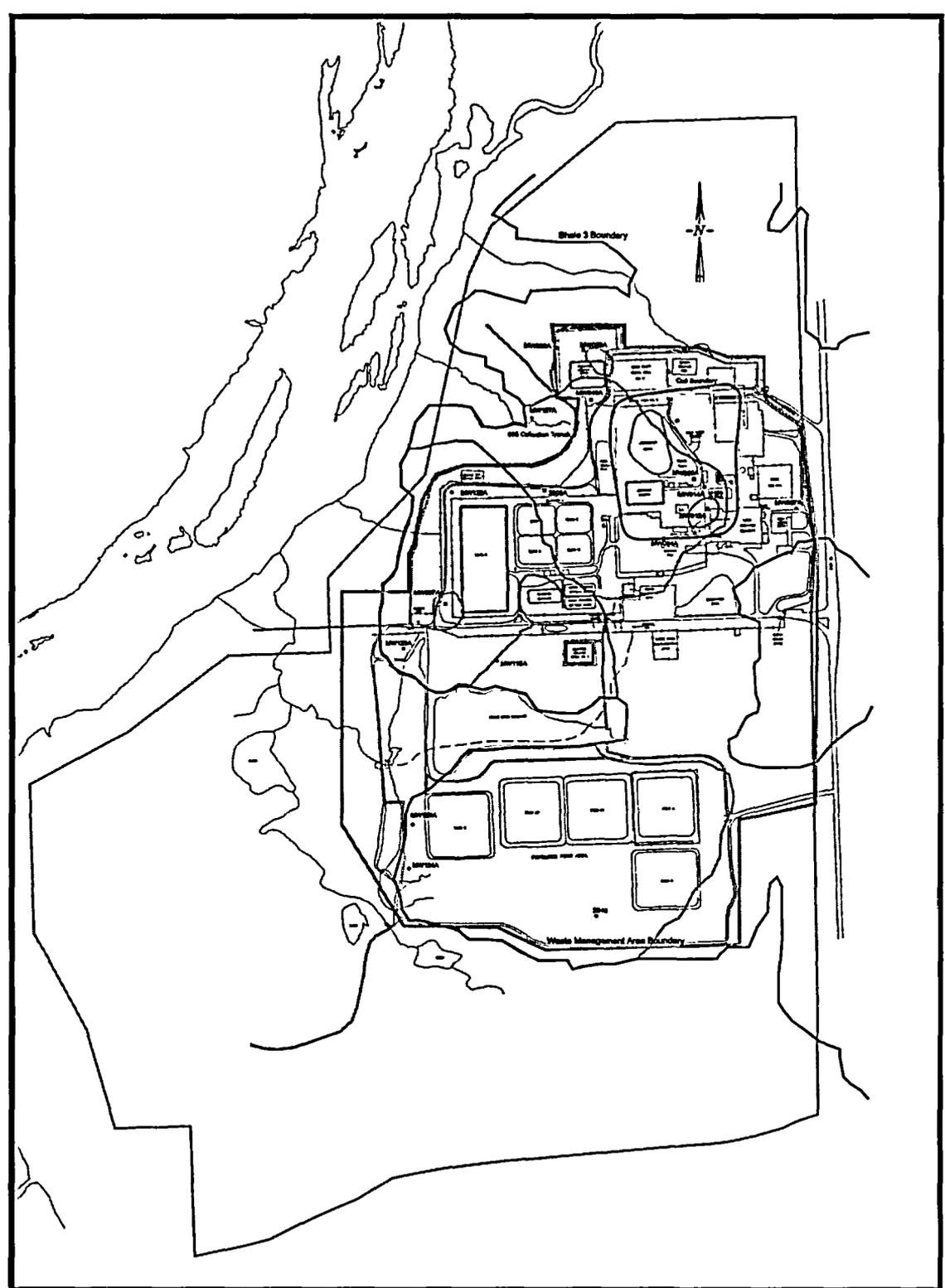
The day prior to sampling each monitoring well is purged. SFC has not been able to purge or sample MW041 and MW051 since they were dry or insufficient water was present to sample. The table below is a summary of notes made in the field logbook for these locations:

Date	Field Note / Volume Purged (gallons)	
	MW041	MW051
4/12/2000	Dry	Trace
10/24/2000	Trace	Trace
4/5/2001	Trace	Dry
10/10/2001	Dry	Dry
4/9/2002	Trace	0.2
10/23/2002	Trace	Dry
4/9/2003	Dry	Trace
10/15/2003	Dry	Dry
4/15/2004	Dry	Dry
11/10/2004	Dry	Dry

If a note is made that a well is "Dry" or a "Trace" amount of water is present there was not enough water to purge or sample the well. On April 9, 2002, two tenths of a gallon of water was purged from MW051. However, insufficient water was present to obtain a sample from the well following purging.

An investigation trench was installed west of Pond 2 to investigate the hydrogeological conditions in this area. The location of the trench is shown on the attached figure. There was very little water encounter north of Port Road. Small amounts of water would seep into the trench just north of Port Road over a period of 12 to 24 hours. Less water was encountered toward the north end of the trench. After several days a small amount of water was observed in a puddle at the north end of the trench. As the investigation trench progressed south of Port Road water could be observed seeping into the trench as the excavation was conducted. Water encountered throughout the bottom of this trench is associated with Unit 4 Shale and soil just above Unit 4 Shale. No water was found that could be attributed to Shale 2 or 3. (See CAP, Appendix B, for investigation details.)





Key		SEQUOYAH FUELS CORPORATION Groundwater Monitoring Plan	
● Long Term Groundwater Monitoring Well	—— Nitrate > 10 mg/l	Title Monitoring Well Locations Wells Completed in Shale 3	
● Short Term Groundwater Monitoring Well	—— Uranium > 100 µg/l	Prepared by SCM	Reviewed by Figure 19Rev5.dwg
	—— Arsenic > 0.05 mg/l	Approved by SCM	Figure No. 19
	—— Fluoride > 4 mg/l	Date 16 Feb 2005	

