Homestake Mining Company of California



Alan D. Cox Project Manager - Grants

30 August 2006

UPS Next Day Air:

Mr. Ron Linton, Project Manager c/o Document Control Desk Fuel Cycle Facilities Branch (Mailstop T8-A33) Division of Fuel Cycle Safety and Safeguards Office of Nuclear Materials Safety and Safeguards U. S. Nuclear Regulatory Commission 11545 Rockville Pike Two White Flint North Rockville, MD 20852-2738

RE:

Docket No. 40-8903 License No. SUA-1471

Semi-Annual Environmental Monitoring Report

Period - January through June 2006

Dear Mr. Linton:

Pursuant to US Nuclear Regulatory Commission Regulation 10 CFR 40.85 and Part 20, Homestake Mining Company of California hereby submits two (2) copies of their semi-annual report for the first-half of 2006 (January through June) for the Homestake Grants Reclamation Project.

Groundwater data for the project is filed with the year-end semi-annual report pursuant to our current NRC license condition LC-15.

The 600-gpm reverse osmosis (RO) plant operated at an average rate of 280-gpms during the January through June 2006 reporting period. Operating rates for the plant are related to the existing evaporation pond storage volume capacities and associated seasonal forced evaporative spray systems on Evaporations ponds #1 and #2.

Thank you for your time and attention on this matter. If you have any questions or require additional information, please contact me at the Grants office (505) 287-4456, ext. 25 or via cell phone at (505) 400-2794.

Sincerely yours.

HOMESTAKE MINING COMPANY OF CALIFORNIA

Alan D. Cox

Enclosures (2)

xc:

Mr. B. Spitzberg, Chief, Decommissioning Branch, w/enclosure

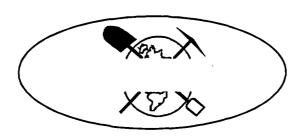
Mr. R. Chase, Barrick - SLC, w/enclosure Mr. B. Ferdinand, Barrick - SLC, w/enclosure

Mr. G. Hoffman, Hydro Engineering - Casper w/enclosure

Mr. S. Appaji, Region VI EPA - Dallas w/enclosure

Umssol

HOMESTAKE MINING COMPANY OF CALIFORNIA GRANTS PROJECT



SEMI-ANNUAL ENVIRONMENTAL MONITORING REPORT

JANUARY - JUNE

2006

U.S. Nuclear Regulatory Commission License SUA-1471 State of New Mexico DP-200

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1.0 INTRODUCTION

This Semi-Annual Environmental Monitoring Report summarizes effluent monitoring data recorded for Homestake Mining Company of California - Grants Project (Homestake) from January through June 2006. The submittal of this report to the appropriate Nuclear Regulatory Commission (NRC) Regional Office and State of New Mexico within 60 days after January 1, and July 1 for each year of operation is required for all uranium mill facilities pursuant to 10 CFR Part 40.65. The monitoring data and the report format have been selected by Homestake representatives to satisfy the requirements of 10 CFR Part 40.65.

Homestake's monitoring and surveillance program for radioactive effluent releases have been designed to ensure the project compliance with 10 CFR Part 40, and Part 20 <u>U.S. NRC Standards for Protection Against Radiation</u> and closely approximates programs as described in NRC's Regulatory Guide 4.14, <u>Radiological Effluent and Environmental Monitoring at Uranium Mills</u>. Some effluent monitoring activities differ from those presented in the Regulatory Guide 4.14 as required by Homestake's Radioactive Materials License (SUA-1471).

Recontouring reclamation activities began in September 1993 and mill demolition commenced in late October 1993 and was completed December 10, 1995. A mill decommissioning completion report was submitted in February 1996 and approved by the NRC on January 28, 1999. The large tailings pile has been re-contoured and covered with interim cover on the top and radon barrier on the outslopes. Bedding and erosion protection was placed on the outslopes after placement of the radon barrier. Soil cleanup verification of the off-pile contaminated soil (windblown tailings) is complete; the completion report was submitted December 18, 1995 and approved by the NRC on January 29, 1999. In addition, a decommissioning report for the mine ion-exchange (IX) plant was completed and approved on December 22, 1997.

During this reporting period Homestake operated a reverse osmosis water treatment plant as part of the ongoing ground water restoration program at the site. For the operating period from January through June, the RO plant processed an average 280-gpm while producing an average of 185-gpm of product water that was used for re-injection.

Homestake's groundwater monitoring program, as outlined in license Condition No. 35, continued throughout the report period. The requirements set forth in Condition No. 35 include the reporting of both radiological and non-radiological water quality parameters for specified wells, as well as the documentation of water injection and collection volumes of the groundwater cleanup system. The performance review of the corrective action program is submitted annually as a separate document and contains the groundwater monitoring information for January 1 through December 31 of each year. In order to meet NRC's requirement for semi-annual reporting, groundwater-monitoring data for the point-of-compliance (POC) wells and background well P will be included in the second half semi-annual environmental monitoring report. It should be noted that while the POC wells will eventually be used to demonstrate groundwater restoration, they are not currently representative of off-site groundwater quality conditions.

2.0 ENVIRONMENTAL MONITORING PROGRAMS

The monitoring requirements for the site are summarized in Table 1, Table 2, and Table 3 attached. Details of the monitoring program are discussed in the following sections:

2.1 Air Particulate Monitoring

Homestake continuously samples total suspended particulate at six locations around the reclamation site (see Figure 1). Those locations identified as HMC-1, HMC-2 and HMC-3 are areas at the property boundary expected to have the highest predictable concentrations of airborne radioactive particulate. The predominant wind direction is from the Southwest; accordingly, HMC-1, HMC-2 and HMC-3 are generally located down wind from Homestake's reclamation activities. The location identified as HMC-6 represents background conditions, and is located due west of the large tailings pile at the western most side of the property boundary. Locations HMC-4 and HMC-5 are site proximal to the nearest residences. The results are presented in Attachment 1.

Homestake uses a Sierra Instruments Model #305-200 High Volume Air Samplers (or equivalent) to continuously sample the ambient air of the locations shown in Figure 1. The samples are collected on 8-inch by 10-inch Whatman glass fiber filters (or equivalent), which are changed weekly or more frequently as required by dust loading. Energy Laboratories, Inc analyzes the collected samples quarterly for Natural Uranium, Radium-226, and Thorium-230.

2.2 Radon Gas Monitoring

Radon gas concentrations are monitored on a continuous basis at the eight locations identified in Figure 1. The background station for radon gas is HMC #16, located Northwest of the site. Landauer Corporation track-etch passive radon monitors (PRM), or the equivalent, are used to continuously monitor radon gas at each sampling location. Semi-annually Homestake personnel place new alpha particle sensitive detectors at the monitoring locations and the exposed detectors are retrieved and returned to Landauer Corporation for analysis. The technique by which the PRM detectors measure radon gas concentrations consists of exposing an alpha-particle sensitive plastic detector, which is mounted in a plastic container, to ambient air. The decay of radon gas contained in the ambient air causes imprint tracks on the alpha-sensitive detector that can then be counted at a later time. The radon gas concentration can subsequently be calculated by determining the number of tracks per unit area of the detector. A filter is placed over the container opening to inhibit the entrance of any alpha-emitting dust particles. The results are presented in Attachment 2.

3.0 WATER QUALITY MONITORING

Table 2 (8-99, as modified by Amendment 34), as attached, outlines the water quality sampling frequency and parameters monitored. In addition, the volumes of water injected and recovered as part of the ground-water cleanup program are monitored on a weekly frequency and the rates documented. A performance review report is submitted by March 31 of each year according to

License Condition 35E. The groundwater monitoring data for the POC wells and background well P, as required to comply with 10 CFR 40.65, will be included in the July - December Semi-Annual Environmental Report.

4.0 DIRECT RADIATION

Gamma exposure rates are continuously monitored through the use of optically stimulated luminescence (OSL) dosimeter badges placed at each of the seven locations identified in Figure 1. HMC #16 is considered the background location for direct radiation. Each OSL badge consists of an aluminum oxide detector within a plastic holder. The plastic provides adequate protection from weather for these badges to be used out-of-doors. The OSL's are exchanged semi-annually and analyzed by an approved independent laboratory (currently Landauer Inc.). The levels of direct environmental radiation are recorded for each of the seven locations. Pertinent sample data are reported in Attachment 3.

5.0 SURFACE CONTAMINATION

The Occupational Monitoring Program requirements are summarized in Table 3. The aspects related to contamination control are discussed briefly below.

5.1 Personnel Skin and Clothing

The monitoring of personnel for alpha contamination is required as part of all radiation work permits using standard operating procedures. No releases of personnel or clothing above administrative limits were reported during this reporting period.

5.2 Survey of Equipment Prior to Release for Unrestricted Use

Equipment surveys are required for all equipment that is to be removed from contaminated areas as specified in radiation work permits. Standard Operating Procedures are used for these surveys. No releases of contaminated material above NRC release criteria were reported.

6.0 LOWER LIMIT OF DETECTION

Homestake representatives have calculated the Lower Limit of Detection (LLD) for each measurement system, where applicable, to more accurately evaluate concentrations of radioactive material measured in the environment surrounding the mill site. The lower limit of detection is defined in U.S. Nuclear Regulatory Guide 8.30 – Appendix B as the smallest concentration of radioactive material that has a 95% probability of being detected. Radioactive material is "detected" if the value measured on an instrument is high enough to conclude that activity above the system background is probably present. Since the LLD is a function of sample volume, counting efficiency, radiochemical yield, etc., it varies for different sampling and analysis procedures.

For the individual measurement systems for which Homestake calculates LLDs, the following formula is utilized:

LLD =
$$\frac{3+4.66 \text{ S}_{b}}{3.7 \text{ E 4 EVY exp (-λt)}}$$

Where:
LLD is the lower limit of detection (microcuries per milliliter);
S_b is the standard deviation of the instrument background counting rate (counts per second);
3.7 E 4 is the number of disintegrations per second per microcurie;
E is the counting efficiency (counts per disintegration);
v is the sample volume (milliliters);
Y is the fractional radiochemical yield (when applicable);
λ is the radioactive decay constant for the particular radionuclide; and;

is the elapsed time between sample collection and counting

The value of S_b used in the calculation of the LLD for a particular measurement system will be based on the actual observed variance of the instrument background counting rate. The laboratory has been instructed to report the LLD for each measurement considering all of the parameters associated with the measurement system and the sample size.

The vendor laboratory that performed the analyses reported herein has documented that the LLD for air and water samples will meet or exceed the requirements in Regulatory Guide 4.14. This assumes a minimum water sample size of 1 liter and an air sample volume of 2 E09 ml. Landauer, Inc (vendor lab) reports the LLD for radon-222. The LLDs for the constituents are:

Ra-226, Th-230 in air	1 E-16 μCi/ml
Rn-222 in air	30 pCi(d/l)
U-nat in air	1 E-16 μCi/ml
U-rad in water	2 E-10 μCi/ml
Ra-226, Th-230 in water	2 E-10 μCi/ml

Uranium is analyzed by ICP-MS methods by the current vendor laboratory. In order to determine the LLD, the laboratory has performed the analysis on a blank sample many times and uses the standard deviation of these background measurements to calculate the LLD. This LLD is specified for all analyses as long as the sample size or volume meets the minimum value.

7.0 DATA SUMMARY AND CONCLUSIONS

The summaries of Homestake's effluent monitoring program included in this submittal contain data for each of the regulated parameters released to unrestricted areas. DP-200, dated November 15, 1995, and 10 CFR Part 40.65 requires that Homestake submit effluent release monitoring data to the State of New Mexico and the NRC within 60 days of the end of the six-month period ending January 1 and July 1 of each year. Homestake is submitting this report to satisfy the regulatory requirements cited above. The attachments included in this report summarize the results of the effluent monitoring activities conducted by Homestake and pertinent to the required monitoring time period.

The data collected in many of Homestake's effluent monitoring programs can be readily compared to 10 CFR Part 20 values. Homestake has not exceeded 10 CFR Part 20 values in any of their effluents monitored during the period covered by this report. This, of course, does not include the ground water values at the POC wells as discussed earlier.

Table 1 - Environmental Monitoring Program Excluding Groundwater Monitoring

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Type of Sample	Number	Locations	Method	Frequency	Analytical Parameters
AIR	3	HMC1, HMC2, HMC3	Comtinue	Washin Class	Natural
Particulates	at or near the site boundary in sectors th have the highest predicted concentrations of radioactive airborne particulates.		Continuous (High Vol.)	Weekly filter change or more frequently as required. Samples composited and analyzed quarterly.	Natural Uranium, Radium-226, Thorium-230
	2	HMC4, HMC5 at nearest occupied residences	Continuous (High Vol.)	Weekly filter change, or more frequently as required. Samples composited and analyzed quarterly.	Natural Uranium, Radium-226, Thorium-230
	1	HMC6 background location	Continuous (High Vol.)	Weekly filter change, or more frequently as required. Samples composited and analyzed quarterly.	Natural Uranium, Radium-226, Thorium-230
Radon Gas	8	Locations described in Air - Particulates & HMC7 on S boundary & HMC16 as a background	Continuous Track-etch	Semi-Annual	Rn-222
DIRECT RADIATION	7	Locations described in Air - Particulates & HMC-16 as a background	OSL	Semi-Annual	Gamma Exposure Rate

Table 2 – Groundwater Monitoring Program (8-99, as modified by Amendment 34)

Table 2 - Groundwater Monitoring Program (8-99 as modified by Amendment 34)

Well Number	Parameters to be Monitored	Frequency of Monitoring	
#1 & #2 Deepwells	D	Annually	
Broadview Acres Wells 446, SUB1, SUB2, SUB3	G	Annually	
Felice Acres Wells 490, 492, 493, 494	G	Annually	
Murray Acres Wells 802, 844	G	Annúally	
Pleasant Valley Wells 688, 846	G	Annually	
Regional Wells 920, 942	G	Annually	
Site Monitoring Wells F, FB, GH, MO, CW2	G	Annually	
Collection System Wells	Total Volume	Monthly	
Injection System Wells	Total Volume	Monthly	
Reversal Wells B, BA, KZ, KF, SO, SP, S1, S2	Water Level	Weekly	
Point of Compliance Wells D1, X, S4	B, F	Annually	
Background Well P	В	Annually	

B = Water Level, pH, TDS, SO₄, Cl, HCO₃, CO₃, Na, Ca, Mg, K, NO₃, U, Se, Mo, Ra-226

D = Ca, Mg, K, Na, HCO₃, CO₃, Cl, SO₄, pH, TDS, Al, As, Ba, Cd, Co, Cu, CN, F, Fe, Pb, Mn, Hg, Mo, Ni, NO₃ as N, Se, Ag, Zn, U, Filtered Ra-226

F = V, Ra-228, Th-230

G = Water Level, SO₄, U, Se, TDS, Mo

Table 3 - Occupational Monitoring Program (6-00)

Table 3 – Occupational Monitoring Program (6-00)

Type of Sample	Number	Locations	Method	Frequency	Analytical Parameters
Lapel Personal Air Sample	As required by RWP	As required by RWP (2 L/min or equivalent)	HP-1	As required by RWP	Alpha, U-Nat
Lapel Personal Air Sampler Calibration	As required by RWP	N/A	HP-1	As required by RWP	Flow rate
Release of Equipment	As required by RWP	Potentially Contaminated Equipment and Materials	HP-4	As required by RWP	Alpha, beta gamma
ALARA	N/A	As required by RPA	HP-6	Ŋ/A	As required by RPA
Respiratory Protection	As required by RWP	As required by RWP	HP-7	N/A	N/A
Bioassay	As required by RWP	As required by RWP	HP-8 after mill decommissioning; termination	Baseline, Semi-annual	U-Nat in urine
Instrument Calibration	Variable	Radiation Detection Instruments in use	HP-10	Annually	N/A
Personnel Gamma (OSL)	Variable	Personnel	HP-11	Quarterly	Gamma
Personnel Contamination	As required by RWP	As required by RWP	HP-12	As required by RWP	Alpha
Radiation Protection Training	As required	Mill Site taught by RPA (certified individual) subjects as per Reg Guide 8.31	HP-14 for people working with groundwater or physical work with tailings sand/ slimes	Initial & annual refresher	Training Class & Written Test

HP-# = Homestake procedure number; RPA = Radiation Protection Administrator;

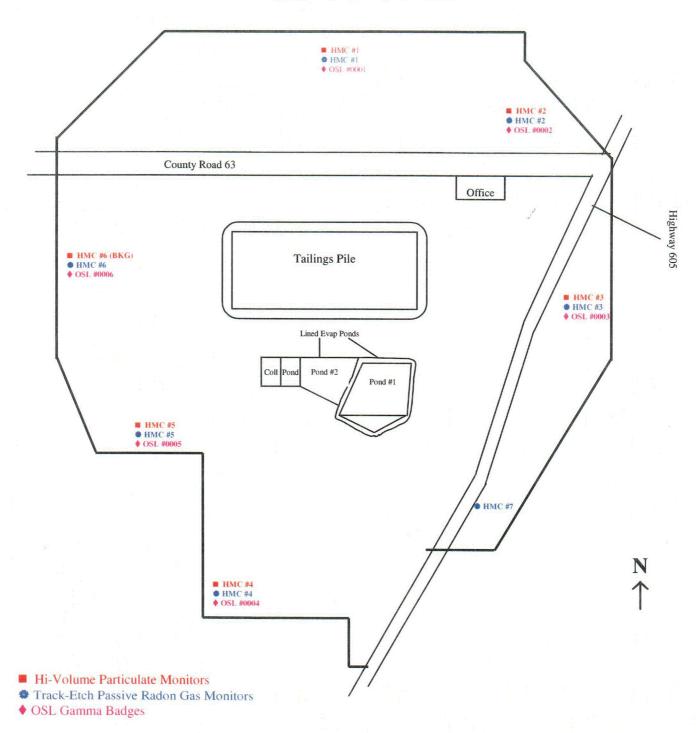
RWP = Radiation Work Permit; OSL = Optically Stimulated Luminescence dosimeter

Figure 1 – Monitoring & Sampling Locations

HOMESTAKE MINING COMPANY GRANTS PROJECT

Monitoring & Sampling Locations

HMC #0016 (BKG)
 OSL #0016 (BKG)



Attachment 1 – High Volume Air Sampling Results



Client: Homestake Mining Company

Project: Grants 1st Quarter 2006 Comp

Lab ID: C06040080-001

Client Sample ID: HMC-1 Hi-Vol Filter Comp

Report Date: 05/18/06

Collection Date: Not Provided

Date Received: 04/03/06

Matrix: Filter

	MCL/								
Analyses	Result	Units	Qual	RL QCL	Method	Analysis Date / By			
RADIONUCLIDES - TOTAL									
Radium 226	9.8	pCi/Filter		0.2	E903.0	04/18/06 14:30 / trs			
Radium 226 precision (±)	2.4	pCi/Filter			E903.0	04/18/06 14:30 / trs			
Thorium 230	14.2	pCi/Filter		0.2	E907.0	04/18/06 10:00 / df			
Thorium 230 precision (±)	3.0	pCi/Filter			E907.0	04/18/06 10:00 / df			
Uranium, Activity	19.7	pCi/Filter		0.2	SW6020 🏸	04/07/06 22:54 / sml			

Report Definitions: RL - Analyte reporting limit. QCL - Quality control limit. MCL - Maximum contaminant level.



Client: Homestake Mining Company

Project: Grants 1st Quarter 2006 Comp

Lab ID: C06040080-002

Client Sample ID: HMC-2 Hi-Vol Filter Comp

Report Date: 05/18/06

Collection Date: Not Provided

Date Received: 04/03/06

Matrix: Filter

	MCL/							
Analyses	Result	Units	Qual	RL QCL	Method	Analysis Date / By		
RADIONUCLIDES - TOTAL								
Radium 226	12	pCi/Filter		0.2	E903.0	04/18/06 14:30 / trs		
Radium 226 precision (±)	2.5	pCi/Filter			E903.0	04/18/06 14:30 / trs		
Thorium 230	17.6	pCi/Filter		0.2	E907.0	04/18/06 10:00 / df		
Thorium 230 precision (±)	3.2	pCi/Filter			E907.0	04/18/06 10:00 / df		
Uranium, Activity	18.5	pCi/Filter		0.2	SW6020	04/07/06 22:58 / sml		

Report
Definitions:

RL - Analyte reporting limit. QCL - Quality control limit. MCL - Maximum contaminant level.





Client: Homestake Mining Company

Project: Grants 1st Quarter 2006 Comp

Lab ID: C06040080-003

Client Sample ID: HMC-3 Hi-Vol Filter Comp

Report Date: 05/18/06

Collection Date: Not Provided

Date Received: 04/03/06

Matrix: Filter

	MCL/							
Analyses	Result	Units	Qual	RL QCL	Method	Analysis Date / By		
RADIONUCLIDES - TOTAL								
Radium 226	21	pCi/Filter		0.2	E903.0	04/18/06 14:30 / trs		
Radium 226 precision (±)	3.3	pCi/Filter			E903.0	04/18/06 14:30 / trs		
Thorium 230	15.6	pCi/Filter		0.2	E907.0	04/18/06 10:00 / df		
Thorium 230 precision (±)	2.2	pCi/Filter			E907.0	04/18/06 10:00 / df		
Uranium, Activity	53.3	pCi/Filter		0.2	SW6020	04/07/06 23:02 / sml		

Report Definitions: RL - Analyte reporting limit. QCL - Quality control limit. MCL - Maximum contaminant level.



Client: Homestake Mining Company

Project: Grants 1st Quarter 2006 Comp

Lab ID: C06040080-004

Client Sample ID: HMC-4 Hi-Vol Filter Comp

Report Date: 05/18/06

Collection Date: Not Provided

Date Received: 04/03/06

Matrix: Filter

	MCL/							
Analyses	Result	Units	Qual RL QCL		Method	Analysis Date / By		
RADIONUCLIDES - TOTAL								
Radium 226	13	pCi/Filter		0.2	E903.0	04/18/06 14:30 / trs		
Radium 226 precision (±)	2.7	pCi/Filter			E903.0	04/18/06 14:30 / trs		
Thorium 230	10.8	pCi/Filter		0.2	E907.0	04/18/06 10:00 / df		
Thorium 230 precision (±)	2.3	pCi/Filter			E907.0	04/18/06 10:00 / df		
Uranium, Activity	21.5	pCi/Filter		0.2	SW6020	04/07/06 23:06 / sml		

Report Definitions:

RL - Analyte reporting limit. QCL - Quality control limit. MCL - Maximum contaminant level.





Client: Homestake Mining Company

Project: Grants 1st Quarter 2006 Comp

Lab ID: C06040080-005

Client Sample ID: HMC-5 Hi-Vol Filter Comp

Report Date: 05/18/06

Collection Date: Not Provided

Date Received: 04/03/06

Matrix: Filter

	MCL/							
Analyses	Result	Units	Qual RL QCL		Method	Analysis Date / By		
RADIONUCLIDES - TOTAL								
Radium 226	11	pCi/Filter		0.2	E903.0	04/18/06 14:30 / trs		
Radium 226 precision (±)	2.5	pCi/Filter			E903.0	04/18/06 14:30 / trs		
Thorium 230	13.2	pCi/Filter		0.2	E907.0	04/18/06 10:00 / df		
Thorium 230 precision (±)	2.8	pCi/Filter			E907.0	04/18/06 10:00 / df		
Uranium, Activity	26.1	pCi/Filter		0.2	SW6020	04/07/06 23:27 / sml		

Report Definitions:

RL - Analyte reporting limit.

QCL - Quality control limit.

MCL - Maximum contaminant level.





Client: Homestake Mining Company

Project: Grants 1st Quarter 2006 Comp

Lab ID: C06040080-006

Client Sample ID: HMC-6 Hi-Vol Filter Comp

Report Date: 05/18/06

Collection Date: Not Provided

Date Received: 04/03/06

Matrix: Filter

	MCL/								
Analyses	Result	Units	Qual	RL QCL	Method	Analysis Date / By			
RADIONUCLIDES - TOTAL									
Radium 226	9.9	pCi/Filter		0.2	E903.0	04/18/06 14:30 / trs			
Radium 226 precision (±)	2.5	pCi/Filter			E903.0	04/18/06 14:30 / trs			
Thorium 230	11.2	pCi/Filter		0.2	E907.0	04/18/06 10:00 / df			
Thorium 230 precision (±)	2.5	pCi/Filter			E907.0	04/18/06 10:00 / df			
Uranium, Activity	15.0	pCi/Filter		0.2	SW6020 🏸	04/07/06 23:35 / sml			

Report Definitions: RL - Analyte reporting limit.

QCL - Quality control limit.

MCL - Maximum contaminant level.



Client:

Homestake Mining Co

Site Name:

Grants

Report Date: 08/04/06

Lab ID:

C06070040-001

Collection Date: Not Provided

Client Sample ID: Hmc-1-Hi-Vol Filter

DateReceived: 07/03/06

Matrix:

Filter

Analyses	Result	Units	Qualifier	RL	MCL/ QCL	Method	Analysis Date / By
RADIONUCLIDES - TOTAL							
Radium 226	44	pCi/Filter	D	0.4		E903.0	07/18/06 22:18 / trs
Radium 226 precision (±)	5.2	pCi/Filter				E903.0	07/18/06 22:18 / trs
Thorium 230	25.5	pCi/Filter		0.4		E907.0	07/18/06 00:00 / df
Thorium 230 precision (±)	3.6	pCi/Filter				E907.0	07/18/06 00:00 / df
Uranium, Activity	112	pCi/Filter	D	8.0		SW6020	07/11/06 18:35 / sml

Lab ID:

C06070040-002

Collection Date: Not Provided DateReceived: 07/03/06

Client Sample ID: Hmc-2 Matrix:

Filter

Analyses	Result	Units	Qualifier	RL	MCL/ QCL	Method	Analysis Date / By
RADIONUCLIDES - TOTAL							
Radium 226	30	pCi/Filter	D	0.4		E903.0	07/19/06 00:19 / trs
Radium 226 precision (±)	4.5	pCi/Filter				E903.0	07/19/06 00:19 / trs
Thorium 230	19.2	pCi/Filter		0.4		E907.0	07/18/06 00:00 / df
Thorium 230 precision (±)	3.4	pCi/Filter				E907.0	07/18/06 00:00 / df
Uranium, Activity	137	pCi/Filter	D	8.0		SW6020	07/11/06 18:39 / sml

Lab ID:

Matrix:

C06070040-003

Collection Date: Not Provided DateReceived: 07/03/06

Client Sample ID: Hmc-3

Filter

Analyses	Result	Units	Qualifier	RL	MCL/	Method	Analysis Date / By
RADIONUCLIDES - TOTAL							
Radium 226	137	pCi/Filter	D	0.4		E903.0	07/19/06 01:20 / trs
Radium 226 precision (±)	9.2	pCi/Filter				E903.0	07/19/06 01:20 / trs
Thorium 230	41.6	pCi/Filter		0.4		E907.0	07/18/06 00:00 / df
Thorium 230 precision (±)	5.1	pCi/Filter	,			E907.0	07/18/06 00:00 / df
Uranium, Activity	493	pCi/Filter	D	8.0		SW6020	07/11/06 18:44 / sml

Report Definitions:

RL - Analyte reporting limit.

MCL - Maximum contaminant level.

QCL - Quality control limit.

ND - Not detected at the reporting limit.

D - RL increased due to sample matrix interference.



Client:

Homestake Mining Co

Site Name:

Grants

Report Date: 08/04/06

Lab ID:

C06070040-004

Collection Date: Not Provided

Client Sample ID: Hmc-4 Matrix:

Filter

DateReceived: 07/03/06

Analyses	Result	Units	Qualifier	RL	MCL/ QCL	Method	Analysis Date / By
RADIONUCLIDES - TOTAL							
Radium 226	13	pCi/Filter	D	0.4		E903.0	07/19/06 02:20 / trs
Radium 226 precision (±)	2.9	pCi/Filter				E903.0	07/19/06 02:20 / trs
Thorium 230	36.8	pCi/Filter		0.4		E907.0	07/18/06 00:00 / df
Thorium 230 precision (±)	5.1	pCi/Filter				E907.0	07/18/06 00:00 / df
Uranium, Activity	393	pCi/Filter	D	8.0		SW6020	07/11/06 19:04 / sml

Lab ID:

C06070040-005

Client Sample ID: Hmc-5

Collection Date: Not Provided DateReceived: 07/03/06

Matrix:

Filter

Analyses	Result	Units	Qualifier	RL	MCL/ QCL	Method	Analysis Date / By
RADIONUCLIDES - TOTAL				•			
Radium 226	16	pCi/Filter	D	0.4		E903.0	07/19/06 03:21 / trs
Radium 226 precision (±)	3.2	pCi/Filter				E903.0	07/19/06 03:21 / trs
Thorium 230	14.7	pCi/Filter		0.4		E907.0	07/18/06 00:00 / df
Thorium 230 precision (±)	2.6	pCi/Filter				E907.0	07/18/06 00:00 / df
Uranium, Activity	718	pCi/Filter	D	8.0		SW6020	07/11/06 19:08 / sml

Lab ID:

C06070040-006

Filter

Client Sample ID: Hmc-6

Matrix:

Collection Date: Not Provided DateReceived: 07/03/06

Analyses	Result	Units	Qualifier	RL	MCL/ QCL	Method	Analysis Date / By
RADIONUCLIDES - TOTAL							
Radium 226	18	pCi/Filter	D	0.4		E903.0	07/19/06 04:21 / trs
Radium 226 precision (±)	3.4	pCi/Filter				E903.0	07/19/06 04:21 / trs
Thorium 230	15.4	pCi/Filter		0.4		E907.0	07/18/06 00:00 / df
Thorium 230 precision (±)	2.8	pCi/Filter				E907.0	07/18/06 00:00 / df
Uranium, Activity	114	pCi/Filter	D	8.0		SW6020	07/11/06 19:12 / sml

Report Definitions: RL - Analyte reporting limit.

QCL - Quality control limit.

D - RL increased due to sample matrix interference.

MCL - Maximum contaminant level.



Client:

Homestake Mining Co

Site Name:

Grants

Report Date: 08/04/06

Lab ID:

C06070040-007

Collection Date: Not Provided

Client Sample ID: Hmc-7

DateReceived: 07/03/06

Matrix:

Filter

Analyses	Result	Units	Qualifier	RL	MCL/ QCL	Method	Analysis Date / By
RADIONUCLIDES - TOTAL							
Radium 226	ND	pCi/Filter	D	0.4		E903.0	07/19/06 05:22 / trs
Thorium 230	ND	pCi/Filter	D	0.4		E907.0	07/18/06 00:00 / df
Uranium, Activity	1.0	pCi/Filter		0.2		SW6020	07/11/06 19:16 / sml

Report Definitions: RL - Analyte reporting limit.

QCL - Quality control limit.

D - RL increased due to sample matrix interference.

MCL - Maximum contaminant level.



CLIENT: HOMESTAKE MINING COMPANY - GRANTS, NEW MEXICO

REPORT DATE: May 13, 2006

SAMPLE ID: HMC 1

Quarter/Date Sampled Air Volume	Radionuclide	Concentration µCi/mL	Error Estimate µCi/mL	L.L.D. μCi/mL	Effluent Conc.* μCi/mL	% Effluent Concentration
C06040080-001	nat U	1.37E-16	N/A	1.00E-16	9.00E-14	1.52E-01
First Quarter 2006	²³⁰ Th	< 1.00E-16	2.08E-17	1.00E-16	√2.00E-14	< 5.00E-01
Air Volume in mLs	²²⁶ Ra	< 1.00E-16	1.67E-17	1.00E-16	9.00E-13	< 1.11E-02
1.44E+11						

C06070040-001	U ^{tan}	7.83E-16	N/A	1.00E-16	9.00E-14	8.70E-01
Second Quarter 2006	²³⁰ Th	1.78E-16	2.52E-17	1.00E-16	2.00E-14	8.92E-01
Air Volume in mLs	²²⁶ Ra	3.08E-16	3.64E-17	1.00E-16	9.00E-13	3.42E-02
1.43E+11		- ;				

N/A not applicable for ICP-MS

LLD = Lower Limit of Detection per Regulatory Guide 4.14

^{*}Effluent Concentrations per 10 CFR Part 20 Appendix B Table 2, Effluent Concentration



CLIENT: HOMESTAKE MINING COMPANY - GRANTS, NEW MEXICO

REPORT DATE: May 13, 2006

SAMPLE ID: HMC 2

Quarter/Date Sampled Air Volume	Radionuclide	Concentration μCi/mL	Error Estimate μCi/mL	L.L.D. μCi/mL	Effluent Conc.* μCi/mL	% Effluent Concentration
C06040080-002	nat U	1.45E-16	N/A	1.00E-16	9.00E-14	1.61E-01
First Quarter 2006	²³⁰ Th	1.38E-16	2.50E-17	1.00E-16	√2.00E-14	6.88E-01
Air Volume in mLs	²²⁶ Ra	< 1.00E-16	1.95E-17	1.00E-16	9.00E-13	< 1.11E-02
1.28E+11						

C06070040-002	^{nat} U	9.58E-16	N/A	1.00E-16	9.00E-14	1.06E+00
Second Quarter 2006	²³⁰ Th	1.34E-16	2.38E-17	1.00E-16	2.00E-14	6.71E-01
Air Volume in mLs	²²⁶ Ra	2.10E-16	3.15E-17	1.00E-16	9.00E-13	2.33E-02
1.43E+11						

N/A not applicable for ICP-MS

LLD = Lower Limit of Detection per Regulatory Guide 4.14

^{*}Effluent Concentrations per 10 CFR Part 20 Appendix B Table 2, Effluent Concentration



CLIENT: HOMESTAKE MINING COMPANY - GRANTS, NEW MEXICO

REPORT DATE: May 13, 2006

SAMPLE ID: HMC 3

Quarter/Date Sampled Air Volume	Radionuclide	Concentration μCi/mL	Error Estimate μCi/mL	L.L.D. μCi/mL	Effluent Conc.* μCi/mL	% Effluent Concentration
C06040080-003	nat U	3.75E-16	N/A	1.00E-16	9.00E-14	4.17E-01
First Quarter 2006	²³⁰ Th	1.10E-16	1.55E-17	1.00E-16	/2.00E-14	5.49E-01
Air Volume in mLs	²²⁶ Ra	1.48E-16	2.32E-17	1.00E-16	9.00E-13	1.64E-02
1.42E+11		 				

C06070040-003	^{nat} U	3.71E-15	N/A	1.00E-16	9.00E-14	4.12E+00
Second Quarter 2006	²³⁰ Th	3.13E-16	3.83E-17	1.00E-16	2.00E-14	1.56E+00
Air Volume in mLs	²²⁶ Ra	1.03E-15	6.92E-17	1.00E-16	9.00E-13	1.14E-01
1.33E+11						

N/A not applicable for ICP-MS

LLD = Lower Limit of Detection per Regulatory Guide 4.14

^{*}Effluent Concentrations per 10 CFR Part 20 Appendix B Table 2, Effluent Concentration



CLIENT: HOMESTAKE MINING COMPANY - GRANTS, NEW MEXICO

REPORT DATE: May 13, 2006

SAMPLE ID: HMC 4

Quarter/Date Sampled Air Volume	Radionuclide	Concentration μCi/mL	Error Estimate µCi/mL	L.L.D. μCi/mL	Effluent Conc.* μCi/mL	% Effluent Concentration
C06040080-004	nat U	1.48E-16	N/A	1.00E-16	9.00E-14	1.65E-01
First Quarter 2006	²³⁰ Th	< 1.00E-16	1.59E-17	1.00E-16	/ 2.00E-14	< 5.00E-01
Air Volume in mLs	²²⁶ Ra	< 1.00E-16	1.86E-17	1.00E-16	9.00E-13	< 1.11E-02
1.45E+11						

C06070040-004	nat U		2.77E-15	N/A	1.00E-16	9.00E-14		3.08E+00
Second Quarter 2006	²³⁰ Th		2.59E-16	3.59E-17	1.00E-16	2.00E-14		1.30E+00
Air Volume in mLs	²²⁶ Ra	<	1.00E-16	2.04E-17	1.00E-16	9.00E-13	<	1.11E-02
1.42E+11								

N/A not applicable for ICP-MS

LLD = Lower Limit of Detection per Regulatory Guide 4.14

^{*}Effluent Concentrations per 10 CFR Part 20 Appendix B Table 2, Effluent Concentration



CLIENT: HOMESTAKE MINING COMPANY - GRANTS, NEW MEXICO

REPORT DATE: May 13, 2006

SAMPLE ID: HMC 5

Quarter/Date Sampled Air Volume	Radionuclide	Concentra µCi/mI	Estimate	L.L.D. μCi/mL	Effluent Conc.* μCi/mL		% Effluent oncentration
C06040080-005	nat U	1.83E-	16 N/A	1.00E-16	9.00E-14		2.03E-01
First Quarter 2006	²³⁰ Th	< 1.00E-	16 1.96E-17	1.00E-16	/2.00E-14	<	5.00E-01
Air Volume in mLs	²²⁶ Ra	< 1.00E-	16 1.75E-17	1.00E-16	9.00E-13	<	1.11E-02
Air Volume in mLs 1,43E+11	226Ra	< 1.00E-	16 1.75E-17	1.00E-16	9.00E-13	<	1.11E-02

C06070040-005	^{nat} U	5.02E-15	N/A	1.00E-16	9.00E-14	5.58E+00
Second Quarter 2006	²³⁰ Th	1.03E-16	1.82E-17	1.00E-16	2.00E-14	5.14E-01
Air Volume in mLs	²²⁶ Ra	1.12E-16	2.24E-17	1.00E-16	9.00E-13	1.24E-02
1.43E+11						

N/A not applicable for ICP-MS

LLD = Lower Limit of Detection per Regulatory Guide 4.14

^{*}Effluent Concentrations per 10 CFR Part 20 Appendix B Table 2, Effluent Concentration



CLIENT: HOMESTAKE MINING COMPANY - GRANTS, NEW MEXICO

REPORT DATE: May 13, 2006

SAMPLE ID: HMC 6

Quarter/Date Sampled Air Volume	Radionuclide	Concentration μCi/mL	Error Estimate μCi/mL	L.L.D. μCi/mL	Effluent Conc.* μCi/mL	% Effluent Concentration
C06040080-006	nat U	1.05E-16	N/A	1.00E-16	9.00E-14	1.17E-01
First Quarter 2006	²³⁰ Th	< 1.00E-16	1.75E-17	1.00E-16	√2.00E-14	< 5.00E-01
Air Volume in mLs	²²⁶ Ra	< 1.00E-16	1.75E-17	1.00E-16	9.00E-13	< 1.11E-02

C06070040-006	^{nat} U	7.92E-16	N/A	1.00E-16	9.00E-14	8.80E-01
Second Quarter 2006	²³⁰ Th	1.07E-16	1.94E-17	1.00E-16	2.00E-14	5.35E-01
Air Volume in mLs	²²⁶ Ra	1.25E-16	2.36E-17	1.00E-16	9.00E-13	1.39E-02
1.44E+11						

N/A not applicable for ICP-MS

LLD = Lower Limit of Detection per Regulatory Guide 4.14

^{*}Effluent Concentrations per 10 CFR Part 20 Appendix B Table 2, Effluent Concentration



QA/QC Summary Report

Client: Homestake Mining Company
Project: Grants 1st Quarter 2006 Comp

Report Date: 05/18/06 Work Order: C06040080

Analyte	Result Units	RL	%REC	Low Limit	High Limit	RPD	RPDLimit	Qual
Method: E903.0							Bato	ch: 10643
Sample ID: C06040080-001AMS	Sample Matrix Spike			Run: BERTH	OLD 770_060	418A	04/18	/06 14:30
Radium 226	40.5 pCi/Filter	0.20	97	70	130			
Sample ID: C06040080-001AMSD	Sample Matrix Spike Duplicate			Run: BERTH	OLD 770_060	418A	04/18	/06 14:30
Radium 226	36.6 pCi/Filter	0.20	84	70	130	10	26.2	
Sample ID: MB-RA226-1493	Method Blank			Run: BERTHO	OLD 770_060	418A	04/18/	/06 14:30
Radium 226	ND pCi/L	0.2			1			
Sample ID: LCS-RA226-1493	Laboratory Control Sample			Run: BERTHO	OLD 770_060	418A	04/18/	/ 06 14:30
Radium 226	13.9pCi/L	0.20	110	70	130			
Method: E907.0							Batc	h: 10643
Sample ID: MB-R65140	Method Blank			Run: EGG-OR	RTEC_060418	BA	04/18/	06 10:00
Thorium 230	ND pCi/Filter	0.2						•
Sample ID: LCS-R65140	Laboratory Control Sample			Run: EGG-OR	TEC_060418	BA	04/18/	06 10:00
Thorium 230	6.30 pCi/Filter	0.20	129	70	130			
Sample ID: C06040080-003A MS	Sample Matrix Spike			Run: EGG-OR	TEC_060418	BA	04/18/	06 10:00
Thorium 230	40.8 pCi/Filter	0.20	102	70	130			
Sample ID: C06040080-003A MSD	Sample Matrix Spike Duplicate	•		Run: EGG-OR	TEC_060418	BA	04/18/	06 10:00
Thorium 230	43.8 pCi/Filter	0.20	115	70	130	7.1	30	
Method: SW6020					<u> </u>		Batc	h: 10643
Sample ID: MB-10643	Method Blank			Run: ICPMS2-	C_060407A		04/07/0	06 22:38
Uranium	0.0001 mg/filter	6E-05						
Uranium, Activity	0.09 pCi/Filter	0.04					•	,
Sample ID: LCS1-10643	Laboratory Control Sample			Run: ICPMS2-			04/07/	06 22:42
Uranium	0.0552 mg/filter (0.00030	110	75	125			
Sample ID: C06040101-001AMS	Sample Matrix Spike			Run: ICPMS2-	C_060407A		04/08/0	06 00:24
Uranium	0.0767 mg/filter (0.00030	99	75	125			
Sample ID: C06040101-001AMSD	Sample Matrix Spike Duplicate			Run: ICPMS2-	C_060407A		04/08/0	06 00:28
Uranium	0.0780 mg/filter 0	0.00030	102	75 .	125	1.6	20	

Qualifiers:

RL - Analyte reporting limit.



QA/QC Summary Report

Client: Homestake Mining Co

Report Date: 08/04/06

Project: Grants 2nd Quarter 2006 Comp

Work Order: C06070040

Analyte	Result	Units	RL	%REC	Low Limit	High Limit	RPD	RPDLimit	Qual
Method: E903.0				**=				Batch: RA	1226-1620
Sample ID: C06061360-001ADUP Radium 226 Radium 226 precision (±)	Sample Duplic 8.5E-05 5.0E-06	cate uCi/kg uCi/kg	5.0E-08		Run: TENN	NELEC-2_060711/	A 11	07/18 22.1	3/06 19:11
Sample ID: C06070040-001AMS Radium 226	Sample Matrix 113	Spike pCi/Filter	0.42	110	Run: TENN 70	IELEC-2_060711/ 130	Ą	07/18	3/06 23:19
Sample ID: MB-RA226-1620 Radium 226	Method Blank ND	pCi/L	0.2		Run: TENN	IELEC-2, 060711/	A	07/19	9/06 14:26
Sample ID: LCS-RA226-1620 Radium 226	Laboratory Con	ntrol Sample pCi/L	0.20	103	Run: TENN 70	IELEC-2_060711/ 130	4	07/19	9/06 16:27
Method: E907.0								Batch	n: R69408
Sample ID: LCS-R69408 Thorium 230	Laboratory Co. 3.90	ntrol Sample pCi/Filter	0.20	80	Run: EGG- 70	ORTEC_060718A 130		07/18	3/06 00:00
Sample ID: C06070040-002AMS Thorium 230	Sample Matrix 79.8	Spike pCi/Filter	0.40	124	Run: EGG- 70	ORTEC_060718A 130		07/18	3/06 0 0:00
Sample ID: C06070040-002AMSD Thorium 230	•	Spike Duplicate pCi/Filter	0.40	92	Run: EGG- 70	ORTEC_060718A 130	22	07/18 30	/06 00:00 ·
Sample ID: MB-R69408 Thorium 230	Method Blank ND	pCi/Filter	0.2		Run: EGG-	ORTEC_060718A		07/18	i/06 00:00
Method: SW6020								Bate	ch: 11447
Sample ID: MB-11447 Uranium Uranium, Activity		mg/filter pCi/Filter	6E-05 0.04		Run: ICPM	S2-C_060711A		07/11	/06 18:23
Sample ID: LCS1-11447 Uranium	Laboratory Cor 0.0514	ntrol Sample mg/filter	0.00030	103	Run: ICPM: 75	S2-C_060711A 125		07/11	/06 18:27
Sample ID: C06070045-007AMS Uranium	Sample Matrix 0.0561	Spike mg/filter	0.00030	103	Run: ICPM: 75	S2-C_060711A 125		07/11	/06 20:13
Sample ID: C06070045-007AMSD Uranium	•	Spike Duplicate mg/filter	0.00030	102	Run: ICPMS 75	S2-C_060711A 125	1.4	07/11 20	/06 20:17

Qualifiers:

RL - Analyte reporting limit.



QA/QC Summary Report

Client: Homestake Mining Co

Report Date: 08/04/06

Project: Grants 2nd Quarter 2006 Comp

Work Order: C06070044

Analyte	Result	Units	RL	%REC	Low Limit	High Limit	RPD	RPDLimit	Qual
Method: E903.0								Batch: RA	226-1620
Sample ID: C06061360-001ADUP	Sample Duplic	cate			Run: TENN	IELEC-2_060711	Α	07/18	/06 19:1
Radium 226	8.5E-05	uCi/kg	5.0E-08				11	22.1	
Radium 226 precision (±)	5.0E-06	uCi/kg							
Sample ID: C06070040-001AMS	Sample Matrix	Spike			Run: TENN	ELEC-2_060711	Α	07/18	/06 23:19
Radium 226	113	pCi/Filter	0.42	110	70	130			
Sample ID: MB-RA226-1620	Method Blank				Run: TENN	ELEC-2_060711	A	07/19	/06 14:26
Radium 226	ND	pCi/L	0.2			•			
Sample ID: LCS-RA226-1620	Laboratory Co	ntrol Sample			Run: TENN	ELEC-2_060711	Α	07/19	/06 16:27
Radium 226	33	pCi/L	0.20	103	70	130			
Method: E907.0								Batch	: R69408
Sample ID: LCS-R69408	Laboratory Co	ntrol Sample			Run: EGG-	ORTEC_060718	A	07/18	/06 00:00
Thorium 230	3.90	pCi/Filter	0.20	80	70	130			
Sample ID: C06070040-002AMS	Sample Matrix	Spike			Run: EGG-	ORTEC_060718.	4	07/18	/06 00:00
Thorium 230	79.8	pCi/Filter	0.40	124	70	130			
Sample ID: C06070040-002AMSD	•	Spike Duplicate	:		Run: EGG-	ORTEC_060718	Ą	07/18	/06 00:00
Thorium 230	64.2	pCi/Filter	0.40	92	70	130	22	30	•
Sample ID: MB-R69408	Method Blank				Run: EGG-	ORTEC_060718	Ą	07/18	/06 00:00
Thorium 230	ND	pCi/Filter	0.2						
Method: SW6020								Bato	h: 11447
Sample ID: MB-11447	Method Blank				Run: ICPM	S2-C_060711A		07/11	/06 18:23
Uranium	7E-05	mg/filter	6E-05						
Jranium, Activity	0.05	pCi/Filter	0.04						
Sample ID: LCS1-11447	Laboratory Co	ntrol Sample			Run: ICPM	S2-C_060711A		07/11	/06 18:27
Jranium	0.0514	mg/filter	0.00030	103	75	125			
Sample ID: C06070045-007AMS	Sample Matrix	Spike			Run: ICPM	S2-C_060711A		07/11	/06 20:13
Jranium	0.0561	mg/filter	0.00030	103	75	125			
Sample ID: C06070045-007AMSD	Sample Matrix	Spike Duplicate			Run: ICPM	S2-C_060711A		07/11/	06 20:17
Jranium	0.0553	mg/filter	0.00030	102	75	125	1.4	20	

Qualifiers:

RL - Analyte reporting limit.

Attachment 2 - Radon Gas Monitoring Results

Attachment 2 - Radon Gas Monitoring Results Track-Etch Passive Survey

Location	Monitoring Period	Rn Concentration (µCi/ml)	Error Estimate (µCi/ml)	% Limit* (%)	LLD (μCi/ml)
Hi-Vol #1	12/28/2005 - 6/29/2006	(розли)		(,0)	(μοι/)
N Outer Perimeter	12/20/2003 - 0/29/2000	1.2E-09	1.4E-10	12	1.6E-10
Hi-Vol #2	12/28/2005 - 6/29/2006				
NE Outer Perimeter	12/28/2003 - 0/29/2000	1.7E-09	1.7E-10	17	1.6E-10
Hi-Vol #3	12/28/2005 - 6/29/2006				-
E Outer Perimeter	12/20/2003 - 0/29/2000	1.1E-09	1.4E-10	11	1.6E-10
Hi-Vol #4	12/28/2005 - 6/29/2006				
S Outer Perimeter	12/20/2005 - 0/29/2000	2.2E-09	2.0E-10	22	1.6E-10
Hi-Vol #5	12/28/2005 - 6/29/2006				
N of Nearest Residence	12/20/2005 - 0/29/2000	2.1E-09	2.0E-10	21	1.6E-10
Hi-Vol #6	12/28/2005 - 6/29/2006		•		
W of Outer Perimeter	12/20/2003 - 0/29/2000	1.1E-09	1.4E-10	11	1.6E-10
HMC #7	12/28/2005 - 6/29/2006			, , , , , , , , , , , , , , , , , , ,	
S Boundary	12/20/2003 - 0/29/2000	1.2E-09	1.5E-10	12	1.6E-10
HMC #16	12/28/2005 - 6/29/2006				
Background	12/20/2003 - 0/29/2000	1.0E-09	1.3E-10	10	1.6E-10

^{*}Limit of 1E-8 µCi/ml for radon-222 with daughters removed as given in 10 CFR20, Appendix B, Table 2

Attachment 3 - Environmental Gamma Radiation Results

Attachment 3 - Environmental Gamma Radiation Results OSL Perimeter Survey

Direct Radiation Measurements

Location	Monitoring Period	Exposure Rate (mrem/6 mo)	Error (mrem/6 mo)*		
Hi-Vol #1					
N Outer Perimeter	1/1/2006 - 6/30/2006	9	0.9		
Hi-Vol #2	-				
NE Outer Perimeter	1/1/2006 - 6/30/2006	16	1.6		
Hi-Vol #3					
E Outer Perimeter	1/1/2006 - 6/30/2006	7 /	0.7		
Hi-Vol #4					
S Outer Perimeter	1/1/2006 - 6/30/2006	9	0.9		
Hi-Vol #5					
N of Nearest Residence	1/1/2006 - 6/30/2006	17	1.7		
Hi-Vol #6					
W of Outer Perimeter	1/1/2006 - 6/30/2006	7	0.7		
#16					
Background	1/1/2006 - 6/30/2006	11	1.1		

^{*}Error is 1.96 std. dev.