

October 26, 2006

Mr. Dan E. Burnham, Technical Consultant
ExxonMobil Refining & Supply Company
3225 Gallons Road
Fairfax, VA 22037

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - LICENSE AMENDMENT
REQUEST FOR REDUCTION IN GROUND WATER MONITORING -
HIGHLAND RECLAMATION PROJECT (TAC LU0131)

Dear Mr. Burnham:

By letter dated May 18, 2006, ExxonMobil Refining & Supply Company (ExxonMobil) submitted a License Amendment Request to reduce the ground water sampling program at its Highland Reclamation Project. The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the document and finds that it needs additional information in order to complete its review. The information needed is identified in the enclosure.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice for Domestic Licensing Proceedings and Issuance of Orders," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's Agencywide Document Access and Management System (ADAMS). The ADAMS system is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions concerning this letter, please contact me at: (301)-415-6629, or via e-mail, to mhf1@nrc.gov.

Sincerely,

/RA/

Myron Fliegel, Senior Project Manager
Decommissioning and Uranium Recovery
Licensing Directorate
Division of Waste Management
and Environmental Protection
Office of Federal and State Materials
and Environmental Management Programs

Docket No.: 40-8102
License No.: SUA-1139

Enclosure: Request for Additional Information

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**REQUEST FOR ADDITIONAL INFORMATION
HIGHLAND RECLAMATION PROJECT**

License Amendment Request for Reduction in Ground Water Monitoring, May 18, 2006

1. ExxonMobil requested that the requirement for monitoring ground water at wells 015, 017, 127, 148, 177, and 180 be deleted from the license. ExxonMobil stated that those six wells are dry. In order for us to evaluate this request, please provide the following:
 - a. Provide a graphical and/or tabular summary of water level data for wells 015, 117, 127, 148, 177 and 180 to establish the entire time period these wells have been dry.
 - b. Provide a stratigraphic cross-section(s) that shows the location of well screens for wells 015, 117, 127, 148, 177 and 180 with respect to important site features (e.g., the bottom of the tailings basin) and, if possible, with respect to the current depth of the ground water mound around the reclaimed tailings impoundment.
 - c. Provide a detailed narrative describing the action(s) to be implemented on monitor wells 015, 017, 127, 148, 177, and 180 upon elimination from the license (e.g., surface capping, subsurface sealing, removal from subsurface, etc.)

2. ExxonMobil requested that two of the four wells used to define background be deleted from the license, stating that the remaining two wells will be adequate to define background. In order for us to evaluate this request, please provide the following:
 - a. Provide a ground water contour map that shows the upgradient location of wells 134, 172, 174, and 182 with respect to important site features including the tailings basin, pits, reservoirs, and spoil piles.
 - b. As a supplement to Figures 2 through 4, provide a statistical or other analysis of ground water quality data for all tested parameters from wells 134, 172, 174, and 182 to support the assertion that the existing data from wells 134 and 174, along with continuing data from wells 172 and 182, is adequate to define background ground water quality conditions.
 - c. Provide a detailed narrative describing the action(s) to be implemented on monitor wells 134 and 174 upon elimination from the license (e.g., surface capping, subsurface sealing, removal from subsurface, etc.)

3. ExxonMobil requested that the requirement for monitoring ground water at wells 120, 179, and 183 be deleted from the license. ExxonMobil stated that those three wells do not provide any additional information than well 176. In order for us to evaluate this request, please provide the following:
 - a. Provide a ground water contour map that shows the hydraulic relationship among wells 120, 179, 183 and 176 with respect to each other and with important site features, including the tailings basin and spoil piles.
 - b. Provide a stratigraphic cross-section(s) that shows the location of well screens for wells 120, 179, 183 and 176 with respect to each other and with important site features, including the tailings basin and spoil piles.

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- c. As a supplement to Figures 5 through 7, provide a statistical or other analysis of ground water quality data for all tested parameters from wells 120, 179, 183 and 176 to support the assertion that wells 120, 179, and 183 “do not provide any additional data and can be eliminated from the monitoring program with no impact.”
 - d. Provide a detailed narrative describing the action(s) to be implemented on monitor wells 120, 179, and 183 upon elimination from the license (e.g., surface capping, subsurface sealing, removal from subsurface, etc.)
4. ExxonMobil requested that the requirement for monitoring ground water at well 114 be deleted from the license. ExxonMobil stated that this well does not provide any additional information than well 175. In order for us to evaluate this request, please provide the following:
 - a. Provide a stratigraphic cross-section that shows the location of well screens for wells 114 and 175 with respect to each other and with important site features ,including the tailings basin and spoil piles.
 - b. As a supplement to Figures 8 through 10, provide a statistical or other analysis of ground water quality data for all tested parameters from wells 114 and 175 to support the assertion that well 114 “can be eliminated from the monitoring program with no impact.”
 - c. Provide a detailed narrative describing the action(s) to be implemented on monitor well 114 following elimination from the license (e.g., surface capping, subsurface sealing, removal from subsurface, etc.)
5. ExxonMobil requested that the required frequency of monitoring ground water at the various wells be revised in the license. In order for us to evaluate this request, please provide a statistical or other analysis of ground water quality data for all tested parameters to support the assertion that “the last five years of data have indicated that changes in water quality are very small and the changes occur slowly.” As indicated in the quote, such an analysis should include a temporal component. In addition, the analysis should address the time period in which “hazardous constituents in non-POC wells have been below detection and well below any standards” and the basis for the short list of indicator parameters proposed for wells 112, 116, 128, 129, 171, 172, 173, 178 and 181.