

CORRESPONDENCE REGARDING  
WILDLIFE MONITORING  
ACCOMPANYING COGEMA MINING, INC.  
SUBMITTAL TO THE US NRC  
JULY 17, 2009

SUA-1341  
DOCKET NO. 40-8502



The State  
of Wyoming



## Department of Environmental Quality

Jim Geringer, Governor

1043 Coffeen Avenue, Suite D • Sheridan, Wyoming 82801

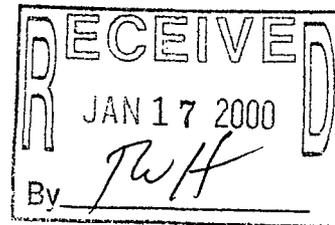
AIR QUALITY  
(307) 672-6457  
Fax (307) 674-6050

LAND QUALITY  
(307) 672-6488  
Fax (307) 672-2213

WATER QUALITY  
(307) 672-6457  
Fax (307) 674-6050

January 14, 2000

Mr. Thomas Hardgrove  
COGEMA Mining, Inc.  
P. O. Box 730  
Mills, WY 82644



**RE: Irigaray-Christensen Operations, Permit No. 478, Wildlife Monitoring Revision,  
TFN 3 6/303**

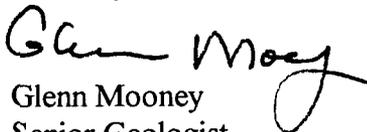
Dear Mr. Hardgrove:

I have reviewed your December 29, 1999, request to discontinue wildlife monitoring at the Irigaray and Christensen Ranch operations. I have also requested and received a review of your proposal from the Wyoming Game and Fish Department.

In the attached memo and letter you will find that your application is acceptable and complete with the exception of one additional item. A revision Form 11 must be completed in duplicate and returned to this office. Forms for your use are attached.

Please feel free to call me if you have any questions.

Sincerely,

  
Glenn Mooney  
Senior Geologist

\gm

Attachments

cc: R. Chancellor *w/encl.*  
NRC-MD *w/encl.*

478wldr.v.0gm

## MEMORANDUM

**TO:** File, COGEMA Mining's Irigaray-Christensen Ranch ISL Operations,  
Permit No. 478

**FROM:** Glenn Mooney *GM*

**DATE:** January 14, 2000

**SUBJECT:** Review of Wildlife Monitoring Revision, TFN 3 6/303

### Introduction

In letter dated December 22, 1999, Tom Hardgrove of COGEMA Mining, Inc. (COGEMA) submitted an application to discontinue wildlife monitoring at their Irigaray and Christensen Ranch uranium isl operations.

### Review

1. Index of Changes

An Index of Changes page was supplied. It correctly showed the changes proposed for the permit document.

No response is required.

2. Wyoming Game and Fish Department Concurrence

I sent a letter on December 29, 1999, to Tom Collins of the Wyoming Game and Fish Department (Game and Fish) asking for his review of the application. A copy of the proposed changes was included in my letter.

In a letter dated January 10, 2000, Mr. Collins replied and stated that Game and Fish concurred with the proposed change and recommended that the Wyoming Department of Environmental Quality approve the change. A copy of his letter is attached.

3. Permit Change

The revision simply consists of eliminating two lines on Page 2-37 in the list of wildlife monitoring studies. COGEMA will continue to monitor sage grouse strutting grounds and carry out raptor surveys and searches for new nests.

No response is required.

**COGEMA Review Memo**

**TFN 3 6/303**

**January 14, 2000**

**Page No. 2**

4. Form 11

In his August 12, 1999, letter to Marion Loomis of the Wyoming Mining Association, Richard Chancellor, Land Quality Division Administrator, stated that applications to reduce wildlife monitoring at mines would be processed as Land Quality Division NonCoal Rules and Regulation Chapter VII permit revisions required completion of a revision Form 11.

Two Form 11's are included for COGEMA's use.

**Conclusion**

Review of this revision application found it satisfactory. The one remaining item was the need for completion of a revision Form 11.

\gm

Enclosures

478wlr.v.0gm

WYOMING  
GAME AND FISH DEPARTMENT



"Conserving Wildlife — Serving People"

TFN 3 6/303  
BG SP DE MI  
GM JS KK DC  
KN VB LB MR

January 10, 2000

WER 0037  
Department of Environmental Quality  
Land Quality Division  
COGEMA Mining Inc.'s Irigaray and Christensen  
Ranch ISL Operation Revision Application,  
Pending TFN, Permit No. 478  
Johnson County

Glenn Mooney  
Senior Geologist  
Department of Environmental Quality  
Land Quality Division  
1043 Coffeen Avenue, Suite D  
Sheridan, WY 82801



Dear Mr. Mooney:

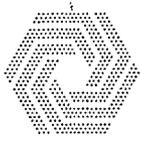
The Wyoming Game and Fish Department concurs with the proposed elimination of COGEMA's annual big game monitoring, and recommends the Wyoming Department of Environmental Quality approve the changes.

Thank you for the opportunity to comment. If you have any questions, please contact Vern Stelter at 307-777-4587.

Sincerely,

Thomas C. Collins  
Coordinator  
Office of Director  
Habitat Protection Program

TC:as  
cc: USFWS



**COGEMA**  
Mining, Inc.

February 15, 2000

Mr. Glenn Mooney  
Senior Geologist  
Land Quality Division  
Wyoming Department of Environmental Quality  
1043 Coffeen Ave., Suite D  
Sheridan, Wyoming 82801

**RE: TFN 3 6/303, Wildlife Monitoring at Irigaray and Christensen Ranch,  
Mine Permit No. 478**

Dear Mr. Mooney:

Enclosed please find two modified text pages (three sets) for the Permit to Mine No. 478 Update, dated January 5, 1996. As we discussed, the revised pages now reflect not only the permanent discontinuation of big game surveys, but also the suspension of the remainder of the wildlife monitoring program. The raptor nesting surveys and sage grouse lek surveys would be discontinued unless there is a resumption of mining at some future date. As we have previously indicated, current mining activity will end during the current year, and all remaining activity at the sites will be focused upon aquifer restoration and site decommissioning. In the event that there is a change that calls for a resumption of mine development, the raptor and sage hen surveys would be resumed. Assuming timely approval, we would not conduct any wildlife surveys during the current year.

There is language in the enclosed revision that commits COGEMA Mining, Inc. to survey for the existence of raptor nesting activity in areas that have not seen significant surface activity (surface reclamation or other similar activity) in the year prior to the initiation of such activity. Routine wellfield maintenance relating to aquifer restoration would not be considered significant surface activity. We anticipate that such surveys would likely be conducted by company personnel. In the event that new raptor nesting is occurring in such an area, we will confer with the Wyoming Fish and Game Department and the U. S. Fish and Wildlife Service regarding the timing of our planned activity or possible mitigation prior to starting the work.



Also enclosed is an index sheet for the proposed changes and two copies of Form 11. Note that Form 11 also reflects recent changes in company management. Please call me if you have any questions.

Sincerely,

T. W. Hardgrove  
Manager, Environmental and Regulatory Services

Enclosures

cc: USNRC/Headquarters  
USNRC/Region IV (cover letter only)  
Pat Tibert, USFWS, Cheyenne  
COGEMA-D. L. Wichers, W. W. Heili, C. W. Toal, J. M. Vaselein

on the Christensen Ranch permit area during the fall of 1986 and spring of 1987. Principal tasks were to identify major vegetation types, determine vegetative species composition and estimate vegetative cover and frequency. A composite reference area not to be disturbed by mining was selected as the basis for determining success of reclamation after mining. There were eight vegetation and land use types identified by the study and a total of 258 plant species identified on the study area. Vegetation in the permit area and one-half mile adjacent to it was mapped. There were no threatened or endangered plant species observed, however, seven noxious weed species and five primary selenium indicator species were encountered. A discussion of the grazing history on the study area was included. Results of the vegetation study are provided for review in appendix D8 of the Christensen Ranch permit application.

In the original Irigaray permit application (1977), quantitative vegetation baseline data was not available for the permit area. Much of the permitted area was previously disturbed, therefore vegetation data from a study in T44N, R77W was presented. In 1979, a new vegetation study was performed on and adjacent to the Irigaray permit area. The study area encompassed approximately 4,700 acres within and adjacent to the permit area. Quantitative baseline data included cover, production density, species composition and frequency. Reference areas were also established. The results of this study are included in Appendix D8 of the Irigaray permit application, Attachment D-6.

A four season baseline wildlife study was conducted on the Christensen Ranch permit area and adjacent areas to evaluate any potential adverse impacts to the native fauna. The only species of commercial value in the vicinity are domestic, principally range cattle. Wildlife species with some recreational value include the pronghorn antelope, mule deer, cottontail rabbit, sage grouse and mourning dove, which are hunted. Non-game species are typical of the sage brush grassland habitat in the region. Searches for threatened and endangered wildlife were conducted. The only potential conflict identified was with the nesting site of a golden eagle pair, a species of high Federal interest. A special study was commissioned in 1987 to evaluate the potential for mining activities conflicting with the eagle pair. The results of the wildlife baseline study and golden eagle study are included in Appendix D9, as are discussions of other potential impacts and mitigation measures for wildlife during the mining operation.

Wildlife species at the Irigaray project site are very much the same as found on the Christensen project site, and are described in detail in appendix D9 of the Irigaray permit application.

COGEMA has annually conducted wildlife surveys on and proximate to the permit area for a number of years. The surveys consisted of big game surveys, sage grouse lek censuses, and nesting raptor surveys. The accumulated data show no impacts attributable to the mine operations. Due to the termination of mining activities and the initiation of restoration/reclamation activities exclusively, all wildlife monitoring has been suspended. The big game surveys are permanently terminated. If mining resumes at a future date, then COGEMA will reinstate the sage grouse and raptor surveys. During restoration and site reclamation, if significant surface reclamation activities are planned

in an area that has not experienced any significant activity in the previous year, the area will be initially checked for raptor nesting prior to the reclamation activities. Previously undocumented raptor nesting in such an area will be reported immediately to the agencies. In such cases the timing of reclamation activities and/or possible mitigation will be resolved in advance with the agencies.

The Irigaray and Christensen Ranch 1995 Wildlife Monitoring Report, prepared for COGEMA by Powder River Eagle Studies, Gillette, WY, provides a summary of all wildlife surveys conducted on the properties since 1987. This report is contained in the 1995 Annual Report to the Wyoming DEQ, copies sent to NRC, dated August 18, 1995. In summary, no impacts to wildlife have been noted which can be attributed to the mining operations.

## 2.8.2 AQUATIC ECOLOGY

There is very little potential for aquatic life on the Irigaray and Christensen Ranch areas due to the intermittent and ephemeral nature of the drainage and relatively little surface water in the form of lakes or ponds. Two species of minnows, the plains minnow, hybognathus placitus, and flathead minnow, Pimephales promelas, were trapped from the Willow Creek drainage in the northwest portion of the Christensen Ranch permit area. There are no known species of game fish in the immediate vicinity. Other aquatic life either observed or which could potentially occur on the area are listed in appendix D9 of the Christensen Ranch permit application.

## 2.9 BACKGROUND RADIOLOGICAL CHARACTERISTICS

This section contains a summary of the environmental sampling program that was used to assess radiological background conditions in the vicinity of the Christensen Ranch permit area. The results of the Christensen program are included as there are more recent and in greater detail than background sampling at the Irigaray site. The pre-mining program included samples of the air, groundwater, surface water, soils, sediments, flora and fauna. The pre-mining data indicate that the existing concentrations of the radionuclides are in the range reported in similar studies.

Detailed information on the background radiological characteristics of the Christensen Ranch permit areas can be reviewed in Appendix D10. Available data from Irigaray are included in Appendix D10 of the Irigaray permit application. Operational radiological data obtained since 1987 (for Irigaray) and since 1989 (Christensen) are found in Section 5.0 of this renewal document.

### 2.9.1 AIR SAMPLING PROGRAM

The pre-operational background air monitoring data include four quarters of sampling at six Christensen Ranch locations beginning in December 1986. It evaluated the

cc: WNH  
JMV  
CWT  
File: 5.1.8



THE STATE OF WYOMING

JIM GERINGER  
GOVERNOR

## Department of Environmental Quality

Herschler Building ● 122 West 25th Street ● Cheyenne, Wyoming 82002

ADMINISTRATION (307) 777-7758 FAX 777-7682	ABANDONED MINES (307) 777-6145 FAX 634-0799	AIR QUALITY (307) 777-7391 FAX 777-5616	INDUSTRIAL SITING (307) 777-7368 FAX 777-6937	LAND QUALITY (307) 777-7756 FAX 634-0799	SOLID & HAZARDOUS WASTE (307) 777-7752 FAX 777-5973	WATER QUALITY (307) 777-7781 FAX 777-5973
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May 16, 2000

Mrs. Donna Wichers  
COGEMA Mining, Inc.  
P. O. Box 730  
Mills, WY 82644

**RE: Irigaray-Christensen Operations, Permit No. 478, Approval of Wildlife Monitoring Revision, TFN 3 6/303, Change No. 30**

Dear Mrs. Wichers:

This letter approves your minor revision which deletes references to big game aerial surveys in discussion of annual wildlife surveys. The LQD staff reviewed this application and found it acceptable.

Receipt of this letter grants COGEMA Mining Inc. permission to change your mine plan as described. In the event that revisions other than those listed on the Index of Changes inadvertently occurred within this package, those revisions are not automatically considered approved.

The LQD tracks this REVISION as Change No. 30.

If you have questions, please contact me (777-7046) or Glenn Mooney in the Sheridan District III Office (672-6488).

Sincerely,

*Richard A. Chancellor*  
Richard A. Chancellor  
Administrator  
Land Quality Division

RAC:gm  
xc: Ramona Christensen  
District III