



# Department of Environmental Quality

To protect, conserve and enhance the quality of Wyoming's environment for the benefit of current and future generations.



Dave Freudenthal, Governor

John Corra, Director

August 25, 2009

Mr. Richard Chang,  
Special Projects Branch,  
U.S. Nuclear Regulatory Commission,  
11545 Rockville Pike,  
Rockville, MD 20852

RE: Draft Environmental Assessment for Western Nuclear Split Rock Site.

Dear Mr. Chang:

We have reviewed the above referenced draft EA dated August 12, 2009. We have a few comments on the draft which are provided below. We look forward to reviewing the final EA and may have more comments at that time.

In general we agree with Western Nuclear's request for a new Alternate Concentration Limit (ACL) for selenium and uranium, which is the purpose of this EA. The EA did not discuss monitoring of any point of exposure (POE) wells or other receptors (e.g., surface water bodies). We believe that POEs should be monitored to ensure that any contamination that is identified at the POCs are attenuating as predicted/modeled and that the POCs are located properly to intercept the migration of contaminants. This issue should be included in the EA.

On page 3, third bullet, groundwater standards are discussed. We are not sure if you are aware, but the Water Quality Division (WQD) has "Class of Use" designations for groundwater that include standards for certain compounds. Our regulations do not allow a change in the class of use of an aquifer without a permit. This is how we regulate various compounds that do not have a drinking water standard. We believe that you should reference our Chapter 8, Water Quality Rules and Regulations for Class of Use along with the EPA Risk Based Standards

In the first paragraph of Section 3.3.2, there is a discussion of the location of water supply wells. The Draft EA states "These wells are located west of the site and outside of the IC areas." We are not sure that the term IC areas is appropriate here. The point of the paragraph seems to be location in relation to contamination. So perhaps language such as "the wells are located cross gradient or up gradient of the groundwater plumes" would be more appropriate.

In Section 3.3.2.1 the term "the Green Mountains" is used. To clarify, there are two mountains located just south of Jeffery City. The one to the east of Crooks Gap (the gravel county road going south of Jeffery City), is called Green Mountain and the one to the west is called Crooks Mountain. We are not



sure if you intended to refer to them both or just Green Mountain.

A map of the long term monitoring wells, including the POC and POE wells should be included in the EA. The locations of background groundwater wells and the upstream Sweetwater River sampling locations should also be identified. Providing the background values for uranium on a map would help clarify the issue of the high levels in the former Red Mule subdivision area as mentioned on page 14, Section 4.3.

In a related comment, the source of the background values published in Table 1 would be beneficial to the reader. A map and table of background concentrations would help greatly.

Will the technical evaluation report mentioned at the bottom of page 11 be available to the WDEQ and/or the general public for review or reference?

In Section 4.3, the attenuation of selenium is discussed. As mentioned in a previous comment, the POE wells should be monitored to ensure the modeled attenuation is actually occurring.

The WDEQ appreciates the opportunity to review this draft EA. Please contact me at 307/335-6959 or at the address provided if you have any questions or concerns on these comments.

Sincerely,



Mark Thiesse  
West District Supervisor  
Groundwater Program  
Water Quality Division

cc: Mr. Kevin Frederick, WQD/Groundwater Section Manager, Cheyenne  
File (2): Western Nuclear, Split Rock Mill, Fremont / Chronological