

Shroff, Behram

From: Mike Griffin (USA - Casper) [Mike.Griffin@uranium1.com]
Sent: Monday, September 21, 2009 9:13 AM
To: Shroff, Behram
Cc: Jon Winter (USA - Casper); Mandeville, Douglas
Subject: RE: Any info on Ecological Monitoring?
Attachments: image001.jpg

Behram:

There are no plans for operational vegetation monitoring if the proposed program in the application is accepted by NRC. In new Section 6.2 which was filed in response to the RAI, EMC proposes no operational vegetation sampling in accordance with footnote o to Table 2 of Reg Guide 4.1.4, which states that *"vegetation and forage sampling need be carried out only if dose calculations indicate that the ingestion pathway from grazing animals is a potentially significant exposure pathway..."* defined as a pathway which would expose an individual to a dose in excess of 5% of the applicable radiation protection standard (i.e., 5 mrem/year). This pathway was evaluated by MILDOS-Area and is discussed in Section 4.12.2 of the ER.

Section 3.5.5.1.1 discusses preoperational vegetation studies and defines an extended reference area (EXREFA). This is an area that is undisturbed by mining activities and is used to determine the success of revegetation activities and is a requirement of the WDEQ. The WDEQ will monitor the success of revegetation, both after wellfield installation and after decommissioning. However, this is not a monitoring activity performed by EMC. Jon may be able to provide you with more detail on this WDEQ requirement...I am not too familiar with how it is actually applied at an operation ISR.

Let me know if you need any further information. I will be in Cheyenne Monday through Wednesday of this week but can be reached by email and my cell.

Mike

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EX 6

E/7

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From: Shroff, Behram [mailto:Behram.Shroff@nrc.gov]

Sent: Sunday, September 20, 2009 3:12 PM

To: Mike Griffin (USA - Casper)

Cc: Jon Winter (USA - Casper)

Subject: Any info on Ecological Monitoring?

Specifically vegetation. The TR does include Wildlife in 6.3.1. Thanks