

September 22, 2011

Ms. Mary Hopkins  
Wyoming State Historic  
Preservation Officer  
Wyoming State Historic  
Preservation Office  
2301 Central Avenue, Barrett Building  
3rd Floor  
Cheyenne, WY 82002

SUBJECT: INITIATION OF SECTION 106 PROCESS FOR THE PROPOSED  
EXXONMOBIL LICENSE AMENDMENT

Dear Ms. Hopkins:

The U.S. Nuclear Regulatory Commission's (NRC's) staff is considering a license amendment application submitted by ExxonMobil for its radioactive materials license SUA-1139 at the former Highland uranium mill facility (Highland site). The amendment request involves changes to the Highland site's ground water monitoring program including changing the Points of Compliance and Points of Exposure monitoring wells and an increase to the alternate concentration limits at these wells. In addition, ExxonMobil has proposed a significant increase to the Highland site's long-term care boundary (see enclosed site maps). It should be noted that the amendment request does not contain any proposed intrusive work (e.g., digging or moving of soil) or the installation of any new monitoring wells. The license amendment application can be found in NRC's Agency-wide Documents Access and Management System (ADAMS) under package number ML111360415. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

As background, the Highland site is located in Converse County about 35 miles north of Douglas Wyoming. The Highland site is contained in Sections 17, 19, 20, 21, 22, 27, 28, 29 and 30 of T36N, R72W, and Sections 23 and 24 of T36N, R73W. It encompasses about 1,750 acres and has been historically disturbed by the mining of uranium, particularly the digging of open pits, and the placement of mill tailings waste in a dam. These activities occurred approximately between 1973 and 1984. In 1999, the milling site was reclaimed with the construction of a radon barrier over the mill tailing impoundment. A large Pit Lake, associated with historical uranium mining operations, is at the western edge of the site. The license amendment under consideration proposes an expansion of the current long-term care boundary to encompass the Pit Lake. Some underground seepage from the mill tailings to the southeast necessitated the purchase of 160 acres from the Boner Brothers which will also be included in the long-term care boundary.

From the initial Environmental Impact Statement prepared for the Highland site, the nearest historic landmark listed in the National Register of Historic Sites is Fort Fetterman about 15 miles south. The Glenrock Buffalo Jump, about two miles west of the Glenrock Interchange on I-25 is about 30 miles southwest of the Highland site. Neither landmark was affected by the Highland uranium mill.

M. Hopkins

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As required by 36 CFR 800.4(a), the NRC is requesting the views of the State Historical Preservation Officer on further actions to identify historic properties that may be affected by the NRC's proposed action (i.e., granting the proposed license amendment to the ExxonMobil Facility). Any information you provide will be used to document affects in accordance with 36 CFR 800.4(d). After assessing the information provided by you, we will determine what additional actions are necessary to comply with the Section 106 consultation process. In accordance with 36 CFR Part 800.8 (Coordination with the NEPA), the NRC is preparing an Environmental Assessment (EA) which will include consideration of any historical preservation issues.

If you require additional information, please contact Tom McLaughlin, NRC Project Manager for the Highland Reclamation Project, at (301) 415-5869 or via e-mail to [Thomas.McLaughlin@nrc.gov](mailto:Thomas.McLaughlin@nrc.gov).

In accordance with 10 CFR 2.390 of the NRC's Rules of Practice, a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of ADAMS.

Sincerely,

**/RA/**

Paul Michalak, Chief  
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: Site Maps

cc: K. Frederick, WDEQ  
D. Harris, WDEQ  
S. Ingle, WDEQ  
M. Moxley, WDEQ

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Paul Michalak, Chief  
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Distribution:  
Region IV

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