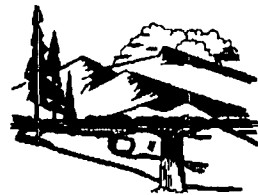




# Department of Environmental Quality

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



Matthew H. Mead, Governor

John Corra, Director

March 20, 2012

Mr. Ken Garoutte  
Cameco Resources, Inc.  
PO Box 1210  
Glenrock, WY 82637

**Subject: TFN 5 2/303, Radium Pond Cleanup Scope of Work  
Permit 603, Cameco Resources**

Dear Mr. Garoutte:

The Land Quality Division (LQD) received the referenced submittal on February 13, 2012 and a review has been completed with comments. Please address the comments at your earliest convenience.

If you have any questions contact me at 777-7048 or [pam.rothwell@wyo.gov](mailto:pam.rothwell@wyo.gov).

Sincerely,

Pam Rothwell  
District 1 Assistant Supervisor  
Land Quality Division

Encl

cc: Cameco Resources, Cheyenne, w/attach.  
Doug Mandeville, NRC w/attach.



TFN 5 2/303, SCOPE OF WORK, SATELLITE 1 - RADIUM POND CLEAN UP PROPOSAL  
PERMIT 603, CAMECO RESOURCES (CR)

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## HISTORY

The 2008-2009 Annual Report review for Permit 603 included a comment addressing the lack of concurrent reclamation at Satellite No. 1. Comment No. 6 was stated as follows:

***"The LQD requests a formal proposal for LQD review and concurrence to delay the reclamation of the Highland Central Processing Facility, Satellite 1, Irrigator 1, PSR-1 and the Radium Settling Basins. This proposal should include a detailed explanation justifying the delay to conduct concurrent reclamation as well as a proposed schedule showing the plans for reclamation of the facilities. It is requested the proposal be submitted by June 1, 2010. (PCR)***

CR responded to the request for the proposed plan on May 25, 2010 requesting an extension for the submittal in late September 2010. The request also committed to provide a schedule for the reclamation of the radium settling basins by July 30, 2010. The *Radium Ponds Clean Up Project Phase I Soil Sampling and Analysis Plan* was provided to LQD on July 29, 2010. LQD provided technical review comments of the plan on September 7, 2010 with responses to LQD received on September 14, 2010. LQD deemed all responses acceptable with concurrence to begin sampling according to Phase I of the plan on September 27, 2010.

LQD continued to inquire about the status of the project through site inspections and meetings with CR during 2011. It wasn't until the January 2012 inspection that CR provided additional information on the project status. A *Draft Scope of Work* was received on February 13, 2012. The Scope of Work was assigned a new TFN (5 2/303) to aid in tracking the reclamation issue going forward. The cover letter explained the delay with sample collection and analysis which is now concluded with the soil cleanup re-scheduled for 2012.

## COMMENTS

- 1 Page 2, second paragraph states, *Cameco Resources will evaluate the results to verify concentration limits of 10 CFR 40, Appendix A, Criterion 6(6) are met as referenced in NUREG-1569, Section 6.4.2.* LQD will need to be able to ensure that the NRC requirements for decommissioning are met (see Comment 5 below). Please provide the specific concentrations in the plan rather than the reference. **(PCR)**
- 2 It is noted that the Scope of Work does not include a radiological protection plan to ensure worker safety during cleanup as required in Section 6.2.2 of NUREG-1569. A discussion with Mr. Ken Garoutte on March 19, 2012 confirmed that CR has included worker safety plans in a separate draft of the scope. Those requirements were omitted from the LQD Draft Scope of Work as they are outside the authority of LQD regulations. No response required. **(SI/PCR)**

- 3 Going forward, the LQD intends to review surface reclamation for the radium pond clean up under the referenced TFN 5 2/303. Therefore, copies of the documents and letters noted in the History section above will be inserted into the new TFN. No response required. (PCR)
- 4 The 2010-2011 Surety Estimate includes a cost to reclaim the east and west radium ponds (MISC REC, Section IV). The dollars estimated are \$21,161.00. No response required. (PCR)
- 5 It was explained by Mr. Garoutte that the NRC is not currently reviewing the Scope of Work as they will evaluate the reclamation during site decommissioning at the end of mining. However, LQD requires concurrent site reclamation for mine sites. LQD will base the cleanup success on the same standards required by the NRC. In addition, LQD may discuss the soil reclamation success with the DEQ Solid and Hazardous Waste Division (SHWD). At a minimum, it is important that CR inform NRC of the cleanup plans to address LQD's concurrent reclamation requirements. As LQD holds the reclamation bond for both regulatory agencies, LQD will not release surety dollars without NRC concurrence of the site reclamation. If federal lands are involved, concurrence from BLM will also be required. (PCR)
- 6 CR should evaluate tracking and documentation of successful reclamation units (acres) for future bond release reference. The tracking of bond release acres is essential in allowing LQD to release surety. No response required. (PCR)
- 7 The proposal is titled *Draft Scope of Work*. Please remove *Draft* from the title. (PCR)
- 8 The responses to the 2008-2009 Annual Report comments were received on July 19, 2011. The response to Comment No. 6 (stated above) only addressed the **radium pond** reclamation. CR has also provided information to LQD independent of the AR, plans to renovate the **Highland Central Processing facility**. In addition, the 2010-2011 Annual Report explained that **Satellite 1** will be reclaimed upon NRC concurrence of successful restoration of MU-B. A verbal discussion occurred recently with CR and LQD regarding future use of **PSR-1** and **Irrigator 1**. Although the response to Comment No. 6 only addressed the radium ponds, LQD is satisfied that information has been provided through separate paper trails and discussions to address the comment. CR will need to continue to move forward with plans to either reclaim or use each of the facilities. It is not acceptable to leave facilities in standby or idle status. No response required. (PCR)