

October 16, 2012

U.S. Nuclear Regulatory Commission  
 Attn: Ms. Johari A. Moore, Project Manager– Mail Stop T-8F05  
 FSME/DWMEP/Environmental Review Branch B  
 11545 Rockville Pike, Two White Flint North  
 Rockville, MD 20852-2738

**RE: Ross ISR Project, Docket #040-09091, Submittal of Enlarged Version of Figure 72 and Errata to the Supplement to the Environmental Report, Addendum 3.8-A National Register of Historic Places Evaluations: Testing of Selected Sites at the Proposed Ross ISR Project, Crook County, Wyoming**

Dear Johari:

On behalf of Strata Energy, Inc. (Strata), WWC Engineering (WWC) hereby submits the following enlarged Figure 72 and errata to the Supplement to ER Addendum 3.8-A provided in August 2012. Both the enlarged Figure 72 and replacement pages should be withheld from public availability as they provide specific locations of potentially eligible prehistoric sites. Based on the email from you dated September 25, 2012, we are not providing a confidential and privileged affidavit with this submittal as the current affidavit addresses this document. Please note that both the replacement pages that make up the errata and enlarged Figure 72 are properly marked “Confidential and Privileged”.

The errata to the supplement is described in the table below and was due to mistaken coordinate translations. During development of the enlarged Figure 72 it became apparent that several downloads from field GPS units incorrectly juxtaposed test site names and the locations. The errata provided herein resolves this juxtaposition of site ID and locations for sites tested in May 2012.

**Summary Table of Change Index for 10/16/12 Errata to Supplement to ER Addendum 3.8-A**

<b>Page, Table or Figure to be Removed</b>	<b>Page, Table or Figure to be Added</b>	<b>Description of Change</b>
Table 2. Summary of 2012 Subsurface Test Units (pg 19-30)	Table 2. Summary of 2012 Subsurface Test Units (pg 19-30)	Revised Table to resolve test unit ID locations
Figure 12. Sketch map of site 48CK2070. (pg. 33)	Figure 12. Sketch map of site 48CK2070. (pg. 33)	Revised Figure to depict updated test unit ID and locations
Figure 20. Updated sketch map of site 48CK2072 (pg. 47)	Figure 20. Updated sketch map of site 48CK2072 (pg. 47)	Revised Figure to depict updated test unit ID and locations
Figure 30. Sketch map of site 48CK2076 (pg. 58)	Figure 30. Sketch map of site 48CK2076 (pg. 58)	Revised Figure to depict updated test unit ID and locations
Figure 37. Sketch map of site 48CK2077 (pg. 65)	Figure 37. Sketch map of site 48CK2077 (pg. 65)	Revised Figure to depict updated test unit ID and locations
Figure 48. Sketch map of site 48CK2083, as revised (pg. 74)	Figure 48. Sketch map of site 48CK2083, as revised (pg. 74)	Revised Figure to depict updated test unit ID and locations

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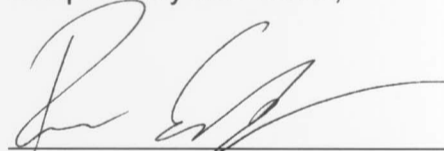
Strata appreciates the insight provided during the conference call on September 24, 2012 and believes that the enclosed enlarged figure and errata should provide the NRC and BLM with sufficient information to make a decision on site eligibility. We would also like to remind the NRC and BLM that the archeologists with GCM Services who implemented the test work at the Ross Project site, conducted the work after meeting with the BLM archeologist and developing a testing plan on April 5, 2012. With this in mind, the comments regarding test work adequacy and results appear to be misplaced. Further, we would advocate that the soils work conducted as part of the baseline survey for the project should be more than adequate for a Class III cultural inventory and that a geoarcheological approach as suggested is unnecessary given the small area and lack of relevance to eligibility. More in depth soils analysis and geomorphological studies would be conducted as a site mitigation plan but not within the context of a Class III inventory. Given the significant amount of work conducted for this Class III survey we believe that sufficient data have been collected for decisions regarding eligibility. We encourage the BLM and NRC to complete their evaluation and forward the decision and necessary documents along to the WSHPO for concurrence.

The enclosed package includes; three (3) hard copies of the errata pages and enlarged Figure 72, and a CD providing the Supplement to ER Addendum 3.8-A with the replacement pages and enlarged Figure 72. In addition, a copy of the cover letter, enlarged Figure 72 and errata pages along with a CD is also being provided to the document control desk at:

ATTN: U.S. Nuclear Regulatory Commission  
Document Control Desk  
Director, Office of Federal and State Materials and Environmental Management  
Programs  
11555 Rockville Pike,  
Rockville, MD 20852-2739

If you have any questions or comments, please do not hesitate to contact Mr. Ralph Knode with Strata or myself.

Respectfully submitted,



Benjamin J. Schiffer, P.G.  
WWC Project Manager

Enclosures: as noted

cc: Ralph Knode, Strata Energy  
Doris Minor, AEC  
Dr. Alice Tretabas, BLM-NFO  
Dave Ferguson, GCM Services  
Miles Bennett, WDEQ/LQD (w/o enclosures)

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