

StrataRossLAPEm Resource

From: Ben Schiffer [bschiffer@wwcengineering.com]
Sent: Friday, February 22, 2013 3:38 PM
To: Saxton, John
Cc: Mike Griffin
Subject: Ross ISR Project, Docket#090-09091, 2nd Round Comment to LC11.5 Paragraph #2
Attachments: Strata draft license_2nd Round_Comments_LC11.5.pdf

John--

Please see the attached pdf describing Strata's comment to draft license condition 11.5, paragraph #2. Let me know if you have any questions.

Ben

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Subject: Ross ISR Project, Docket#090-09091, 2nd Round Comment to LC11.5
Paragraph #2
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From: Ben Schiffer

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Recipients:
"Mike Griffin" <MGriffin@stratawyo.com>
Tracking Status: None
"Saxton, John" <John.Saxton@nrc.gov>
Tracking Status: None

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MESSAGE	364	2/22/2013 3:38:27 PM
2002logo.jpg	14769	
Strata draft license_2nd Round_Comments_LC11.5.pdf		108475

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
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Draft LC #	2 nd Round Draft License Condition	2 nd Round Strata Comments
11.5	<p>Upon confirmation of an excursion, the licensee shall notify NRC as presented in LC 11.1, implement corrective action, and increase the sampling frequency for the excursion indicator parameters at the well on excursion status to at least once every seven days. Corrective actions for confirmed excursions may be, but are not limited to, those described in Section 5.7.8.2 of the approved license application. An excursion is considered corrected when concentrations of all indicator parameters defining the excursion status are at or below the UCLs defined in LC 11.4 for three consecutive weekly samples.</p>	<p>NRC changed this LC to include: “<i>Upon confirmation of an excursion, the licensee shall notify NRC as presented in LC 11.1...</i>” It appears to Strata that the notification requirements are actually contained in the last paragraph of LC 11.5.</p> <p>Strata suggest deleting ‘presented in LC11.1’ and replacing it with ‘discussed below’.</p> <p>The revised License Condition would read as follows:</p> <p><i>Upon confirmation of an excursion, the licensee shall notify NRC as discussed below, implement corrective action, and increase the sampling frequency for the excursion indicator parameters at the well on excursion status to at least once every seven days. Corrective actions for confirmed excursions may be, but are not limited to, those described in Section 5.7.8.2 of the approved license application. An excursion is considered corrected when concentrations of all indicator parameters defining the excursion status are at or below the UCLs defined in LC 11.4 for three consecutive weekly samples.</i></p>

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