



October 1, 2013

Mr. Keith I. McConnell, Deputy Director
Decommissioning & Uranium Recovery Licensing Directorate
Division of Waste Management & Environmental Protection
Office of Federal & State Materials & Environmental Management Programs
Mail Stop T8-F5
U. S. Nuclear Regulatory Commission
11545 Rockville Pike
Rockville, Maryland 20852-2738

Ref: Docket No. 40-2259, Source Material License No. SUA-672
Surety estimate for the Lucky Mc mill tailings site

Dear Mr. McConnell:

The enclosed revision of the Lucky Mc mill tailings site surety estimate is submitted in fulfillment of the requirement of Condition 27 of the referenced license.

This surety estimate reflects the completion of the site closure, including the decommissioning of the ground water corrective action system and all other site wells not required by the license for monitoring purposes. The only remaining site activity is the routine quarterly well sampling. Itemized in this estimate are legal expenses, primarily related to the site transfer to DOE, and the remaining monitoring costs.

Pathfinder hereby requests an amendment to the referenced license to incorporate into the Lucky Mc license a revised surety amount for tailings and mill site reclamation as required by condition 27. A summary of the adjusted surety amount is shown below.

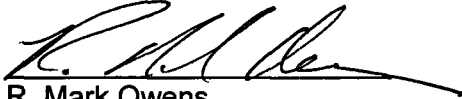
LUCKY Mc SITE		
<u>ACTIVITY</u>	<u>CURRENT ESTIMATED SURETY</u>	<u>PROPOSED SURETY</u>
1. Mill Decommissioning	\$0	\$0
2. Tailings Reclamation	\$55,800	\$55,800
3. Long Term Surveillance	\$846,027	\$862,614
SUBTOTAL	\$901,827	\$926,784
4. Contingency (15% of 1 & 2)	\$8,370	\$8,370
TOTAL	\$910,197	\$926,614
Increase/(Decrease)		\$16,417

PATHFINDER MINES CORPORATION

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The long term surveillance fee has been adjusted, consistent with the latest available CPI adjustment (July, 2013). Supporting information for the recalculated surety estimate is enclosed (two copies). Upon your written approval, we will proceed to obtain a rider for the existing Letter-of-Credit to reflect the revised surety amount.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Mark Owens', written over a horizontal line.

R. Mark Owens
General Manager

Enclosure

Cc: D. B. Spitzberg, USNRC Region IV
Cc: Document Control

LUCKY Mc TAILINGS SITE RECLAMATION COST ESTIMATE
September 26, 2013

Table 1 presents a cost estimate summary for the reclamation of the Lucky Mc mill site and tailings to 10 CFR 40 Appendix A standards. All site work has been completed.

The following text provides supporting information for the unit costs or total costs developed for the limited number of remaining site activities.

A. Re-vegetation:

All re-vegetation work has been completed.

B. Construction Management and Miscellaneous Expenses

Site construction has been completed; therefore, no costs are associated with construction management and incidental overhead.

Miscellaneous expenses are estimated as follows:

- 1) Engineering design/plan changes – The planned work has been completed as it relates to the tailings reclamation plan. Therefore, no cost is assigned to this item.
- 2) Mobilization – All site work has been completed.
- 3) Legal Expenses – An estimated **\$10,000.00** is applied to this activity. This is exclusive of the license termination activities, including site transfer to DOE, discussed below.
- 4) Power – All utilities for the site have been disconnected coincident with the demolition of the office and all other facilities.
- 5) Completion report preparation – The completion report has been submitted to the NRC (April, 2005).
- 6) License termination activities – The cost to terminate the NRC license and transfer the site to DOE is estimated as follows:

Legal expenses -	5,000
Labor – 200 hrs. at \$83/hr -	16,600
Miscellaneous -	<u>2,000</u>
Total	\$23,600

Note that the final survey, and survey caps, signs, and monument installations have been completed.

C. Groundwater Restoration:

Alternate concentration limits (ACLs) have been approved for the site. The corrective action program has been terminated for the site.

Well Plugging:

Exclusive of the five wells monitored as specified in the license, all wells associated with the site have been abandoned by plugging with bentonite chips, concrete capping three feet below the land surface, and soil backfilling to the surface. All related surface equipment such as well sheds, power lines, etc. have been removed.

D. Fencing:

The existing restricted area fence has been repaired as needed over its entire length, and it has been modified in the vicinity of the No. 8 production well (south end of site). No additional costs for fencing are anticipated.

E. Radiological Survey and Environmental Monitoring:

Post Reclamation Ra226 Survey:

The post reclamation gamma/Ra226 survey field work has been completed. A report on the survey and any subsequent cleanup effort was included in the TRP completion report (April, 2005).

Environmental Monitoring:

An environmental monitoring program will consist solely of the quarterly sampling of five monitor wells. Monitoring will continue until the anticipated site transfer to DOE; it is assumed that four more quarters of monitoring are required.

Labor costs, semi-annual report preparation, and other miscellaneous expenses are based on the use of a consultant at current rates that Pathfinder has paid.

Labor and Program Administration -

1 technician for 20 hrs/qtr for four quarters:
 $20 \text{ hrs/qtr} \times 4 \text{ qtrs} \times \$30.00/\text{hr} = \$2,400.$

1 vehicle (including mileage) for two days/qtr for four quarters:
 $2 \text{ days/qtr} \times 4 \text{ qtrs} \times \$125/\text{day} = \$1,000.$

Administration and general overhead, and general engineering/consultant oversight (including report preparation) -

$$\text{Administration/overhead} = \$500/\text{mo} \times 12 \text{ mo/yr} \\ \times 1.0 \text{ yr} = \$6,000.$$

$$\text{Engineering/consultants} = \$400/\text{mo} \times 12 \text{ mo/yr} \\ \times 1.0 \text{ yr} = \$4,800.$$

Analytical Work -

Based upon current costs for the outside analytical work done at Lucky Mc to maintain the environmental monitoring program as required by the license (post-ACLs approval), the following would apply:

	<u>Quarterly Cost</u>
Water sample analyses	\$ 2,000

Total Analytical Costs for 4 quarters:

$$\$2,000/\text{qtr} \times 4 \text{ qtrs} = \$8,000.$$

Total Costs for Environmental Monitoring:

$$\$2,400 + \$1,000 + \$6,000 + \$4,800 + \$8,000 = \mathbf{\$22,200}.$$

F. Inflation Adjustment of the Long Term Surveillance Fee

Consumer Price Index, all urban consumers:

July, 2013 = 233.596

December, 1978 = 67.7

$$233.596/67.7 \times \$250,000 = \mathbf{\$862,614}.$$

Pathfinder Mines Corporation, Lucky Mc Mine
Tailing and Mill Site Reclamation Internal Cost Estimate Summary

Activity	Quantity	Unit Cost (\$)	Cost
Regrading:	0 CY	0.73 /CY	\$0
Tailings/millsite cover & protection:			
Radon barrier placement	0 CY	1.30 /CY	\$0
Filter bed stockpiled on site	0 CY	2.00 /CY	\$0
Rock mulch stockpiled on site	0 CY	2.00 /CY	\$0
Small riprap stockpiled on site	0 CY	4.50 /CY	\$0
Large riprap placement	0 CY	4.50 /CY	\$0
Topsoil - Borrows	0 CY	0.70 /CY	\$0
Revegetation:			
Discing & seeding	0 AC	99.00 /AC	\$0
SUBTOTAL	---	---	\$0
Contractors' mobilization/demobilization			\$0
TOTAL RECLAMATION CONTRACTOR COST			\$0
Construction management			\$0
Other miscellaneous expenses			\$33,600 B
Completion Report Preparation			\$0
Groundwater restoration			\$0
Fencing			\$0
Radiological surveys			\$0
Environmental monitoring			\$22,200 E
	TOTAL		\$55,800
	Contingency (15%)		\$8,370
	Site Surveillance		\$862,614 F
	GRAND TOTAL		\$926,784

* See the corresponding text section for an explanation of the derivation of costs.
All tailings-related regrading and cover/erosion protection placement has been completed.