

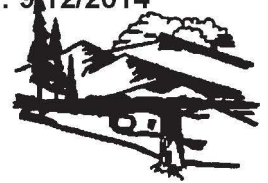


Matthew H. Mead, Governor

# Department of Environmental Quality

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

NRC051  
Submitted: 9/12/2014



Todd Parfitt, Director

January, 7<sup>th</sup>, 2013

Jon Winter  
Uranium One USA, Inc.  
907 North Poplar Street  
Casper, WY 82610

United States Nuclear Regulatory Commission Official Hearing Exhibit	
In the Matter of: STRATA ENERGY, INC. (Ross In Situ Recovery Uranium Project)	
	ASLBP #: 12-915-01-MLA-BD01
	Docket #: 04009091
	Exhibit #: NRC051-00-BD01
	Admitted: 10/1/2014
	Rejected:
Other:	Identified: 10/1/2014 Withdrawn: Stricken:

**SUBJECT: NRC "Technical Evaluation Report Christensen Ranch Mine Units 2 through 6 Restoration Report Uranium One USA, Inc., Willow Creek ISR Facility, October 23<sup>rd</sup>, 2012, Docket 040-08502, " WYDEQ-LQD Permit to Mine No. 478.**

Dear Mr. Winter,

LQD staff has reviewed the above outlined NRC technical evaluation report "TER" concerning the Christensen Ranch Mine Units 2-6 Restoration. The subject "Wellfield Restoration Report, Christensen Ranch Project" dated March 5<sup>th</sup>, 2008 has been extensively reviewed by NRC. LQD wishes to express its concurrence with the technical findings and provisions as outlined in the TER presented under cover of Mr. Ron Linton's letter of the same date. Specifically, LQD requests that each item as outlined within the NRC's summary (pgs. 47 & 48) be addressed.

The technical considerations presented by NRC are quite sufficient. Concerns of former LQD staff involved in an initial review of the subject restoration report have been affirmed by the NRC. Additionally, fate and transport modeling was missing from the original report and NRC went above and beyond to produced this work in evaluation of the document. It would be wise for Uranium One to accept the entire technical evaluation conducted by the NRC as a step forward.

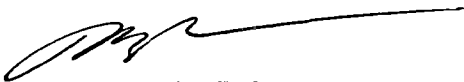
Of great importance is the evolution of mining at the project since 2008. The fact that Mine Unit 5 has since been partially returned to active mining status and that mining activities in Mine Unit 7 are clearly affecting the groundwater gradient across "restored" Mine Unit 6 are notable issues. It is not unreasonable to assume similar issues could occur anywhere mining is actively occurring adjacent to previously "restored" areas. The 2008 Restoration Report is in need of update and revision from this perspective alone. Thus, the NRC's outlined provisions must be considered in light of the current and future mining plans of Uranium One in the area, including potential for permit amendment areas. As such, please address NRC's outlined issues accordingly and logically. Explanation as to the course of actions you wish to take in resolution



of the NRC findings should include these realities. Additionally, you may wish to consider removal of some areas from consideration of "restoration" because of adjacent mining and/or future mining plans.

Most importantly, LQD expects progress on the restoration of previously mined units in a timely fashion. A logical progression of mining and restoration should be occurring and is indeed anticipated by rule and as part of the 478 permit to mine schedules. The approved schedules for Units 7, 8, and 10 (pending) alone have active production mining occurring 2013-2017. There should be ample production in place to facilitate a timely restoration effort in areas not significantly affected by production. Restoration work is an integral part of the modern mining process and employs qualified staff and specialized equipment which creates and/or maintains jobs to the benefit of both industry and the environment. LQD intends to work with both Uranium One and WQD in addressing "limiting factors" such as waste discharge capacity and infrastructure. It is believed that through technology, collaboration, creativity, and innovation the desired restoration goals can be achieved with mutual benefit. As such, LQD would like to encourage Uranium One to aggressively pursue the restoration and reclamation of previously mined out units wherever possible while it also responsibly mines. There exists an excellent opportunity for the demonstration of success in these areas at Christensen Ranch (Willow Creek) from both the industry and regulatory perspectives. LQD is confident that, with Uranium One's timely and satisfactory follow up to the NRC's technical review, significant progress can indeed be made. Should you have any questions please contact me at any time.

Regards,



Mike Ploughe P.G.  
Project Geologist

/mp

cc: Cheyenne File  
Nancy Nuttbrock, LQD  
Ron Linton, NRC