

**Request for Additional Information (RAI) Input for  
Homestake Mining Company of California's 2014 Financial Assurance Update  
for its Grants Mill Uranium Recovery Facility**

**RAI (1)**

**Description of Deficiency**

As currently presented, the parent company guarantee (PCG) submission does not include a revised PCG agreement with updated language based on the audited, year-end financial statements for the latest fiscal year at the time of submission to the NRC as required by 10 CFR Part 30, Appendix A. Additionally, the audited financial statements provided by the parent company by letter dated March 31, 2014, are for the fiscal year ending December 31, 2012 and not December 31, 2013.

**Basis for Request**

The PCG agreement on file was signed on May 16, 2003. The PCG cites its audited financial statements as of December 31, 2002, as the basis for meeting the financial test criteria required by 10 CFR Part 30, Appendix A.II. However, the financial test must be met using the audited, year-end financial statements for the latest fiscal year at the time of submission. Additionally, the audited financial statements provided by the parent company are for year-end December 31, 2012 instead of year-end December 31, 2013, which would be the latest year-end financial statements at the time of the submission by letter dated March 31, 2014.

**Formulation of RAI**

Staff requests that the licensee provide a signed executed copy of its revised PCG agreement with updated required language based on the guarantor's audited, year-end financial statements for the latest fiscal year at the time of submission and use the latest audited, year-end financial statements as the basis for the financial test per 10 CFR Part 30, Appendix A.II.

**RAI (2)**

**Description of Deficiency**

As currently presented, the PCG submission does not include a standby trust agreement.

**Basis for Request**

Per Part 30, Appendix A.III.D, "[a] standby trust...must be established for decommissioning costs before the [PCG] agreement is submitted. The trustee and trust must be acceptable to the Commission. An acceptable trustee includes an appropriate State or Federal Government agency or an entity which has the authority to act as a trustee, whose trust operations are regulated and examined by a Federal or State agency." Barrick Gold's PCG submission does not include a standby trust agreement.

Enclosure

**Formulation of RAI**

Staff requests that the licensee provide an acceptable standby trust to NRC for its PCG agreement.

**RAI (3)**

**Description of Deficiency**

As currently presented, the PCG submission does not include off-balance sheet transactions in its computation demonstrating it meets the appropriate financial test in order to qualify to provide a PCG per 10 CFR Part 30, Appendix A.II.B.

**Basis for Request**

Per Appendix A.II.B of 10 CFR Part 30, “[t]he parent company’s independent certified public accountant must compare the data used by the parent company in the financial test, which is derived from the independently audited, year-end financial statements for the latest fiscal year, with the amounts in such financial statement. The accountant must evaluate the parent company’s off-balance sheet transactions and provide an opinion on whether those transactions could materially adversely affect the parent company’s ability to pay for decommissioning costs.”

**Formulation of RAI**

Staff requests that that licensee provide an accountant’s special report that demonstrates that Barrick Gold Corporation meets all the components of the PCG financial test after deducting out the aggregate amount of all off-balance sheet transactions from each numeric component of the financial test.