

**From:** [Burrows, Ronald](#)  
**To:** [Larry Teahon](#)  
**Cc:** [Robert Tiensvold](#); [Doug Pavlick](#); [Sabrina Fox](#); [Striz, Elise](#); [Lancaster, Thomas](#)  
**Subject:** RE: Excursion Reporting  
**Date:** Wednesday, September 16, 2015 9:59:20 AM

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Larry,

NRC staff has reviewed your request for interpretation of the license conditions (LCs) related to the reporting of natural uranium data specific to Mine Unit 6 and Mine Unit 8.

LC 11.12 states:

If an overlying aquifer monitoring well in Mine Unit 6 or Mine Unit 8 is placed on excursion status per LC 11.5, the licensee shall test it weekly for natural uranium in addition to the required indicators of alkalinity, conductivity, and chloride. The natural uranium data from wells on excursion status in the overlying aquifer in Mine Units 6 or 8 shall be maintained in the on-site records. If a well in these specific mine units remains on excursion for more than 60 days, the licensee shall provide the natural uranium data with the UCL indicator data in the required sixty day excursion report in accordance with LC 11.5. (End of LC text)

The intent of LC 11.12 is for the NRC staff to receive all available results of the weekly tests for natural uranium, along with results of all other weekly tests for the excursion indicator parameters, as part of the report to be submitted "within 60 days of the excursion confirmation" specified in LC 11.5. If some of the natural uranium data is not available at the time that report is prepared, then CBR will provide the remaining test results for natural uranium from the weekly testing through the first 60 days of the excursion as soon as that data becomes available. If a well in Mine Unit 6 or Mine Unit 8 remains on excursion for more than 60 days, then natural uranium data for the time period beyond 60 days will be included in the quarterly report specified in LC 11.1(A).

We will process this clarification when the NRC staff completes the license amendment for the next surety update.

Regarding the natural uranium data for monitor wells SM6-28 and SM8-28, NRC staff would appreciate you forwarding this information via e-mail to me at your earliest convenience.

I apologize for the confusion and inconvenience.

Regards,

Ron

*Ronald A. Burrows*

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**From:** Larry Teahon [mailto:Larry\_Teahon@cameco.com]  
**Sent:** Wednesday, September 02, 2015 1:30 PM  
**To:** Burrows, Ronald <Ronald.Burrows@nrc.gov>  
**Cc:** Robert Tiensvold <Robert\_Tiensvold@cameco.com>; Doug Pavlick <Doug\_Pavlick@cameco.com>; Sabrina Fox <Sabrina\_Fox@cameco.com>  
**Subject:** [External\_Sender] Excursion Reporting

Ron:

I need some guidance from you on the excursion reporting requirements as described in CBO's license that was renewed November 2014. The following is an outline of how I have interpreted the reporting requirements.

LC 11.1(A) – Quarterly Report

- Due 60 days past the end of the period  
Includes:
  - Corrective Actions
  - Lab Results of the excursion wells
  - Summary of weekly excursion parameters

LC 11.5 – Excursion Monitoring

- Within 7 days – send report  
Includes:
  - Event
  - Proposed corrective actions
  
- Within 60 days – send report  
Includes:
  - Event
  - Corrective actions taken
  - Corrective action results
  - Area where injection is terminated or if the surety has been increased
  
- Excursions over 60 days
  - Report as required in LC 11.1(A)

LC 11.12 – Excursions in Mine Units 6 and 8

- Test weekly for uranium
- Keep results in the on-site records
- If on excursion on more than 60 days
  - Send the uranium data with the UCL indicator data in the required 60 day excursion

**report** in accordance with LC 11.5

My interpretation of the “required 60 day excursion report” is that it is not a separate report but is actually information that is included in the quarterly report. It is confusing as one drills down through the reporting requirements if the intent is to actually have the licensee write a separate 60 day report. LC 11.5 indicates that excursions over 60 days have a reporting requirement as required in LC 11.1(A), which is the quarterly report. If this is not the case, it doesn’t give a timeline when this past 60 day report would be due. I would request that for clarification an administrative amendment be made to LC 11.12 to have the last sentence read as follows: *“If a well in these specific mine units remains on excursion for more 60 days, the licensee shall provide the natural uranium data with the UCL indicator data in accordance with LC 11.5”*.

Thank you,

**Larry Teahon**

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