



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

November 16, 2015

Mr. Thomas E. Gieck, Remediation Leader
Umetco Minerals Corporation
2754 Compass Drive, Suite 280
Grand Junction, CO 81506-8728

SUBJECT: U.S. NUCLEAR REGULATORY STAFF REVIEW OF JULY 2014 THROUGH
JUNE 2015 ANNUAL REPORT FOR THE UMETCO MINERALS
CORPORATION'S GAS HILLS EAST, WYOMING SITE (DOCKET NO. 040-0299)

Dear Mr. Gieck:

I am writing in response to the Umetco Minerals Corporation report entitled "Annual Report for Gas Hills, Wyoming July 2014 through June 2015" dated September 2015 (Agencywide Documents Access and Management System (ADAMS) Accession Number ML15280A027).

The Nuclear Regulatory Commission (NRC) staff has reviewed the report and has the following comments:

1. On page 2 it states that the NRC accepted the new Radiation Safety Officer (RSO) for the Gas Hills site on November 6, 2014, and references Appendix A of the report for the acceptance letter. Appendix A is entitled "Approval of New Site Radiation Safety Officer Letter dated November 6, 2014." However, as stated in the NRC's November 6, 2014 letter (ML14301A230):

The NRC staff does not typically approve a specific individual for the RSO position. Rather, the NRC approves the qualifications appropriate for the RSO position (in this case by incorporating the minimum requirements in your radioactive materials license) and it is incumbent upon the licensee to maintain documentation demonstrating that the RSO meets these qualifications. The information demonstrating that the RSO meets the minimum qualifications would be reviewed during any subsequent inspections of the Umetco site. Therefore, we are neither approving, nor disapproving, Ms. Sandberg as the RSO for the Gas Hills site.

Therefore, you should revise the report to reflect that the NRC stated that the minimum qualifications for an RSO are established in the radioactive materials license, that the licensee is required to maintain records showing that the RSO meets the qualifications and that the RSO's qualifications will be reviewed during inspections.

2. On page 6 it states that the Alternate Concentration Limit (ACL) for radium 226+228 was exceeded at Point of Compliance (POC) well GW7 and that, per Appendix M of Umetco's ACL application "Groundwater Monitoring Plan," the well was resampled on September 1, 2015. Please provide the results of the resampling of POC well GW7 to the NRC staff as soon as the results are available.

3. On page 8 it states that the sampling of model validation wells MW28, MW71B, MW72 and MW82 was conducted in September 2015 due to sampling equipment problems. The report further states that the results of the sampling of these wells will be included in the next Annual Report. Please provide the results of the sampling of the model validation wells as soon as they are available rather than waiting to include it in the next Annual report.
4. Column 3 of Tables 5.7 and 5.8 list the Point of Exposure (POE) values determined by the modeling of a single flow path rather than the POE values determined with background data, which accounts for the spatial variability in the entire flow regime and are considered appropriate for comparison to observed concentrations at the site boundary. Column 3 should use the POE values provided in the ACL application that was approved by the NRC on March 29, 2002. Additionally, the numbering for the headings representing footnotes are incorrect on page 12 of Table 5.7 and do not match those on page 13 of Table 5.7.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's ADAMS. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions concerning the NRC comments please feel free to contact me at (301) 415-6749 or at Dominick.Orlando@nrc.gov.

Sincerely,

/RA/

Dominick Orlando, Senior Project Manager
Materials Decommissioning Branch
Division of Decommissioning, Uranium Recovery,
and Waste Programs
Office of Nuclear Material Safety
and Safeguards

Docket No.: 040-0299
License No.: SUA-648

3. On page 8 it states that the sampling of model validation wells MW28, MW71B, MW72 and MW82 was conducted in September 2015 due to sampling equipment problems. The report further states that the results of the sampling of these wells will be included in the next Annual Report. Please provide the results of the sampling of the model validation wells as soon as they are available rather than waiting to include it in the next Annual report.

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