

From: [Burrows, Ronald](#)
To: [ronda.rabe.hasenauer](#)
Subject: RE: water restoration
Date: Thursday, March 10, 2016 10:26:00 AM

Dear Ms. Hasenauer,

Regarding your question on restoration costs, while the NRC does not track actual decommissioning expenditures by licensees, the NRC staff does compare the licensees' projected decommissioning costs (e.g., labor, equipment, etc.) with current published estimates for these costs. Each cost estimate also includes a contingency factor based on the total estimate for final site closure.

As required by 10 CFR Part 40, Appendix A, Criterion 9(e)-(f), the licensee must also adjust the amount of surety on an annual basis to include, for example, inflation, actual remediation costs that exceed previous cost estimates, and any other conditions affecting costs. These ongoing annual adjustments to the surety amount provide the NRC staff with reasonable assurance that sufficient funds will be available to cover the expected cost of a third party contractor to complete ground water restoration and site cleanup in the event that the licensee fails to do so.

Regarding your other question related to these costs, any alleged tax problems that Cameco has with any government entity are not relevant to the NRC staff's review and approval of either the appropriate surety amount or the surety instrument necessary for decommissioning the site.

Regards,

Ronald A. Burrows

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From: ronda.rabe.hasenauer [mailto:2horses395@gmail.com]
Sent: Friday, March 04, 2016 1:17 PM
To: Burrows, Ronald <Ronald.Burrows@nrc.gov>
Subject: [External_Sender] water restoration

My information for the 11 excursions, well failure tests and well mechanical test that was 2 years overdue are all from the NDEQ public information site. These are all from 2015. I also spoke to the technician who did the overdue well integrity test. I am familiar with the

ADAMS website. I learned from this site of the many extensions CBR requested and received for restoration. I spoke to David Miesbach on several occasions and have emailed him also with questions. I have also contacted several hydrologists at Universities and water technicians in South Dakota. The people on the Pine Ridge Reservation and their water quality matter to me just as much as my friends and neighbors here in Nebraska. As a **federal** agency overseeing a potentially hazardous ISL mine, are you not concerned about any underground water flow outside of the mining boundary? What about White River and English Creek? Fact: The mining industry has never fully cleaned up an aquifer polluted by ISL mining. Excursions can and do mobilize elements such as arsenic and lead that can move to other aquifers. The EPA gave an "out" for the ISL mines because it was found impossible for the restoration efforts to completely restore aquifers to premining baseline water quality so instead they are given a loophole and can restore the aquifer to "class-of-use". But the pollution remains. Today we know that these "restorations" should be monitored for 30 years. Nebraska's totally inadequate regulations are monitoring for 1 year. With over 5000 wells at Crow Butte I don't expect this abomination will be cleaned up in my grandchildren's lifetime or ever.

If you don't know the costs for restoration of MU1, how do you know that \$19,596,570 will be sufficient to cover units MU2-MU11? Do Cameco's tax problems with Canada and the IRS play into your review of their financial stability for the very long term restoration of the entire mining site?

Nebraska did not require testing for arsenic when the baseline water testing was done. According to David Meisbach, NDEQ does not have records of premining arsenic levels. In the May 2015 testimony of Larry Teahon of CBR he stated "we have tested wells all the way to the White River". If NRC regulations do not require this why was it asked and answered during their licence review?

Thank you for your information.