

Miller, Debra

From: Jim Viellenave <jviellenave@auc-llc.com>
Sent: Tuesday, September 13, 2016 6:31 PM
To: Glenn, Chad
Cc: Leland Huffman; Dan Dowers
Subject: [External_Sender] AUC LLC Review of Draft Materials License (Following OGC legal review) September 6, 2016 Version

Chad.

AUC has reviewed the Draft Materials License sent by NRC September 6, 2016. The following items are proposed minor revisions of the license. You and your colleagues and OGC are to be complimented by the quality document you sent us. If you have any questions, please let me know. I will be generally available Wednesday and Thursday of this week, as well as Tuesday of next week. We could do a PM to PM meeting by telephone if necessary.

1. License Condition 9.2, page 2 of 18, paragraph 2, line 2. The word “term” is misspelled at the end of the line.
2. License Condition 10.10, page 9 of 18, line 2, please add language as follows: ...biological or chemical materials, *other than sodium sulfide*, for reductant..... Reference Mr. Chad Glenn’s memorandum dated November 23, 2015 (ML15323A358); subject: REPORT OF OCTOBER 8, 2015 MEETING WITH AUC LLC. NRC staff agreed to the following language for License Condition 10.10: ““The licensee shall submit to NRC staff, for review and approval, plans for equipment and procedures prior to the use, storage, handling and transport of biological or chemical materials other than sodium sulfide for reductant injections during restoration.”
3. License Condition 10.12, page 10 of 18, paragraph 1, line 7. Please replace the word “baseline” with *“background”*. In accordance with NRC practice, and as affirmed in the Strata hearings and before the Commission, baseline refers to the water quality characteristics in the regional testing completed prior to licensing. The wellfield packages contain water quality characterization that is used to determine Commission-approved “background” for purposes of UCLs, excursions, and for Restoration Target Values. See the correct usage in LC 11.3, Establishment of Background Water Quality.
4. License Condition 11.3, page 13 of 18, paragraph 1, line two. Please replace “ore zone” with *“Production Zone”*. Reference Mr. Chad Glenn’s memorandum dated November 23, 2015 (ML15323A358); subject: REPORT OF OCTOBER 8, 2015 MEETING WITH AUC LLC. NRC staff agreed to the text change.
5. License Condition 11.3, page 14 of 18, paragraph E), line 8. Please revise the sentence as follows: “...background levels shall be established on a parameter-by-parameter basis using either the Production Unit, sub-set of the Production unit or well-specific *area*.” This revision omits the words “mean value”. These words should be omitted because this is a discussion of the geographic areas tested not the statistical treatment, and the next sentence correctly defines how the Licensee shall conduct its statistical evaluation of the data (consistent with many places in the TR).
6. License Condition 11.5, page 15 of 18, paragraph 3. Please revise the “SA Aquifer” to *“SM Unit”*. The Term SA Aquifer has never been used in the application or RAIs. However, the SM Unit is used everywhere. The SM Unit’s definition as an aquifer where aquifer conditions occur still applies to the SM Unit, as seen in TR Section 2.7.2.3 Hydrostratigraphic Units.
7. License Condition 12.7, page 17 of 18, line 7. Please insert *“and”* between “equipment” “materials”.

We continue to work on the TR and ER updates, and we’ll send them soon. I’ll let you know.

Best regards,

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