

**From:** [Jim Viellenave](#)  
**To:** [Lowman, Donald](#)  
**Cc:** [Glenn, Chad](#); [Saxton, John](#); [Leland Huffman](#); [Dan Dowers](#)  
**Subject:** [External\_Sender] RE: Conference Call Needed  
**Date:** Thursday, September 29, 2016 10:33:50 AM

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Don.

Based on your email and subsequent conversation with John Saxton, AUC proposes the following rationale for excluding Silver from the list of parameters to be monitored at Reno Creek:

The list of analytes provided in TR Table 2.7B-31: PZM Zone Monitoring Results and Table 2.7B-31a Non-Baseline Monitoring Well Results is consistent with the list of analytes found in Table 2.7.3-1 of NUREG 1569 with the exception of Silver. AUC LLC believes that Silver should be excluded from the list of required analytes due to the extremely low concentrations of similar heavy metal elements such as copper. Copper was analyzed in each of the regional baseline and non-baseline wells at least 50 times with no detects. It is very unlikely that Silver exists in the Tertiary fluvial systems that have not been impacted by hydrothermal fluids. Silver has been excluded by WDEQ in its Guideline 8 analytes for ISR facilities, and most other ISR facilities are not required to analyze it as a consequence of this rationale.

Thanks.

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**From:** Lowman, Donald [mailto:Donald.Lowman@nrc.gov]  
**Sent:** Thursday, September 29, 2016 5:26 AM  
**To:** Jim Viellenave  
**Cc:** Glenn, Chad; Saxton, John  
**Subject:** Conference Call Needed

Hi Jim,

A small issue has come up during management review of the SER that we need to discuss with you. Management commented that we haven't documented a rationale for not including silver in the list of parameters to be monitored. We have a few options to resolve this and would like to discuss them with you. I'm hoping to resolve this issue this morning so please let me know when we can discuss via telephone.

Thanks,

**Don Lowman**

Project Manager

U.S. Nuclear Regulatory Commission

NMSS/DSFM/URLB

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