

From: Saxton, John
To: [Mike Griffin](#)
Subject: Proposed license condition for 11.3 A & B
Date: Thursday, March 09, 2017 12:18:00 PM

Mike,

Below please find staff's proposed license condition for 11.3 A & B

- A) Ore Zone. To establish a Commission-approved background concentration pursuant to Criterion 5B(5)(a) of 10 CFR Part 40 Appendix A, samples shall be collected from production and injection wells at a minimum density of one production or injection well per four acres of wellfield production area. If a portion of a wellfield production area is isolated by distance to other production areas within a wellfield or isolated hydraulically, as determined by the pumping tests, a minimum of one well in each of the isolated areas will be required for the baseline data if the isolated area is less than four acres in area. Wells selected for the baseline data will be the same ones used to measure restoration success and stabilization.
- B) Perimeter Monitoring Wells. Samples shall be collected from all perimeter monitoring wells that will be used for the excursion monitoring program. The perimeter wells will be installed for a wellfield in accordance with information presented in Section 3.1.6 of the approved license application, as amended by the submittal dated December 21, 2015 (ML16004A032), with the following stipulations: the distance between the nearest production unit and perimeter well will be between 300 and 400 feet and the spacing between perimeter wells will be between 300 and 500 feet provided that the maximum angle from the closest unit to the two nearest wells is less than 75 degrees. In no case will the perimeter monitoring wells be installed outside of the exempted aquifer as defined by the Class III UIC permit issued by the Wyoming Department of Environmental Quality.

If Strata agrees to staff's proposed license condition, please send me a response by email. After that, we will send the EA to Wyoming for comments.

As far as License Condition 11.3C, at the present time we cannot accept it as proposed. You will need to clarify how the 50 foot thickness of the aquitard is met if the thickness of that portion overlying the DM Unit is less than 50 feet, clarify the well yields based on an established regulatory threshold, e.g., Wyoming's Guideline 4, and address the environmental impacts of sampling/reduced sampling similar to guidance in NUREG-1569 (see Acceptance Criterion 5.7.8.3(3)). You could submit a response directly in response to this email or, if you prefer, I will prepare formal RAIs and/or schedule a public meeting to discuss this topic.

John Saxton