

**From:** Saxton, John  
**To:** [Mike Griffin](#)  
**Subject:** Supple Information Request for 11.3B license amendment  
**Date:** Monday, April 03, 2017 1:58:00 PM

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Mike,

Thank you for your recent submittal responding to the proposed draft license conditions for the license amendment request to modify license condition 11.3 A & B (see ML17089A275 and ML17079A289). In order to complete its review of the supplemental information, the NRC needs the following additional supporting information:

- Please provide Strata's rationale and justification for the proposed revised narrative in the license application that the standard 400-foot distance is 400 feet +/- 5 percent.
- Please provide an example Upper Control Limit (UCL) calculation using your proposed procedures.

### **Bases**

In a PM-to-PM call to clarify the proposed license conditions, the NRC staff indicated that the limitation of a distance for the perimeter well from the production area to 400 feet from the 500 feet requested was due to the delay in timing for a detection of an excursion because of the poor baseline water quality at the Ross facility and referred to staff's calculations (see ML17069A034). Strata expressed an approach to address staff's issue with timing by reducing the UCL levels.

In that PM-PM call, Strata expressed concern about wells that may have been installed to meet the 400-foot criterion but, due to logistical issues, may slightly exceed 400 feet. The NRC staff's review only compared the 400-foot scenario with the 500-foot scenario. In order for staff to evaluate whether a 5-percent tolerance is justifiable, Strata needs to provide NRC with additional supporting information.

Finally, the proposed procedures in Strata's response documents the principles for Strata's approach but does not provide any evaluation on implementation of that approach. The NRC staff needs to evaluate that the approach results in a timely detection of an excursion. At a minimum, Strata needs to provide an example calculation.