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June 13, 2017

Mr. Dominick Orlando
Senior Project Manager
Materials Decomm Branch
Division of Decommissioning, Uranium Recovery and Waste Programs
Office of Nuclear Material Safety and Safeguards
Mailstop T8-F5
Washington, DC 20555-0001

**RE: License SUA-442, Docket No. 040-6622
Response to NRC's May 10, 2017 Comments on the Semi-Annual Groundwater
Monitoring Report for the Shirley Basin North Uranium Mill Site**

Dear Mr. Orlando,

In response to the above-referenced comment letter, PMC has re-evaluated the groundwater analytical results considering NRC's specific concerns. Our evaluation indicates that although the two Point of Compliance wells have not exceeded any of the applicable ACL criteria, other monitor wells have on occasion exceeded a particular ACL parameter.

The computer modeling performed in 2000, and included as part of the ACL Application, predicted that: 1) a groundwater plume would emanate from the tailings impoundment once the tailings dewatering activities ceased, 2) the concentration of certain analytes would temporarily exceed baseline concentrations, but 3) with time, those concentrations would abate. In reviewing the time series vs. concentrations graphs, PMC believes that we have passed most concentration peaks, and are now on the declining part of the curves. Additional test results would help to confirm our thinking. Accordingly, PMC request time to gather two more quarterly results before revisiting these issues in our September semi-annual report.

If you have any questions regarding our proposed approach, please feel free to contact me at our Casper office.

Regards,

Mr. John W. Cash
President

Cc: Mrs. Theresa Horne, Ur-Energy Littleton Office