

July 25, 2017

United States Nuclear Regulatory Commission  
Attn: Dominick Orlando, Project Manager  
Decommissioning and Uranium Recovery Licensing Directorate  
Division of Waste Management and Environmental Protection  
Office of Federal and State Materials and Environmental  
Management Programs  
11545 Rockville Pike  
Rockville, MD 20852

**RE: Source Material License SUA-56; Western Nuclear, Inc., Split Rock Uranium Mill Tailings Facility.**

Dear Mr. Orlando:

In your letter of July 11, 2017, you provided comments on the most recent groundwater monitoring reports. In your letter, you provided the following comment:

Concentrations of Beryllium, Fluoride and Nickel in well WN-4R exceed the ACL limit but as this well is up-gradient from the Point of Compliance well WN-5, this does not constitute a violation of the NRC regulations at 10 CFR 40 Appendix A Criterion 5. However, the NRC staff believes that WNI should determine if the concentrations of these constituents are trending upward as it could indicate a potential issue with the cell integrity.

We agree that since well WN4-R is up-gradient of the POC well (well WN-5), it is not appropriate to apply groundwater protection standards required in well WN-5 to this well.

As suggested, the data base was reviewed and it was determined that fluoride and nickel exist at concentrations in excess of the groundwater protection standards assigned to well WN-5. The beryllium values do not exceed the well WN-5 groundwater protection standards (all beryllium values are less than detection). The cadmium values in well WN4-R are in excess of the well WN-5 groundwater protection standards and it is assumed that this was the other constituent of concern rather than beryllium.

The water quality values for cadmium, fluoride and nickel for the last 10 years were plotted to determine if there were any upward trends. These plots are included in the attached figure.

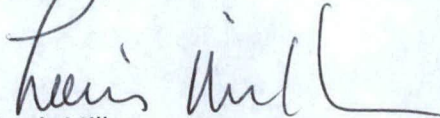
As can be seen, the plots clearly show that there are no upward trends as the concentrations for the last 10 years have been constant or have slightly downward trends.

We trust that this evaluation addresses your concern.

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Please let me know if you have any other questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Louis Miller". The signature is fluid and cursive, with a long horizontal stroke at the end.

Louis Miller  
Project Manager

Worthington Miller Environmental

cc . Lawrence Corte  
Harley Shaver  
Anthony Thompson  
Chris Pugsley

