

# Rio Algom Mining LLC

November 27, 2017

Mr. Varughese Kurian  
Nuclear Regulatory Commission  
Two White Flint, Mail Stop T8F5  
11545 Rockville Pike  
Rockville, MD 20852

Re: **Ambrosia Lake Facility**  
**License SUA-1473, Docket No. 40-8905**  
**Data Collection Work Plan in Support of Additional Alternate Concentration Limits**

Dear Mr. Kurian:

Rio Algom Mining LLC (RAML) respectfully submits the attached *Data Collection Work Plan in Support of Additional Alternate Concentration Limits (ACLs) (Work Plan)* for your review. This Work Plan outlines a process to develop ACLs for beryllium, cadmium, and molybdenum concentrations in the Dakota sandstone, and gross alpha activity in the Dakota and Tres Hermanos B (TRB) sandstones that exceed groundwater protection standards (GPSs) as defined in SUA-1473 (the License). ACLs developed for these constituents will eventually be incorporated into the License through an ACL application and, ultimately, a license amendment. Based on conversations with NRC, it is RAML's understanding that NRC will not be conducting a formal review of this Work Plan; however, NRC's willingness to provide review comments is greatly appreciated.

As you are aware, groundwater at the Ambrosia Lake site exceeds GPSs for beryllium, cadmium, gross alpha, and molybdenum. In accordance with a corrective action plan submitted on July 29, 2016, and as described in a letter dated April 13, 2017 Re: *Ambrosia Lake Facility License SUA-1473, Docket No. 40-8905 Status Update and Additional ACL Rationale*, RAML has developed this Work Plan. As RAML's April 13<sup>th</sup> letter detailed, a better understanding of the geochemical mechanisms controlling fate and transport of constituents of potential concern will be gained by obtaining the site-specific data. The Work Plan addresses these data gaps and outlines the process and rationale for site-specific data collection to provide a more robust conceptual site model (CSM) and flow and transport model for the Ambrosia Lake Site. Once complete, this information will be used to develop ACLs.

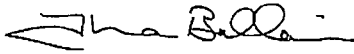
NM 5501  
NMSS

November 27, 2017  
Page 2

RAML looks forward to NRC's review comments on this Work Plan and to working with NRC to accomplish the Work Plan objectives. If you have any questions or need additional information, please call me at (209) 736-4803.

Sincerely,

**Rio Algom Mining LLC**



Theresa Ballaine  
Manager

Cc: Bernadette Tsosie, DOE (email only)  
Alison Kuhlman, DOE contractor (email only)  
Kurt Vollbrecht, NMED (email only)  
William Pearson, NMED (email only)

Attachment: As stated

---