

March 29, 2018

Mr. Ken Kalman
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852-2738

Mr. Paul Davis
Oklahoma Department of Environmental Quality
707 North Robinson
Oklahoma City, OK 73101

Mr. Robert Evans
U.S. Nuclear Regulatory Commission
1600 East Lamar Blvd; Suite 400
Arlington, TX 76011-4511

Re: Docket No. 70-925; License No. SNM-928
2018 Groundwater Evaluation Update

Dear Sirs:

Collection and analysis of site-wide groundwater samples in 2013 and 2015 indicated that uranium concentrations varied significantly at some locations. Environmental Properties Management LLC (EPM) initiated an evaluation of the variability in historical site groundwater data. This evaluation used groundwater data collected from 2002 through 2016 to determine if the variability in contaminant concentration could be due to seasonal variation or the result of changing groundwater elevations. Most groundwater sampling events conducted prior to 2016 occurred on an annual basis, so there was little “seasonal” data.

EPM began quarterly collection of groundwater samples to generate a more robust set of data to provide for the evaluation of the relationship of contaminant concentrations relative to seasonal variation or changing groundwater elevations.

EPM submits herein *2018 Groundwater Evaluation Update*, which provides an update to the report submitted in March 2017. This report recognizes that there are still few data points for some calendar quarters, but obtaining additional quarterly data has not enabled the identification of any trends or correlation between contaminant concentration and either season or groundwater elevation.

The proposed budget for 2018 does include funding for the continued quarterly collection and analysis of groundwater samples. If data obtained from the four quarterly sampling events in 2018 does not provide evidence of correlation, EPM proposes to discontinue the continued quarterly collection and analysis of groundwater for this purpose after this report is updated during the first quarter of 2019.

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If you have questions or comments on the enclosed report, please contact me at 405-642-5152 or at jlux@envpm.com.

Sincerely,



Jeff Lux, P.E.
Project Manager

Enclosure