



Homestake Mining Company of California

Thomas Wohlford
Closure Manager

11 April 2018

Director, Office of Enforcement (OE)
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852- 2738

40-8903

Deputy Director, Division of Decommissioning, Uranium Recovery and Waste Programs
Two White Flint North
11545 Rockville Pike
Rockville, MD 20852-2738

Mr. Jeffrey Whited
Project Manager, Materials Decommissioning Branch (Mail Stop: T-8F5)
Decommissioning, Uranium Recovery & Waste Programs
Office of Nuclear Materials Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

RE: Homestake Mining Company of California – Grants Reclamation Project - Request for Variance from Condition No. 4 Items B, C and D of the Confirmatory Order for Previously Submitted Zeolite and Groundwater Monitoring Plan License Amendments

Dear Mr. Whited:

As per our telephone discussion on April 4, 2018, Homestake Mining Company of California (HMC) is requesting a variance from Condition No. 4 Items B, C and D of the Confirmatory Order (CO) (EA-16-11) of the two license amendment requests submitted to the Nuclear Regulatory Commission (NRC) for zeolite pilot testing and revised groundwater monitoring plan for the Grants Reclamation Project. The two license amendments are as follows;

- ADAMS Accession No. ML17361A007 - Homestake Mining Co of California – Request for Amendment to License to Add Zeolite Water Treatment System Document Date: 12/11/2017
- ADAMS Accession No. ML18018A102 - Homestake Mining Co. – Groundwater Monitoring Plan Document Date: 11/20/2017

HMC determined that these license amendments should be submitted prior to completion of the Self-Assessment as required by the Confirmatory Order (CO) (EA-16-11), Condition 3. HMC determined that these license amendments were needed in the near term and not required to go through CO Condition 4. Specifically;

- For the zeolite amendment request, a sufficient period of time of pilot testing has been completed since both zeolite remediation systems have been put on-line (300 gpm started in January 2016 and 1200 gpm zeolite system started in August 2016) and that, while there are some operational issues regarding total flows through the systems that

NMSSD1
NMSS

need to be corrected, the science was proven sound and the zeolite systems are effective in reducing dissolved uranium concentrations in the off-site plumes.

- With respect to the groundwater monitoring plan, the original list of 33 monitoring locations created in 1999 does not accurately reflect the extent of the current groundwater monitoring network that exists today on the Grants Reclamation Project site. Therefore, the new proposed list was updated to 109 proposed wells which includes the original 33 plus others that were installed after 1999. The new proposed list of wells also expands the groundwater monitoring parameters for the sampling locations.

It is HMC's understanding that only the assessment and related proposed corrective actions identified in Condition 3 of the CO are required to be submitted for third-party review and evaluation prior to being submitted for NRC. This may include descriptions of the proposed corrective actions but not necessarily the complete amendment applications or revised procedures.

Thank you for your time and attention on this matter. If you have any questions, please contact me via e-mail at twohlford@homestakeminingco.com or via phone at 505.290.2187.

Respectfully,



Thomas P. Wohlford, CPG

Closure Manager
Homestake Mining Company of California
Office: 505.287.4456 x34 | Cell: 505.290.2187

Copy To:

NRC Document Control Desk (Hard Copy)
W. Pearson, NMED (electronic copy)
M. McCarthy, Barrick, Salt Lake City, Utah (electronic copy)
G. George, Davis Wright Tremaine, San Francisco, California (electronic copy)
C. Burton, Barrick, Henderson, Nevada (electronic copy)
H. Burns, Barrick, San Antonio, Texas (electronic copy)
G. Hoffman, Hydro-Engineering, Casper, Wyoming (electronic copy)
R. Whicker, Environmental Restoration Group, Albuquerque, New Mexico (electronic copy)