



Homestake Mining Company of California

Thomas Wohlford
Closure Manager

16 May 2018

Document Control Desk
U.S. Nuclear Regulatory Commission,
Washington, DC 20555-0001

Director, Office of Enforcement (OE)
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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, Grants Reclamation Project, License Source Materials License SUA-1471, Docket Number 40-8903: Retraction of April 26, 2018 Notification of Unplanned Release under 10 CFR 40.60(b)(2) requirements

Dear Director:

This letter retracts our previous notification dated April 26, 2018 regarding Homestake Mining Company's (HMC) identification of an unplanned release of byproduct material in effluent water to the environment under 10 CFR 40.60(b)(2) requirements.

On April 25, 2018, HMC identified that the Molybdenum concentration for compliance monitoring point SP-2 (compliance monitoring point) collected on March 29, 2018, was 0.236 mg/L, above license condition 35B site standard for Molybdenum (0.1 mg/L), but below the 1 mg/L standard in the New Mexico Environmental Department (NMED) DP-200 permit. All other analytes were below license condition standards. HMC made notification of these results in the April 26, 2018 notification letter.

HMC understood the language "...required by regulation or license condition to prevent releases exceeding regulatory limits..." to include any regulatory limit, such as license condition standards contained in SUA-1471 condition 35B, rather than just the radiation protection limits identified in 10 CFR Part 20. However, based on a phone conversation on May 4, 2018 with NRC headquarters (Jeffrey Whited-Project Manager) and NRC Region IV (Linda Gersey), reporting to this citation was not appropriate in that the "regulatory limits" of relevance are the 10 CFR 20 radiation protection limits, which HMC has confirmed were not exceeded. In that phone call, NRC requested a letter from HMC clarifying that the reporting with reference to 10 CFR 40.60 was incorrect. Therefore, HMC retracts the notification of this exceedance with respect to

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the cited regulation 10 CFR 40.60 in our original letter of April 26, 2018.

Per License Condition 41, HMC has documented the date, volume, total activity of each radionuclide and non-radiological hazardous constituent released and developed a map of where the waters were released.

HMC understands that it is obligated to provide a written assessment of this exceedance event within 30 days of confirmation of laboratory results per the Confirmatory Order Condition 10. Since confirmatory test data of the March 29, 2018 SP-2 sample were received on May 4, 2018, the assessment report is due to NRC by or before June 3, 2018.

If you have any questions or comments regarding this matter, please contact me via e-mail at twohlford@homestakeminingco.com or at the Grants office at 505.290.2187.

Respectfully,



Thomas Wohlford

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