



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

September 27, 2018

MEMORANDUM TO: Bill Von Till, Chief
Uranium Recovery Licensing Branch
Division of Decommissioning, Uranium Recovery,
and Waste Management
Office of Nuclear Material Safety and Safeguards

FROM: Douglas Mandeville, Sr. Project Manager */RA/*
Uranium Recovery Licensing Branch
Division of Decommissioning, Uranium Recovery,
and Waste Management
Office of Nuclear Material Safety and Safeguards

SUBJECT: SUMMARY OF SEPTEMBER 19, 2018, MEETING WITH POWER
RESOURCES, INC.

On September 19, 2018, U. S. Nuclear Regulatory Commission (NRC) staff met via webinar and teleconference with Power Resources, Inc., doing business as Cameco Resources. The purpose of the meeting was to discuss the NRC staff's comments on Cameco's alternate concentration limit application for Mine Unit 1 at Smith Ranch Highland. (Cameco is authorized to conduct uranium in situ recovery activities at Smith Ranch Highland under NRC License SUA-1548). The list of attendees; meeting agenda; and meeting summary are enclosed.

Docket Numbers: 40-8964
License Numbers: SUA-1548

Enclosures:

1. Meeting Summary
2. Meeting Attendees
3. Meeting Agenda
4. NRC PowerPoint Presentation

cc: Meeting Attendees (via email)

CONTACT: Douglas Mandeville, NMSS/DUWP
(301) 415-0724

SUBJECT: SUMMARY OF SEPTEMBER 19, 2018, MEETING WITH POWER RESOURCES, INC. **DATE September 27, 2018**

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OFFICE	DUWP
NAME	DMandeville
DATE	9/27/18

OFFICIAL RECORD COPY

MEETING SUMMARY

DATE: September 19, 2018

TIME: 2:00 p.m. to 2:45 p.m. Eastern time

PLACE: Webinar and Teleconference

PURPOSE: Discuss the NRC staff's comments on Cameco's alternate concentration limit for Mine Unit 1 at Smith Ranch Highland

ATTENDEES:

See List of Attendees (Enclosure 2).

BACKGROUND:

Power Resources, Inc., doing business as Cameco Resources (Cameco), currently operates the Smith Ranch Highland Uranium Project in Wyoming. Smith Ranch Highland is authorized to operate by the U.S. Nuclear Regulatory Commission (NRC) under Source Material License SUA-1548.

By letter dated February 6, 2018, Cameco submitted a license amendment requesting approval of alternate concentration limits (ACLs) for uranium, arsenic, and selenium in Mine Unit 1 at Smith Ranch Highland. The document is available in the NRC's Agencywide Documents Access and Management System (ADAMS) under Accession Number ML18186A538. With the anticipated turnover of uranium recovery oversight to the State of Wyoming in October 2018, sufficient time was not available for the NRC staff to complete its evaluation of Cameco's request. The NRC staff performed a limited review of the ACL application. This public meeting was held so that the NRC staff could provide comments on the ACL application.

DISCUSSION:

NRC staff read the opening statement for the meeting. Attendees of the meeting were asked to provide brief introductions. Enclosure 3 contains the meeting agenda.

After the opening statement, the NRC staff provided introductory remarks. The NRC staff stated that it was not able to perform a detailed technical review of the application and that no decision has been made. The NRC staff proceeded with a presentation containing its comments on the ACL application. The NRC staff's presentation is available in Enclosure 4. After completing its presentation, the NRC staff shared the following additional comments.

Groundwater modelling

The NRC staff commented that understanding the groundwater flow model will be important. The NRC staff pointed out that the ACL application anticipates that the groundwater levels within Mine Unit 1 will recover to their pre-recovery levels. The applicant reported the recovery

would correspond to a rise in the groundwater level of approximately 74 feet. The NRC staff stated they were not able to verify the basis for this finding.

Health Risk Assessment

The NRC staff commented that the section of the ACL application discussing the health risk assessment addressed the factors that are recommended in Section 4.3 of the guidance contained in NUREG 1620.

10 CFR Part 40, Appendix A, Criterion 5c

The NRC staff commented that section 4.2.3 (3)(b) of NUREG 1620 provides guidance on how to address groundwater protection standards if there is a difference between EPA's MCLs and the values present in Criterion 5c for a constituent.

Questions and comments from the public

The following questions or comments were raised after the NRC staff presentation was complete.

1. Mr. Clay commented that the details of the monitoring program were explained in Executive Summary of the document. The NRC staff understands the comment.
2. Mr. Clay also explained that the proposed ACL of 51 mg/l for uranium was based on the projected flow path from one specific well. Based on the model and long time frame evaluated, the concentration of uranium in that well could potentially rise to 51 mg/l. The NRC staff understands the comment. The NRC staff stated that it is difficult to understand the request for an ACL of 51 mg/l when the current concentration of uranium in the groundwater is low and not expected to change significantly during the monitoring period.
3. Mr. Clay described a hypothetical scenario where the concentration of a certain parameter would be expected to rise to a higher level within a shorter time frame (i.e., 10 years). Mr. Clay questioned whether it would be appropriate to use that specific number, or that number plus some type of safety factor. The NRC staff recognizes the challenge in selecting an appropriate ACL while minimizing uncertainty and anticipating what may occur in the future.
4. Ms. Schramke commented that the conceptual model was explained in the submittal and that it would be possible to incorporate the groundwater stability report into the discussion. The NRC staff appreciates the comment.
5. Mr. Reimann asked whether the State of Wyoming will get a list of licensing actions as part of the Agreement State turnover process. The NRC staff explained that it has been having regular phone calls with the State of Wyoming and that it has shared a list of pending licensing actions with the Wyoming staff.

ACTION ITEMS:

The NRC staff identified the following action items during the meeting:

1. The NRC staff will complete the meeting summary within 30 working days.

Meeting Summary

- 3 -

The meeting concluded at approximately 2:45 p.m. Eastern Time.

Enclosure 1

Meeting Attendees
Date: September 19, 2018
Webinar and Teleconference
2:00 p.m. to 2:45 p.m.

Topic: Discuss the NRC staff's comments on Cameco's alternate concentration limit application for Mine Unit 1 at Smith Ranch Highland

NAME	AFFILIATION
Doug Mandeville	NRC
Elise Striz	NRC
John Saxton	NRC
Bill VonTill	NRC
Larry Reimann	Cameco
Beth Frye	Cameco
Mike Beshore	Cameco
Jim Shriver	Cameco
Janet Schramke	Enchemica (consultant to Cameco)
Jim Clay	Member of public
Ben Schiffer	WWC Engineering (member of public)

PUBLIC MEETING AGENDA:

Discuss the NRC staff's comments on Cameco's alternate concentration limit application for Mine Unit 1 at Smith Ranch Highland

September 19, 2018 2:00 p.m. to 4:00 p.m.
Webinar and Teleconference

MEETING PROCESS:

<u>Time</u>	<u>Topic</u>	<u>Lead</u>
2:00 p.m.	Introductions	All
2:10 p.m.	Opening Remarks	Cameco
2:15 p.m..	NRC Comments on ACL application	NRC
3:15 p.m.	Questions from Cameco	Cameco
3:45 p.m.	Questions from members of public	NRC/public
3:55 p.m.	Review of Action Items	NRC
4:00 p.m.	Adjourn	NRC