



Homestake Mining Company of California

Thomas Wohlford  
Closure Manager

11 October 2018

40-8903

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

Deputy Director, Division of Decommissioning, Uranium Recovery and Waste Programs  
Two White Flint North  
11545 Rockville Pike  
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**RE: Homestake Mining Company of California – Grants Reclamation Project – March 28,  
2017 Confirmatory Order Modifying License No. SUA-1471, EA-16-114, Condition 6  
Groundwater Corrective Action Program (CAP) Request for Extension of Time for  
Submission**

Dear Mrs. Ann Boland:

To satisfy Condition 6 of the March 28, 2017 Confirmatory Order, Homestake Mining Company of California (HMC) is required to submit a revised Groundwater Corrective Action Program (CAP) to the Nuclear Regulatory Commission (NRC) by January 01, 2019. HMC respectfully requests that the date for submission of the CAP to NRC be moved to December 18, 2019.

This time extension is requested to accommodate the additional time required to complete the Self-Assessment under Confirmatory Order Condition 3. The Self-Assessment was completed and submitted to the NRC on September 3, 2018 (ML18248A260). At the time HMC requested the extension to complete the Self-Assessment, which the NRC approved on December 26, 2017 (ML17340B341), the NRC was aware that granting the additional time would necessitate the CAP extension requested here.

As per our verbal discussion on October 4, 2018, HMC understands that the revised CAP should be completed as per NUREG-1620 *Standard Review Plan for the Review of a Reclamation Plan for Mill Tailings Sites Under Title II of the Uranium Mill Tailings Radiation Control Act of 1978, Rev. 1*. In addition, we understand that the NRC expects a Remedial Alternatives Assessment to be completed as part of the CAP, incorporating the results of groundwater modeling to simulate current and proposed remediation efforts, their effectiveness and predicted time for site closure of the Grants Reclamation Project. Groundwater modeling to create a new, larger groundwater model simulating the Grants Reclamation Project site and the San Mateo Creek Basin was initiated earlier this year and modeling activities are on-going.

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For the NRC's consideration in reviewing this request, HMC has established the following interim Milestones to track its progress on the groundwater model and CAP completion.

1. Submittal of Hydrogeology Site Conceptual Model: Completed January 8, 2018 – Technical Memorandum, *San Mateo Creek Basin and HMC Mill Hydrogeologic Site Conceptual Models*, January 8, 2018, Brown & Caldwell (ML18025B339)
2. Submittal of Groundwater Model Work Plan: Completed March 2018 – *Groundwater Flow and Transport Modeling Work Plan*, Homestake Mining Company of California, March 2018 (ML18093A641)
3. Groundwater CAP contractor selection – December 18, 2018;
4. Groundwater CAP Table of Contents – January 31, 2019;
5. Preliminary Groundwater Modeling Results, Lower San Mateo Creek Basin, Grants Reclamation Project – March 4, 2019;
6. Preliminary Groundwater Modeling Results, Upper San Mateo Creek Basin – June 03, 2019;
7. Draft Groundwater CAP – September 03, 2019.

Thank you for your time and attention on this matter. If you have any questions, please contact me via e-mail at [twohlford@homestakeminingcoca.com](mailto:twohlford@homestakeminingcoca.com) or via phone at 505.290.2187.

Respectfully,



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Copy To:

NRC Document Control Desk (Hard Copy)  
R. Linton, NRC (electronic copy)  
A. Winton, NMED (electronic and hard copy)  
M. Purcell, EPA (electronic copy)  
M. McCarthy, Barrick, Salt Lake City, Utah (electronic copy)  
G. George, Davis Wright Tremaine, San Francisco, California (electronic copy)  
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G. Hoffman, Hydro-Engineering, Casper, Wyoming (electronic copy)  
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