From:	Browder, Rachel
To:	"estowe@mountainwtr.com"
Cc:	Grossman, Christopher; Torres, Roberto; Katanic, Janine; Silva, Patricia
Subject:	small quantities of source material
Date:	Thursday, March 07, 2019 5:40:00 PM
Attachments:	ris200620-r1.pdf Standard Review Plan for Source Material Licenses_1987.pdf RG 10-4 Rev 3_ML083650402.pdf RG 10-4 Rev 2_ML003740371.pdf

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Mr. Stowe,
Thank you for the discussion today regarding the options you are considering to remove uranium from drinking water system and the different disposal options. Just briefly, I understood that the city had drilled a well in an aquifer that's in an oxidized state, containing uranium levels of approximately < 30µg. The well has the capacity to produce approximately 2,000 gpm; however, it is not being used since the EPA promulgated it's rules that limited the amount of uranium in drinking water. In order to use the well, the different options you are considering involve blending for dilution and/or setting up an ion exchange system; however, all of these options involve disposal questions (e.g., brine and/or resins).

I've attached a couple of documents, that you may be familiar with already, basically covering the regulations and licensing guidance documents.

(1) Regulatory Issues Summary 2006-20, Rev 1, "Guidance for Receiving Enforcement Discretion when Concentrating Uranium at Community Water Systems." (please note that this RIS has some information; however, there is no longer discretion necessary since the regulations under 10 CFR 40.22 have been updated.)

(2) The regulations under 10 CFR 40.22, [10 CFR 40.22] provides information involving the quantities of uranium and thorium that are allowed under a general license. Please note, a general licensee must implement the regulations as stated in the pertinent section; however, there is no license application, frequency of inspection, nor fees associated with the general license.

(3) If a specific license is necessary, because you may be handling either: (1) greater concentration than 0.05% by weight, or (2) greater than the total pounds allowed under the general license requirements, or (3) need to dispose of greater than the quantity allowed under the general license requirements, then the specific licensing guidance documents are as follows. In addition, it may take greater than 90-days to authorize the specific license, depending on your request and whether environmental assessment is necessary, in order for the agency to be compliant with the National Environmental Policy Act (NEPA).

- Standard Review Plan for Source Material Licenses (1987) (ADAMS Accession Number ML17100A285)
- Regulatory Guide 10-4, Revision 2 and Revision 3

(4) The fees associated with a specific license are assessed every year and are published in 10 CFR 170.31 and 10 CFR 171.16. Not knowing exactly what your Program Code might be; however, as an example you may potentially fall under Category 2.F., "all other source material licenses." Therefore, based on the regulations published on our website, the fees for Category 2.F. would be:
10 CFR 170.30 (application fee): $2,600.00

10 CFR 171.16 (annual fee): $9,600.00

We'd appreciate further discussion on your proposed project. Your suggestion of summarizing the tentative options and your specific questions will allow us to provide a more succinct response and have a better discussion with you. I've included a couple of others on this email. If you could reply to all, we'd appreciate it.

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Mr. Roberto Torres, Sr. Health Physicist, NRC/Region IV/Division of Nuclear Materials Safety
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Sincerely,
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