



Grants Reclamation Project

Homestake Mining Company of California

David W. Pierce  
Closure Manager

April 16, 2020

ATTN: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001Regional Administration, Region IV  
U.S. Nuclear Regulatory Commission,  
1600 East Lamar Blvd.  
Arlington, TX 76011-4511Mr. Ron Linton, Project Manager  
Project Manager, Materials Decommissioning Branch  
Decommissioning, Uranium Recovery & Waste Programs  
Office of Nuclear Materials Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
MS T-5A10, 11545 Rockville Pike  
Rockville, MD 20852**RE: Reply to NRC Inspection Report 040-08903/2016-001 and Notice of Violation, Homestake Mining Company of California – Grants Reclamation Project: Request for Extension**

Dear Mr. Linton:

Per the March 17, 2020 letter from the U.S. Nuclear Regulatory Commission (NRC) regarding NRC Inspection Report 040-08903/2016-001 and Notice of Violation for exceedance of the 20 pCi/m<sup>2</sup>-s radon flux standard on top of the Large Tailings Pile (LTP), Homestake Mining Company of California (HMC) hereby requests a 90-day extension to prepare a Reply to the March 17, 2020 letter. Reliance of the groundwater restoration program on analytical data from hundreds of monitoring wells on the LTP over the past several years has resulted in a technical and regulatory conflict between meeting the radon flux standard and making progress towards restoration of impacted groundwater.

The presence of the zeolite water treatment facilities on the top of the LTP and a need to routinely operate and maintain this groundwater treatment capability has further complicated placement of the final radon barrier. In addition, NRC's original suggestion to resolve this issue with a specific exemption request per 10 CFR 40.14(a) has been complicated by questions of how to demonstrate compliance with the public dose limit in 10 CFR 20.1301 (to justify the exemption), and given that this demonstration is the subject of ongoing requests for additional information (RAIs) from NRC, it appeared to HMC that the exemption request could not proceed until the public radon dose issue is resolved.

In addition to the above problems, the COVID-19 public health emergency has profoundly impacted Site operations and limited the ability of HMC to engage outside expertise to assist with technical resolution of the above issues and development of a strategy and timeline for achieving compliance with the radon

flux standard. For the above reasons, HMC hereby requests a 90-day extension on submitting a reply to the NRC's radon flux NOV letter of March 17, 2020.

HMC has proactively initiated a special study of changes in radon levels with distance from the centroid of the LTP. The collected data is expected to be important to resolving this NOV along with interrelated regulatory matters as described above and provide measurable data relating to public health and safety. As part of our response in 90 days, HMC will share plans to abandon wells on top of the LTP in anticipation of eventual placement of final cover. The plan will include timelines and goals after it has been properly vetted within HMC.

Thank you for your time and attention on this matter. If you have any questions, please contact me via e-mail at [dpierce@barrick.com](mailto:dpierce@barrick.com) or phone at 505.238.9701.

Respectfully,



**David W. Pierce**

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Copy To:

- M. McCarthy, Barrick, Salt Lake City, Utah (electronic copy)
- G. George, Davis, Wright and Tremaine, San Francisco, California (electronic copy)
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