



Homestake Mining Company of California
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April 22, 2021

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

Mr. Ron Linton
Project Manager
U.S. Nuclear Regulatory Commission
Decommissioning, Uranium Recovery & Waste Programs
Office of Nuclear Materials Safety and Safeguards
MS T-5A10, 11545 Rockville Pike
Rockville, MD 20852

**RE: Homestake Mining Company of California – Grants Reclamation Project –
Withdrawal of License Amendment Request: License Condition 32: Modification
of Radiation Safety Technician Qualifications, Docket No. 40-8903, License No.
SUA 1471**

Dear Mr. Linton:

Per the discussion between the Nuclear Regulatory Commission (NRC) and Homestake Mining Company of California (HMC), HMC is hereby withdrawing the August 12, 2020 request to amend NRC License SUA-1471 for the Grants Reclamation Project (Site) with respect to License Condition (LC) 32 and modification of the qualifications required for the Radiation Safety Technician (RST) position at the Site (ADAMS Accession No. ML20225A272).

However, HMC would like to retain the request specified in HMC's response to NRC's Request for Supplemental Information (RSI), provided in the January 21, 2021 application (Attachment 1), with respect to replacing the current reference in LC 10 to the 1993 application for Amendment 16 (ML080030029) with reference to the approved 1995 application for Amendment 21 (ML080030063). Amendment 21 was approved by NRC to supersede Amendment 16 to reflect reduced occupational radiation protection program requirements, as specified in Table 3 of the 1995 application for Amendment 21; therefore, the request simply proposes an administrative amendment to the LC10 language to reflect the applicable, previously approved, occupational radiation protection program as defined in Amendment 21.

HMC would also like to reiterate previously expressed concerns that, as referenced in LC 32, NRC Regulatory Guides 8.22, 8.30 and 8.31 have many specifications no longer applicable to the site since it has not been an operating uranium mill for decades. We have unsuccessfully

attempted to amend this license condition several times to remove/modify some of the nonapplicable guidance, a potential source of continuing violations unrelated to current Site activities and conditions. As NRC noted in approving Amendment 21, many license conditions are related to activities at the mill processing buildings and/or operations and reclamation work has reduced the radiological hazards present at the mill site; therefore, it was appropriate that the license conditions associated with the request for Amendment 21 should be removed. HMC is committed to operating the Site in accordance with our license and partnering with the NRC to ensure that the license conditions and NRC oversight are appropriate for the operation of the Site as a former uranium mill undergoing closure activities.

Thank you for your time and attention on this matter. If you have any questions, please contact me via e-mail at bbingham@homestakeminingcoca.com or via phone at 505.290.8019.

Respectfully,



Brad R. Bingham
Closure Manager
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