



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

July 14, 2021

MEMORANDUM TO: Docket: 040-08903  
License: SUA-1471, Amendment 57  
Licensee: Homestake Mining Company of California  
Facility: Grants Reclamation Project, Grants, NM

FROM: Bill Von Till, Branch Chief  
Uranium Recovery and Materials  
Decommissioning Branch  
Division of Decommissioning, Uranium Recovery  
and Waste Programs  
Office of Nuclear Material Safety  
and Safeguards

A handwritten signature in black ink, appearing to read "Bill Von Till".

Signed by Von Till, Randolph  
on 07/14/21

SUBJECT: NUCLEAR REGULATORY COMMISSION STAFF EXPLANATION FOR  
WHY ACTIONS QUALIFIED FOR SELECTED CATEGORICAL  
EXCLUSION: AMENDMENT 57 TO SOURCE AND BYPRODUCT  
MATERIALS LICENSE NO. SUA-1471, HOMESTAKE MINING  
COMPANY OF CALIFORNIA, GRANTS RECLAMATION PROJECT,  
GRANTS, NEW MEXICO

The purpose of this memorandum is to document the basis for the U.S. Nuclear Regulatory Commission (NRC) staff's conclusion with respect to the satisfaction of the categorical exclusion criteria under paragraph Title 10 of the *Code of Federal Regulations* (10 CFR) Part 51.22(c)(11). This basis is also described in the Safety Evaluation Report for this amendment request. The staff has determined that Amendment 57 to License SUA-1471 qualifies for categorical exclusions under 10 CFR 51.22(c)(11) because the amendment pertaining to License Condition (LC) 16 is organizational and procedural in nature, and the amendments pertaining to LC 10 and LC 42 are administrative in nature. Further, each of these amendments meet the four specific criteria in 10 CFR 51.22(c)(11), as explained below:

- There is no significant increase in the types or amounts of any effluents that may be released offsite;

The LC 16 amendment approves the Homestake Mining Company of California (HMC), Grants Reclamation Project (GRP), proposed program for the performance of safety and environmental reviews by a formal panel made up of members of management, safety and technical staff. This safety and environmental review panel (SERP) is charged with the

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responsibility to review and determine prior to making any proposed changes in facility operations, systems, equipment, infrastructure or procedures, or conducting tests or experiments if the proposed activities can be performed under the license as written or if a license amendment needs to be requested from the NRC.

The LC 42 amendment includes provisions related to SERP evaluations into the annual reporting requirements.

The LC 10 amendment reinserts a license tiedown related to a previous approval for changes in the monitoring program that was removed in error during a past license amendment. Specifically, license amendment 21 dated May 5, 1995, approved changes to Table 3 removing workplace sampling and survey requirements that were no longer necessary since the facility had transitioned from a working mill to a decommissioning mill. The license amendment tied the revisions to Table 3 to LC 35A. In license amendment 31 dated June 24, 1998, License condition 35A was revised and the tiedown to the 1995 changes to Table 3 were inadvertently removed. Since the revisions to LC 35A are associated with groundwater only and Table 3 was originally tied down in LC 10, the license was corrected to note this tiedown in LC 10.

None of these amendments relate to the release of effluents at the GRP. Therefore, this action will not result in a significant increase in the amounts of any effluents that may be released offsite.

- There is no significant increase in individual or cumulative occupational radiation exposure;

The LC 16 amendment implements the HMC GRP proposed program for the performance of SERP evaluations.

The LC 42 amendment inserts annual reporting requirements related to SERP evaluations performed since the previous reporting period.

The LC 10 amendment reinserts a license tiedown that was removed in error as part of a past license amendment.

None of these amendments will result in significant increase in individual or cumulative occupational radiation exposure at the GRP. Therefore, these actions will not result in a significant increase in individual or cumulative occupational radiation exposure.

- There is no significant construction impact;

The LC 16 amendment implements the HMC, GRP proposed program for the performance of SERP evaluations.

The LC 42 amendment inserts an annual reporting requirements associated with the submittal of SERP evaluations performed since the previous reporting period.

The LC 10 amendment reinserts a license tiedown that was removed in error as part of a past license amendment.

Approving these amendments as described in this review will not involve construction activities. Therefore, this action will not result in a significant construction impact.

- There is no significant increase in the potential for or consequences from radiological accidents.

The LC 16 amendment implements the HMC, GRP proposed program for the performance of SERP evaluations. The revised language specifically excludes the use of the SERP evaluation process to approve activities that could increase the possibility, likelihood or consequences of an accident or malfunction.

The LC 42 amendment inserts an annual reporting requirements associated with the submittal of SERP evaluations performed since the previous reporting period.

The LC 10 amendment reinserts a license tiedown that was removed in error as part of a past license amendment.

The licensee is not requesting any changes to the radiation safety program at the GRP beyond the approval to allow HMC to perform SERP evaluations to determine if a change can be made under the license as written or an NRC license amendment is necessary.

Pursuant to staff memorandum dated February 28, 1984,<sup>1</sup> SECY-83-286, and guidance in NUREG-1748, as designee for the Division Director, this memorandum documents my concurrence with the staff's evaluation. This memorandum will be placed as a publicly available record in Agencywide Documents and Management System (ADAMS) under the above referenced docket and linked to the Amendment 57 package.<sup>2</sup>

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<sup>1</sup> ADAMS Accession No. ML20044G949.

<sup>2</sup> ADAMS Package Accession No. ML21155A082.