



Written Statement to the National Remedy Review Board

Homestake Mining Company of California

March 10, 2021

Site Overview

Homestake Mining Company Superfund Site, also known as Grants Reclamation Project, (the “Site”) is located in Cibola County, New Mexico, approximately 5.5 miles north of the Village of Milan. Homestake Mining Company of California (HMC), and others (through partnerships), operated the uranium processing mill at the Site from approximately 1958 to 1990. The mill historically supplied uranium primarily to the United States for weapon-making during the Cold War era. The Site consists of three operable units: groundwater aquifers (OU1); long-term tailings stabilization, surface reclamation and site closure (OU2); and radon concentrations in neighboring subdivisions (OU3). EPA issued a ROD for OU3 in September of 1989 requiring no further action. The focus of HMC’s current work is OU1 and OU2, and as such, this memorandum is limited in scope to these operable units. The Site presently consists of the large tailings pile (LTP), small tailings pile (STP), reverse osmosis groundwater treatment system, zeolite groundwater treatment system, and multiple evaporation ponds.

Regulatory Oversight & Status

The Site is under the often-conflicting federal jurisdiction of the Nuclear Regulatory Commission (NRC), formally the Atomic Energy Commission (AEC), through the Uranium Mill Tailings Radiation Control Act (UMTRCA) and the Environmental Protection Agency (EPA) through the Environmental Response, Compensation, and Liability Act (CERCLA). In addition to the dual-federal regulation, the Site is subject to New Mexico State regulation under its Discharge Permit-200 (DP-200) by New Mexico Environment Department (NMED), as well as the State’s participation as provided under CERCLA.

UMTRCA authorizes NRC to regulate byproduct material at uranium processing sites through production, reclamation, and disposal phases. AEC initially issued Source Materials License SUA-708 in 1958 to address uranium milling operations at the Site. From 1974 to 1986, the State, with delegated authority from NRC, regulated uranium milling operations at the Site (operating as what is known as an “Agreement State”).

In 1983, EPA listed the Site on the National Priorities List (NPL) because of New Mexico’s Agreement State status. EPA generally defers listing on the NPL sites subject to NRC licensing authority; however, this deferral policy does not apply to sites in “Agreement States” where NRC has delegated oversight authority to a state. New Mexico was an “Agreement State” until June 1, 1986 (after EPA listed the Site on the NPL). The Site remained on the NPL thereafter, putting it in the unusual position of being under NRC’s direct oversight while also subject to EPA oversight as an NPL site even after the State relinquished its licensing authority.

In 1993, NRC and EPA entered into a memorandum of understanding (MOU) delineating each agency’s responsibility in remediation activities. According to the MOU, NRC would take the “lead regulatory agency” role. EPA would monitor remedial and reclamation activities required by NRC and provide reviews and

comments directly to NRC. EPA would also have authority to “take whatever action it deems appropriate” “[i]n the event that EPA determines that the implementation of the site reclamation plan, closure activities, and/or groundwater corrective action has not resulted in, or may not result in, cleanup conditions that meet applicable or relevant and appropriate requirements.”

The Site is presently undergoing reclamation, groundwater corrective action (with a Corrective Action Plan submitted November 13, 2020 and Alternate Concentration Limit (ACL) application forthcoming), and closure pursuant to NRC Source Materials License SUA-1471, as amended. The Site is further regulated by EPA as it meets its requirements under the National Contingency Plan (NCP), CERCLA’s implementing regulations, to allow delisting from the NPL.

The Site’s extensive regulatory oversight, particularly that of two different federal agencies and statutory schemes governing remediation, is a regulatory anomaly, and the reason for its occurrence is long gone. As explained, EPA listed the Site on the NPL because of New Mexico’s status as an Agreement State with delegated authority from NRC. Like other Title II UMTRCA sites, had NRC never delegated its authority, the Site would not be listed on the NPL and would not be under EPA’s CERCLA jurisdiction. Even though NRC resumed authority and New Mexico is no longer an Agreement State for the purposes of uranium mill tailings, the Site remains on the NPL. There is only one other site in the entire country caught by this particular regulatory limbo (Church Rock, New Mexico).¹ There is no substantive, legal justification for this dual regulation where all other similar Title II UMTRCA site are under the sole federal oversight of NRC. No unusual or extraordinary risks exist at this particular Site justifying additional oversight and dissimilar treatment from all other Title II UMTRCA sites. Despite this, HMC acknowledges its need to meet its CERCLA obligations in order to reach NPL delisting.

These jurisdictional conflicts between EPA and NRC reached an apparent impasse in 2012. At this time, EPA and NRC contemplated consecutive, as opposed to concurrent processes (including a potential license abeyance), which would have resulted in decades delay and uncoordinated oversight. As a result, HMC proposed to both agencies pursuing “CERCLA equivalency,” a legal mechanism to harmonize the two federal processes. Under 40 CFR § 300.700(c)(3), “[a] private party response action will be considered ‘consistent with the NCP’ if the action, when evaluated as a whole, is in substantial compliance with the applicable requirements [of the NCP], and results in a CERCLA-quality cleanup.” With equivalency, HMC seeks to simultaneously meet EPA’s obligations under CERCLA while achieving its NRC obligations under UMTRCA. In practicality this means that HMC utilizes investigation, data gathered, and work performed for NRC (with EPA concurrence) under UMTRCA, supplementing as necessary to fill data gaps, to produce a CERCLA administrative record. Through this equivalency approach, the NRC process remains the lead, via the agencies MOU, but allows EPA to also achieve its goals parallel to the NRC actions without unnecessary redundancies. As both legal authorities oversee HMC’s surface and groundwater remediation, the concurrent progression of these two regulatory processes is critical in order to ensure a consistent remedy and nonconflicting site standards.

¹ Two sites are listed on the NPL as well as regulated by Agreement State Colorado (Umetco in Uravan, and Cotter Uranium Mill in Canon City). Their NPL listing (and consequently their EPA oversight) are consistent with EPA policy to list sites in Agreement States and are not subject to dual-federal agency oversight.

To that end, HMC has prepared, in cooperation with EPA Region 6, the following CERCLA- and NCP-compliant documents:

- Remedial Investigation (RI) (including Human Health Risk Assessment; Conceptual Site Model; Baseline Ecological Risk Assessment) – approved by EPA June 15, 2020;
- Candidate Technologies Memorandum – submitted to EPA and acknowledged in Statement of Work (SOW) ¶ 19; and
- Entered into Administrative Settlement and Order on Consent (AOC) and corresponding SOW for preparation of a Feasibility Study (FS), including Technical Impracticability Waiver Evaluation Report (TI Waiver Report) – effective August 12, 2020. Under the AOC, HMC has submitted the following deliverables:
 - Draft Screening of Remedial Alternative Memorandum – revised version addressing EPA comments submitted to EPA, and EPA acknowledged satisfaction of SOW requirement on September 2, 2020;
 - Draft TI Waiver Report – submitted on Nov. 16, 2020 and awaiting EPA comment; and
 - Draft FS – submitted on Dec. 15, 2020 and awaiting EPA comment.

HMC seeks to continue its cooperative path with all agencies and appreciates its collaborative relationship with EPA. Recognizing the technological limitations, persistent contaminant sources, and hydrogeologic complexity all affect remediation efficacy of the Site contaminants, HMC is pursuing an ACL from NRC. Similarly, to move this Site to closure under CERCLA, a technical impracticability (TI) waiver of groundwater Applicable or Relevant and Appropriate Requirements (ARARs) is appropriate both from a technical standpoint and a CERCLA equivalency perspective to align these competing regulatory processes and arrive at a consistent remedial strategy that is protective of human health and the environment.² HMC continues to urge EPA, and particularly the NRRB, to approach Site decisions recognizing that HMC is diligently pursuing a parallel, equivalent, and protective process under NRC's implementation of UMTRCA.

History of Remediation

Surface

Under NRC oversight with review and consent from the EPA and NMED, between 1988 and 1993, HMC excavated windblown materials with elevated radium-226 concentrations in areas adjacent to the tailings piles and placed the soil on the piles. HMC removed surface soil from approximately 1,200 acres of land. This resulted in the cleanup of surface soils to an average radium-226 concentration of 1.11 pCi/g (standard deviation 1.05 pCi/g) for the inner zone of the cleanup area and 2.95 pCi/g (standard deviation 1.89 pCi/g) for the outer zone of the cleanup area, based on verification soil sampling that was biased high (ERG 1995).

Between 1993 and 1995, HMC, with each agencies' review and consent, decommissioned and demolished the mill facilities. HMC excavated an average of two feet of contaminated soil (containing elevated radium-226 concentrations) from mill area following the completion of demolition. Excavated soils were transported to the LTP and STP for burial. HMC stabilized the tailings piles by regrading and placing soil covers and rock on

² Of note, NMED has an analogous regulatory process known as an Alternative Abatement Standard (AAS). HMC has begun discussions with NMED as to its path to meet NMED's process as well, which may include reliance on HMC's TI waiver and/or ACL processes to avoid duplicative efforts.

the side slopes for erosion protection. One foot of soil cover was initially placed on top of the LTP. Additional cover material was placed on top of the pile to fill in depressions caused by settlement, improve drainage, and address specific area with elevated radon flux measurements. Excavated areas were backfilled with alluvial soils, as well as rock for erosion protection.

HMC refers the Board to its draft FS for future discussion of planned surface remediation for OU2 as the remainder of this document focuses on HMC's groundwater remediation efforts.

Groundwater

Remediation and monitoring activities began around 1976 under applicable state and federal licenses and authorities. For over four decades, HMC has conducted extensive groundwater remediation, expanding and improving its remediation as follows:

- **1975 – HMC began providing bottled water to residents of nearby subdivisions upon request.**
- **1976 – HMC entered into agreement with NMEID to provide bottled water to residents located hydraulically downgradient of the source areas.**
- 1977 - Water is added into the alluvial aquifer to create a hydraulic barrier to limit the movement of contaminated groundwater.
- **1977-1983 - Multiple hydraulic extraction wells were installed in the alluvial aquifer.**
- 1984 - Hydraulic containment of the Upper Chinle aquifer was initiated.
- **1986 - Extension of the Milan water supply to the Broadview Acres, Felice Acres, Murray Acres, Valle Verde, and Pleasant Valley Estates subdivisions was initiated.**
- 1990 – Evaporation Pond EP-1 was constructed within the footprint of the STP to assist in the dewatering of the LTP and to hold water pumped from the collection wells.
- 1992 - Toe drains were installed around the tailings (LTP/STP).
- 1993-2000 - During this period, corrective action and monitoring well networks were revised through addition and abandonment of wells.
- 1994 - HMC completed bench-scale treatability testing for ion exchange and activated alumina.
- 1996 - Use of Evaporation Pond EP-2 began in March.
- 1999 - The reverse osmosis (RO) treatment unit was added; treated water is used for hydraulic containment of the alluvial aquifer.
- 2000 - Irrigation of 270 acres groundwater was initiated as a means to manage extracted groundwater. HMC began flushing program.
- 2000-2015 – Tailings flushing of the LTP was conducted where water was introduced into the LTP to expedite the mass flux of contaminants from the tailings.
- 2002 - 60 acres of irrigation area were added and added an additional RO skid to plant for increased treatment rate.
- 2002-2009 - During this period, corrective action, and monitoring well networks were revised through addition and abandonment of wells.
- 2004-2005 - 64 acres of irrigation area were added.
- **2006 - EPA, NMED, and NRC approved site groundwater standards.**
- 2010 - Evaporation Pond EP-3 was constructed and commissioned.
- 2012 - Land Application program ceased operation.
- 2012 - 300 gpm Zeolite pilot treatment started operation.

- 2015 - RO Plant was expanded to a theoretical maximum throughput of 1200 gpm with the addition of a 600 gpm low pressure skid, a 250 gpm high pressure skid, and two microfiltration skids to replace the existing sand filters amongst other updates.
- 2016 - Zeolite system with a theoretical maximum throughput of 1200 gpm started operation for off-Site water treatment.
- 2016 - EPA initiated background reassessment study (USGS split sampling event).
- **2018 - HMC (Arcadis) borehole development and geophysics programs near wells DD and DD2 (Controls on Groundwater Background Constituent Concentrations due to Mineralogy Local to Monitoring Wells).**
- **2019 - In collaboration with EPA, HMC conducted additional field investigations to expand the characterization of the soils east of wells DD and DD2, across the alluvial channel (Supplemental Background Soil and Groundwater investigation Report Grants Reclamation Project).**

Path Forward: Technical Impracticability Waiver

After 40+ years of progressive remediation and investigation at the Site, it has become apparent that there are technical barriers to achieving groundwater ARARs. As required by its AOC with EPA, HMC submitted a Draft TI Waiver Report on November 16, 2020 for EPA's review, comment, and approval. HMC seeks to waive the following ARARs:

- **Safe Drinking Water Act**
 - **40 CFR § 141, Subpart B** – sets Maximum Contaminant Levels and non-zero Maximum Contaminant Level Goals.
 - **40 CFR § 192** – sets standards for the protection of public health, safety and the environment from radiological and non-radiological hazards associated with uranium and thorium ore processing, and disposal of associated wastes, including setting the standard for molybdenum.
- **New Mexico Water Quality Act, § 20.6.2.3103 NMAC** – sets state water quality standards.
- **10 CFR Part 40, Appendix A, Criterion 5B(5) (establishes concentration limits to be used for groundwater protection at uranium mill tailings sites)** – provides that “At the point of compliance, the concentration of that constituent in the groundwater must not exceed—(a) *The Commission approved background concentration of that constituent in the groundwater*; (b) The respective value given in the table in paragraph 5C if the constituent is listed in the table and if the background level of the constituent is below the value listed; or (c) An alternate concentration limit established by the Commission,” which sets the standard for uranium as background.

Unlike almost any NPL site that has come before it, this Site benefits from 40+ years of extensive investigation, monitoring, and on-the-ground application of its remedial strategy. While other sites select remedies and make TI waiver determinations based on projection, HMC's draft TI Waiver Report and alternatives evaluation is based on the more than 40 years of groundwater remediation and investigation (applying an exhaustive list of remediation technologies: RO treatment, Zeolite treatment, ion exchange, in situ phosphate treatment, in situ bioremediation, amongst others), and conducting three treatability studies (Tripolyphosphate, Electrocoagulation, and In-situ biological treatment). EPA guidance distinguishes between “front-end” (those that are granted at the Record of Decision (ROD) stage and “back-end” (those that are granted subsequently after remedy implementation) TI waivers, suggesting a preference for “back-end” TI waivers once the remedy's efficacy is best understood. While the Site does not have a formal ROD, for all

intents and purposes this is a back-end TI waiver. As mentioned and detailed above, HMC has remediated already for over four decades. Neither more time nor investigation will yield greater certainty.

HMC encourages the Board to review its draft TI Waiver Report for a detailed explanation of HMC's technical basis for a TI waiver. Distilled to its simplest form, modeling demonstrates that ARARs cannot be achieved in a reasonable timeframe. The 1st Order of Decay Analysis predicts 210 years for uranium and 360 years for molybdenum to achieve *present* cleanup standards. EPA, NMED, and NRC approved site standards for each constituent of concern (COC) in 2006 based on an evaluation of background water quality (HMC and HE 2003; HE 2001; ERG 2003; ERG 2002; ERG 1999). The standards were incorporated into the radioactive materials license via license amendment number 39 as groundwater protection standards and New Mexico DP-200. EPA expressed concern with background levels in 2013. Homestake has endeavored to resolve EPA concerns since, with renewed focus and extensive investigation beginning in 2018. HMC maintains that the current background levels, previously accepted by all agencies, are scientifically defensible and represent the natural heterogeneity of the alluvial aquifer. Regardless, HMC evaluated the technical impracticability of achieving the background levels established in 2006—if HMC cannot meet these cleanup levels, it surely cannot meet more stringent standards contemplated by EPA, making continued investigation into this issue moot. A decision to change background levels for the purpose of HMC's CERCLA cleanup unnecessarily runs contrary to the objective of achieving a parallel regulatory process with lead-agency NRC and could result in an inconsistent remedy and/or site standards—all without apparent benefit to protecting human health and the environment.

Ultimately, even if cleanup standards could be achieved, the result would be temporary and contamination to groundwater would continue after the groundwater treatment systems were shut off. HMC cannot remediate the primary sources (LTP and STP) or the secondary source (vadose and silt/clay in the alluvial aquifer beneath the LTP). The viability of moving the LTP has been sufficiently analyzed and determined to be impracticable. Most recently, Tetra Tech on behalf of HMC (Tetra Tech 2012), dismissed moving the LTP for the following reasons:

- **Additional risk to human health:** The potential risk to human health risk is significant. The increased cancer risk to workers involved with tailings excavation and placement is 1 in 10. The increased cancer risk to nearby residents is approximately 1 in 100 based on exposure to radioactive material.
- **Potential ecological damage:** Relocating tailings would require extensive amount of land that will be irretrievable committed for perpetuity as a disposal cell. Removal of habitat will potentially affect native wildlife and vegetation.
- **Potential damage to cultural resources:** Relocating tailings could negatively affect the large number of cultural resources in the area including federal and state parks and tribal lands.
- **Potential impacts from increased truck traffic:** Truck traffic to move tailings would be large and noticeable. This would include additional noise impacts, negative air quality, and potential for accidents and accidental releases. The potential impacts are not as great with rail, but increased activity would impact community and increase potential for traffic accidents and accidental releases.
- **Potential Regulatory Challenges:** Siting studies, public hearings, and environmental reports and preconstruction monitoring has been estimated to take up to seven years. The construction of cell has been estimated to take up to three years, and it has been estimated to take up to two years to move the LTP.
- **Carbon Footprints:** Offsite disposal would require greater use of consumable materials and fossil fuel and result in greater greenhouse emissions.

- **Potential Impact to Community:** Construction at new site would result in negative noise and vibration impacts to residents and wildlife.
- **Cost prohibitive:** The estimated costs range from \$1.8 billion (truck transport) to over \$2 billion (rail and slurry pipeline transport).

Similarly, in 2009, U.S. Army Corps of Engineers (ACOE), on behalf of EPA, reviewed the remediation efforts at the Site, issuing a final report in 2010 (ACOE 2010). ACOE presented alternate strategies to the current groundwater restoration program, including relocation of tailings to an engineered landfill within 30 miles of the Site. ACOE concluded, "Relocation of the tailings should not be considered further by any means given the risks to the community and workers and the greenhouse gas emissions that would be generated during such work." EPA (EPA 2011) and NRC (NRC 2011) agreed with this recommendation. NMED supported EPA's recommendations by letter to NRC dated April 20, 2011 (NMED 2011).

Additionally, NRC considered moving the LTP in 1993, concluding based on the costs and benefits associated with the proposed reclamation options (reclamation in place, slurry relocation to the alternative offsite location, or conventional earthwork relocation to the alternative offsite location) that the additional costs of relocation outweighed any minor benefits that would result from relocation.

Not only is this primary source impracticable to remediate, HMC cannot remediate the secondary source (the vadose and silt/clay in the alluvial aquifer beneath the LTP) even if HMC could remove the LTP. COPCs/ROPCs have adsorbed to the unsaturated soil and diffused into the pore-water in the silt/clay, making groundwater restoration an unachievable goal.

Further, increased remediation system capacity will not overcome impracticability. The treatment rates used in the updated modeling efforts are approximately 50% higher than the peak annual average actually achieved onsite since the expansion of the treatment systems. Alternative 5 from the draft FS shows that even with the overly-optimistic assumption that 50 years of pumping removes all contamination in the mobile domain (coarse grained material)—a timeframe unsupported by the 1st order decay analysis or the groundwater model—the back-diffusion from the immobile domain (fine-grained material) and the continued seepage from the LTP would generate a new plume following cessation of remediation. As a result, ARARs would still be unattainable, a TI waiver would be needed, and groundwater access would need to be limited to ensure protectiveness resulting in the same remedy implementation regardless of remediation system capacity. The various alternatives analyzed in HMC's draft FS show that while concentrations within the footprint of the plume may vary, the footprint of the plume above background and/or a protective standard remains largely unchanged even if system capacity is increased.

Increased system capacity may even have negative consequences to water resources in the area. Historic groundwater remediation at the Site has evaporated approximately three billion gallons of water, the equivalent of three years of combined consumption from the nearby municipalities of Grants and Milan. Each additional year of remediation at the Site commits approximately 105 million gallons to evaporative loss in an arid desert region where total precipitation is typically less than 12 inches a year. While the groundwater within the TI zone may not be usable at its present concentrations, downstream beyond the TI zone will be a useable resource. Continued pumping and evaporation would remove billions of gallons, including useable groundwater, from the region's water supply entirely.

Ultimately, future remediation will not result in attainment of ARARs, and the measures needed to ensure protectiveness of human health and the environment remain the same regardless of continued remediation. HMC has already completed the following steps in order to protect potential receptors:

- **Land purchase:** HMC currently owns approximately 74% (4,200 acres of the total 5,700 acres) of the land within the LTC/TI Zone Boundary.
- **Alternative groundwater supply:** HMC has connected all residents in the neighboring subdivisions to municipal water.

Additionally, in 2009, NMED issued a Health Advisory, notifying private well owners of potential contaminant concentrations above federal drinking water standards, and in 2018, the Office of the State Engineer issued an Order restricting well drilling in the Alluvial and Chinle aquifers within an area where groundwater is impacted by historical uranium milling and mining activities.

As next steps, HMC proposes the following protectiveness and exposure control actions:

- Continued property acquisition;
- Water well abandonment;
- Point of use treatment if necessary; and
- Water use restrictions including restrictive covenants.

Together, these measures will protect human health and the environment.

Proposed Remedy

HMC refers the Board to its Draft FS, submitted December 15, 2020, for a detailed analysis of proposed remedial alternatives. Notably, each alternative does not achieve compliance with ARARs, and thus requires a TI waiver. In summary, based on the results of HMC's robust groundwater modeling and analysis in its draft TI Waiver Report, HMC proposes long-term monitoring coupled with application of the institutional controls detailed above. This remedial alternative will satisfy the threshold criteria:

- **Protectiveness of human health and the environment** – achieved through the institutional controls and confirmed through monitoring; and
- **Compliance with ARARs** – achieved through TI waiver.

Importantly, this alternative will be consistent with the NRC remedial strategy, including the proposed ACLs and established cleanup levels, and will finally make meaningful steps toward regulatory closure after decades of remediation and oversight.

Conclusion

Despite the apparent challenges from coordinating multi-federal agency oversight, neither designed to accommodate the other, HMC has developed a scientifically-supported remedial strategy that offers both an opportunity to protect human health and the environment and close the chapter on more than four decades of investigation, remediation, and use of regulatory resources. HMC appreciates Region 6's, and this Board's, support in achieving this common goal.

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