



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

October 7, 2021

Brad R. Bingham, Closure Manager  
Homestake Mining Company of California  
Grants Reclamation Project  
P.O. Box 98/Highway 605  
Grants, NM 87020

SUBJECT: UNITED STATES NUCLEAR REGULATORY COMMISSION RESPONSE TO THE HOMESTAKE MINING COMPANY OF CALIFORNIA – REQUEST FOR ADDITIONAL INFORMATION RESPONSE FOR PROPOSED LICENSE AMENDMENT TO REMOVE WELL CF4 FROM MONITORING PLAN, DOCKET 04008903, LICENSE SUA-1471

Dear Mr. Bingham:

By letter dated April 22, 2021, the Homestake Mining Company of California (HMC) submitted to the U.S. Nuclear Regulatory Commission (NRC) a license amendment request for review and approval.<sup>1</sup> Specifically, the licensee requested to amend NRC License SUA-1471 for the Grants Reclamation Project with respect to the removal of well CF4 from the monitoring plan specified in Table 2-1 of the Groundwater Monitoring Plan submitted on November 20, 2017,<sup>2</sup> and updated on October 8, 2019,<sup>3</sup> in License Condition 35 A. In its April 22, 2021, request, HMC indicated that well CF4 casing was very likely damaged during maintenance and the water level and water quality in well CF4 is no longer representative of the Upper Chinle Aquifer (UCA). The NRC accepted the application for review and published one Request for Additional Information (RAI) in a letter dated June 15, 2021.<sup>4</sup> On August 27, 2021, the NRC received HMC's response to the NRC RAI.<sup>5</sup>

The NRC staff finds the RAI response adequate, in part. The NRC staff agrees that a replacement well for well CF4 on the large tailings pile (LTP) may not be required. However, the NRC staff has reviewed the existing monitoring wells located near and adjacent to the LTP that are completed in the UCA for a possible replacement well or wells for well CF4 in the Groundwater Monitoring Plan in NRC license SUA-1471, Condition 35 A, and to comply with 10 CFR Part 40, Appendix A, Criterion 7A, that states in part, "The purpose of the compliance monitoring program is to determine that the hazardous constituent concentrations in groundwater continue to comply with the standards set by the Commission."

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<sup>1</sup> Agencywide Documents Access and Management System (ADAMS) Accession No. ML21112A266.

<sup>2</sup> ADAMS Accession No. ML18018A102.

<sup>3</sup> ADAMS Accession No. ML19281C055.

<sup>4</sup> ADAMS Accession No. ML21160A216.

<sup>5</sup> ADAMS Accession No. ML21242A450.

Wells CE7, CE13, and CE17 are located at the downgradient edge of the LTP and provide more direct monitoring data regarding the performance of the groundwater corrective actions than other wells currently in the Groundwater Monitoring Plan. The 2020 Annual Monitoring Report / Performance Review<sup>6</sup> shows well CE7, in particular, with higher concentrations of several constituents of concern (e.g., uranium, selenium, and molybdenum). Accordingly, wells at the downgradient edge of the LTP should provide earlier indication of compliance with the groundwater protection standards and effectiveness of corrective actions than other UCA wells located further downgradient. While wells CE7, CE13, and CE17 have been monitored regularly by the licensee, none of these wells are in the Groundwater Monitoring Plan in Condition 35 A, and monitoring could be discontinued at any time. The NRC staff requests HMC evaluate adding well CE7 into the Groundwater Monitoring Plan as a replacement for well CF4. The NRC staff requests a response within 30 days of the date of this letter.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions regarding this review, please contact me at (301) 415-7777 or by e-mail to [Ron.Linton@nrc.gov](mailto:Ron.Linton@nrc.gov).

Sincerely,



Signed by Linton, Ron  
on 10/07/21

Ron C. Linton, Project Manager  
Uranium Recovery and Materials  
Decommissioning Branch  
Division of Decommissioning, Uranium Recovery  
and Waste Programs  
Office of Nuclear Materials Safety  
and Safeguards

Docket No. 040-08903  
License No. SUA-1471

cc: Homestake ListServ

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<sup>6</sup> ADAMS Accession No. ML21090A190

Homestake Mining Co. of CA - NRC response to HMC - Request for Additional Information response for proposed amendment to remove well CF4 from monitoring plan DATE October 7, 2021

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