

Saxton, John

From: Saxton, John
Sent: Thursday, January 20, 2022 6:12 AM
To: Lux, Jeff J; Smith, James; J. Paul Davis
Cc: Halliburton, Bill; Hesemann, John; Dulle, Eric; Halliburton, Bill; Charles Beatty; Jay Maisler
Subject: RE: Observation re: Groundwater Elevation Data

Jeff,

I want to clarify aspects of the information request so there is no confusion. The decommissioning plan was not accepted because the plan provided confusing and inconsistent methodologies/information for the final stages of decommissioning. Staff's concerns regarding those deficiencies are documented RSI-1 through RSI-4, "**General Deficiencies.**" As noted in the cover letter for the non-acceptance of the plan, Staff thought that a revision could provide a means to remedy other deficiencies in the plan which, by themselves, would not have led to the non-acceptance of the plan. It was hoped that addressing those discrepancies would not add a significant effort for this revision but aid in facilitating the detailed technical review. The fact is a lack of a response to those secondary issues would not result in the revised plan not being acceptable for technical review because those RSIs were never the original reason the plan was not acceptable.

John

From: Lux, Jeff J <jlux@burnsmcd.com>
Sent: Wednesday, January 12, 2022 3:14 PM
To: Saxton, John <John.Saxton@nrc.gov>; Smith, James <James.Smith@nrc.gov>; J. Paul Davis <j.paul.davis@deq.ok.gov>
Cc: Halliburton, Bill <bhalli@burnsmcd.com>; Hesemann, John <jhesemann@burnsmcd.com>; Dulle, Eric <edulle@burnsmcd.com>; Halliburton, Bill <bhalli@burnsmcd.com>; Charles Beatty <cbeatty@enercon.com>; Jay Maisler <jmaisler@enercon.com>
Subject: [External_Sender] Observation re: Groundwater Elevation Data

During our Friday, January 7 meeting to discuss the results of the NRC's pre-application audit, you mentioned that the 2018 *Groundwater Evaluation Update* report presented depth to water (DTW) or groundwater elevation data that were not included in the file "CERT JUL 2021 Evaluated Gauging Data", which was electronically submitted to the NRC on October 4, 2021.

In the NRC's August 11, 2021 request for supplemental information, item RSI -6 read, "*The DP does not provide a listing of groundwater and surface water quality and elevations. Many figures and tables are based on data averaged over several years or a combination of data for individual sampling events, maximum values, or a statistical evaluation of the mean. Please provide a listing of groundwater and surface water quality and elevations, and available boring logs or reference to documents which has been submitted to NRC and contains a boring log. It is preferred that the quality and elevations be submitted in an electronic format (e.g., excel spreadsheet) as well.*"

In previous submittals of the decommissioning plan, groundwater elevation data was only used to develop potentiometric surface maps (presented in Figures 2-9 and 2-10 in the draft *Facility Decommissioning Plan – Rev 3*). During telephone conversations conducted to clarify what information was needed to respond to the NRC's request for supplemental information, you pointed out that the figures depicting potentiometric surface maps included a table listing the mean groundwater elevation data for each monitor well used to generate the potentiometric surface maps. You requested that we provide the NRC the groundwater elevation data upon which those mean groundwater elevations were based.

The spreadsheet "CERT JUL 2021 Evaluated Gauging Data" includes all the groundwater elevation data upon which the mean groundwater elevation data tabulated in Figures 2-9 and 2-10 were based. That is the only groundwater elevation data that was used in the preparation of the decommissioning plan; consequently, we believe that data fully responds to the NRC's request for supplemental information related to the decommissioning plan.

We acknowledge that DTW measurements have been recorded during other sampling events. During a "design investigation" activity performed in 2014, DTW measurements were made over a period of several months as field activities proceeded. Because that groundwater elevation data was collected over an extended period of time, it was not considered representative of a "snapshot" of groundwater elevations for a single monitoring event; it was not included in the evaluated gauging data spreadsheet.

The 2018 *Groundwater Evaluation Update* incorporated groundwater elevation data as far back as 2000 to determine if there is a correlation between saturated thickness or seasonality and contaminant concentrations. Those evaluations were performed at the request of the NRC, and the NRC was satisfied that there is no correlation between saturated thickness or seasonality and contaminant concentrations. That data is not needed to develop a decommissioning plan to remediate groundwater at the Cimarron site.

It would require significant effort (and expense) to go through the records of all prior sampling events to incorporate all past DTW measurements into the evaluated gauging data spreadsheet. The DTW data from all prior sampling events was not used in the preparation of the decommissioning plan and is not relevant to the decommissioning plan. Consequently, we request NRC concurrence that the data provided in "CERT JUL 2021 Evaluated Gauging Data" is sufficient for NRC to conduct both the acceptance review and the detailed technical review of the decommissioning plan.

Jeff Lux, P.E.
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