

UNITED STATES NUCLEAR REGULATORY COMMISSION **REGION IV 1600 EAST LAMAR BOULEVARD** ARLINGTON, TEXAS 76011-4511

October 19, 2022

Sandra L. Ross. PG Site Manager **Rio Algom Mining LLC** P.O. Box 218 Grants, NM 87020

NRC INSPECTION REPORT 040-08905/2022-001 SUBJECT:

Dear Sandra L. Ross:

This letter refers to the U.S. Nuclear Regulatory Commission (NRC) inspection conducted from September 20-21, 2022, at your Ambrosia Lake facility in McKinley County, New Mexico. This inspection examined activities conducted under your license as they relate to public health and safety, the common defense and security, and to confirm compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas, the inspection consisted of selected examination of procedures and representative records, interviews with personnel, and a tour of the site.

The NRC inspectors discussed the results of the inspection with you and members of your staff at the conclusion of the onsite inspection on September 21, 2022. The results of the inspection are documented in the enclosure to this letter. No violations were identified, and no response to this letter is required.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter, its enclosure, and your response if you choose to provide one, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS) accessible from the NRC Web Site at http://www.nrc.gov/reading-rm/adams.html. To the extent possible, your response, if you choose to provide one, should not include any personal privacy or proprietary information so that it can be made available to the Public without redaction.

Should you have any questions concerning this inspection, please contact Ms. Linda Gersey at 817-200-1299 or the undersigned at 817-200-1249.

Sincerely,

Brookhart, Lee signing on behalf of Warnick, Gregory on 10/19/22

Gregory G. Warnick, Chief Decommissioning, ISFSI, and Operating Reactor Branch Division of Radiological Safety and Security S. Ross

Docket No. 040-08905 License No. SUA-1473

Enclosure: NRC Inspection Report 040-08905/2022-001

cc w/enclosure:

Anne Maurer, New Mexico Environment Department Amber Rheubottom, New Mexico Environment Department Santiago Rodriquez, New Mexico Environment Department Joni Tallbull, Department of Energy, Legacy Management Dana Ravelojaona, Department of Energy, Legacy Management Jennifer Graham, Department of Energy, Legacy Management NRC INSPECTION REPORT 040-08905/2022-001, DATED OCTOBER 19, 2022

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U.S. NUCLEAR REGULATORY COMMISSION Region IV

Docket No.:	040-08905
License No.:	SUA-1473
Report No.:	040-08905/2022-001
Licensee:	Rio Algom Mining LLC
Facility:	Former Ambrosia Lake mill
Location:	McKinley County, New Mexico
Inspection Dates:	September 20-21, 2022
Inspectors:	Linda M. Gersey, Health Physicist Decommissioning, ISFSI, and Operating Reactor Branch Division of Radiological Safety and Security
	Randall W. Fedors, Senior Hydrogeologist Reactor Decommissioning Branch Division of Decommissioning, Uranium Recovery and Waste Programs Office of Nuclear Material Safety and Safeguards
Accompanied by:	Gregory G. Warnick, Chief Decommissioning, ISFSI, and Operating Reactor Branch Division of Radiological Safety and Security
	Doug T. Mandeville, Senior Project Manager Uranium Recovery and Materials Decommissioning Branch Division of Decommissioning, Uranium Recovery and Waste Programs Office of Nuclear Material Safety and Safeguards
	Michael M. LaFranzo, Senior Health Physicist Decommissioning, Reactors, ISFSI and Health Physics Division of Radiological Safety and Security US NRC Region III
Approved by:	Gregory G. Warnick, Chief Decommissioning, ISFSI, and Operating Reactor Branch Division of Radiological Safety and Security
Attachment:	Supplemental Inspection Information

EXECUTIVE SUMMARY

Rio Algom Mining LLC NRC Inspection Report 040-08905/2022-001

This inspection was a routine, announced inspection of decommissioning activities being conducted at the former Ambrosia Lake mill in McKinley County, New Mexico. In summary, the inspectors concluded that the licensee was conducting site activities in accordance with license and regulatory requirements.

Management Organization and Controls

• The licensee had sufficient staff for the work in progress. The licensee conducted routine audits and site inspections in accordance with procedural and regulatory requirements. The licensee established and maintained procedures in compliance with license requirements. The licensee established an emergency response program in accordance with procedure requirements. (Section 1.2)

Radiation Protection

• The licensee implemented its radiation protection and training programs in compliance with license and regulatory requirements. Occupational exposures were small fractions of the annual regulatory limits. (Section 2.2)

Radioactive Waste Processing, Handling, Storage, and Transportation

• The licensee conducted field work activities and managed waste material in accordance with license requirements and commitments provided in recent letters to the NRC. (Section 3.2)

Effluent Control and Environmental Protection

• The licensee implemented the environmental and groundwater monitoring programs and reported the results to the NRC as required by the license. Public doses were small fractions of the regulatory limit. The licensee continued to implement a work plan to collect and analyze information for a future application for a change in selected groundwater Alternate Concentration Limits in bedrock units. The licensee conducted a land use survey as required by the license. (Section 4.2)

Report Details

Site Status

The Ambrosia Lake mill processed approximately 33 million tons of uranium ore from 1958-1985. Reclamation of the two tailings cells commenced in 1989, and the mill was demolished in 2003-2004. Reclamation activities were completed in May 2016, with a few minor exceptions.

Since 2016, the licensee implemented several work plans. These work plans included Section 4 supplemental characterization work plan, soil characterization work, and the supplemental alternate concentration limit (ACL) work plan. The inspectors reviewed the status of each work activity during the inspection. The licensee also continued to prepare the construction completion report for future submittal to the U.S. Nuclear Regulatory Commission (NRC) for review and approval. The licensee plans to continue to implement the various work plans, with the goal of submitting the results of the work activities to the NRC under separate correspondence at a later date.

1 Management Organization and Controls (Inspection Procedure 88005)

1.1 Inspection Scope

The inspectors reviewed the licensee's oversite and control of licensed activities.

1.2 Observations and Findings

a. Site Staffing

The organizational requirements are provided in License Condition 10 which references the licensee's letter dated January 13, 1998 (Agencywide Documents Access and Management System [ADAMS] Accession No. ML18292A685). Details of the organization were provided in Section 2.0, "Organization and Management," of the licensee's Radiation Protection and Environmental Monitoring Program Manual (RPEM) dated March 2022. The RPEM provides the required organizational structure, staff responsibilities, and qualifications for selected positions.

At the time of the inspection, site staffing consisted of a combination of licensee personnel and contractors. The site manager was the highest-ranking individual. Other staff assigned to the project included the site principals, site specialists, principal hydrogeologist, and radiation safety officer (RSO). Contractors and consultants were available as needed to provide radiation protection, environmental, groundwater, and site support services. All management level positions were filled, and the licensee had sufficient staff to maintain compliance with license requirements. The inspectors confirmed that the licensee's organization met the requirements provided in the RPEM.

b. Routine Site Audits, Inspections, Reports and Procedures

Title 10 to the *Code of Federal Regulations* (10 CFR) 20.1101(c) requires licensees to periodically (at least annually) review the radiation protection program content and implementation. In addition, Section 3.3 of the RPEM states that the RSO shall prepare an annual report summarizing the results of the radiation protection and environmental monitoring programs for the previous calendar year. The inspectors reviewed the

licensee's most recent annual As Low As is Reasonably Achievable (ALARA) audit during the inspection.

A courtesy copy of the audit was provided to the NRC by letter dated July 25, 2022 (ML22207B873). The annual audit summarized site activities, occupational doses, public dose, radiation work permits (RWPs), contamination surveys, safety/training activities, and site inspections. The report provided adequate summaries of the radiation protection and environmental programs, as well as applicable trends and corrective actions. The inspectors concluded that the licensee conducted the annual program review as required by regulations and the RPEM.

Section 3.3 of the RPEM specifies that the licensee's staff shall conduct routine facility inspections. The RSO conducted facility inspections monthly during periods of onsite licensed activity; otherwise, the inspections were conducted quarterly. The inspectors reviewed the licensee's site inspection records for 2021-2022. The records included observations of site conditions and work in progress at that time. In summary, the licensee's records indicate that the facility had been inspected in accordance with procedural requirements since the last inspection.

License Conditions 10, 14, and 16 require the licensee to establish certain procedures. The inspectors conducted a limited review of the licensee's procedures that were active at the time of the inspection. All active procedures had been updated in March 2022 and were found to be acceptable for the work in progress.

c. <u>Emergency Preparedness</u>

The licensee is not required by the license to establish a formal emergency response program based on current site conditions. However, the licensee maintained an emergency response program through its corporate incident response plan. The inspectors reviewed the status of the licensee's emergency preparedness program.

The licensee maintained an emergency contact list to be used in the event of an emergency. The licensee stated that the primary risks were vehicular interactions due to the site's remote location with limited cell phone reception. Other hazards included interactions with wildlife, lightning strikes, and excessive heat or cold conditions. First aid kits were available at the site and in each company vehicle. In summary, the licensee maintained an emergency preparedness program in accordance with site procedures.

1.3 <u>Conclusions</u>

The licensee had sufficient staff for the work in progress. The licensee conducted routine audits and site inspections in accordance with procedural and regulatory requirements. The licensee established and maintained procedures in compliance with license requirements. The licensee established an emergency response program in accordance with procedure requirements.

2 Radiation Protection (Inspection Procedure 83822)

2.1 Inspection Scope

The inspectors reviewed the licensee's radiation protection and training programs to verify compliance with 10 CFR Part 20 and license requirements.

2.2 Observations and Findings

License Condition 10 requires, in part, that the licensee maintain a health physics program. Details about the program are provided in the licensee's RPEM. The inspectors reviewed the licensee's implementation of its occupational exposure, RWPs, contamination control, and training programs. The licensee eliminated its bioassay and respiratory protection programs in 2016 due to a reduction in onsite activities.

The inspectors reviewed personnel dosimetry records for 2021 through the second quarter of 2022. The licensee monitored workers to demonstrate that occupational exposures were ALARA. The licensee measured occupational radiation exposures using optically stimulated dosimeters. In 2021, the licensee monitored 31 staff and contractors, and the maximum radiation exposure was 6 millirem. These results were well below the regulatory limit of 5,000 millirem per year for total effective dose equivalent exposures.

The licensee conducted air sampling during non-routine work to ensure that no worker received an internal exposure greater than 10-percent of the regulatory limits specified in 10 CFR 20.1201. Breathing zone air sampling was conducted for workers during the construction of roads and paths leading to the drilling pads in support of the cell 4 characterization work. Since the results of air sampling were well below the 10-percent of the limit for the most restrictive radionuclide, the licensee did not assign internal doses to any worker as allowed by 10 CFR 20.1202.

License Condition 15 provides the RWP requirements. Details of this program are provided in Section 3.8 of the licensee's RPEM. Since the previous inspection, the licensee closed two RWPs involving construction of the roads and paths leading to drilling pads and removing the piezometer from 4 locations for sampling. The RWPs provided comprehensive information about radiological conditions, dosimetry and air sampling requirements, and job-specific hazards.

The RPEM does not require routine external radiation surveys unless site conditions change. Since the previous inspection, the licensee's staff conducted external radiation surveys of the waste storage area as part of the quarterly site inspections, in part, to verify that radiation protection practices were being followed.

License Condition 10 provides the training requirements. Details about training are provided in Section 3.1 of the licensee's RPEM. The training included visitor orientation, initial site training, on-the-job training, safety training, and daily job safety training as needed. The inspectors reviewed the licensee's training records for visitor orientation and radiation protection training for site workers. Annual refresher training was provided to site workers in January-February 2022. The RSO tracked training of site workers using a spreadsheet. All training records were found to be complete, and the system for ensuring annual completion of required training for all onsite workers was adequate.

2.3 <u>Conclusions</u>

The licensee implemented its radiation protection and training programs in compliance with license and regulatory requirements. Occupational exposures were small fractions of the annual regulatory limits.

3 Radioactive Waste Processing, Handling, Storage, and Transportation (Inspection Procedure 88035)

3.1 Inspection Scope

The inspectors interviewed licensee representatives, toured the site, and reviewed applicable records to determine if the licensee had established and maintained an effective program for managing radioactive wastes.

3.2 Observations and Findings

The inspectors reviewed the status of the Section 4 property. The licensee submitted a request in 2017 to release the Section 4 property for unrestricted use (ML17340A482). In August 2019 the licensee notified the NRC that the requested information would require the implementation of a work plan to gather additional subsurface information (ML19232A082). The licensee subsequently submitted the work plan to the NRC by letter dated November 1, 2019, describing how it planned to conduct supplemental characterization of the property (ML19311C535). However, the licensee subsequently retracted the 2017 request and 2019 work plan by letter dated October 20, 2020 (ML20321A194). Instead of an unrestricted release, the licensee indicated that it would reconsider its options for a conditional release of the Section 4 property.

During the site tour, the inspectors observed the Section 4 property. Severe storms during July 2021 resulted in a breach of the earthen containment berm used to create a "non-discharging" watershed. Although the event was not reportable to the NRC, the licensee's staff provided a courtesy notification to the NRC project manager. However, the licensee indicated that the event was reportable to the State of New Mexico in accordance with its discharge permit. By letter dated November 22, 2021, the licensee provided details of the precipitation event and the resulting clean up actions (ML21349A059). The inspectors noted that the berm had been repaired as identified in the November 2021 letter.

The inspectors reviewed the status of the licensee's soils characterization work. In 2017, the licensee attempted to implement a final status survey using the methodology described in the Soil Decommissioning Plan (ML18166A182). The preliminary results were found to be problematic due to high error rates and poor correlation between ambient gamma count rates and radionuclide concentrations in the soil. In 2018, the licensee conducted a pilot study to identify possible methods to improve the correlation. In April 2019, the licensee submitted a proposed final status survey work plan for NRC consideration for the windblown tailings affected areas (ML19099A196). The objective of this work plan was to provide information to support a future revision to the Soil Decommissioning Plan. The licensee initially proposed to modify the current final status survey integrated survey approach from unshielded gamma surveys and 5-point composite sampling to a shielded gamma survey and ranked-set sampling approach.

In 2019, the licensee conducted a shielded gamma survey in areas designated as affected by windblown tailings. In 2021, additional field data were collected for analysis of the extent of windblown tailings and estimated soil cleanup volume. This field work included expanded shield gamma surveys, rank set sampling pilot study, and an investigation of the depth of wind-blown tailings. A goal of the 2018-2021 studies was to determine how the contaminated material can be excavated in a cost-efficient manner.

The licensee subsequently submitted the shielded gamma survey data to the NRC by letters dated March 22, 2021 (ML21085A569) and July 27, 2021 (ML21203A050). To supplement the shielded gamma surveys, the licensee will conduct surface and subsurface soil sampling in 2021-2022, in part, to help evaluate the magnitude and usefulness of a site-wide gamma guideline value for use during future reclamation activities. At the time of the inspection, the licensee continued to evaluate the shielded gamma data and its correlation to thorium-230 in soil.

In addition, the licensee conducted a soil depth profile study in 2020-2021, to determine the depth of the radionuclides at different locations. The information may be used, in part, to help identify the best location for cell 4 and eventually propose changes to the Soil Decommissioning Plan. The licensee stated that they plan to use a third party for technical review of the results during 2022-2023.

The inspectors discussed the status of the construction completion report with the licensee. The licensee conducted its review of the construction completion report in phases. The first two phases included a license requirement review and data acquisition and information review. These two phases were completed in 2020. The third phase was a data deficiency review. The licensee reported that it had identified data gaps, for example, it could not locate copies of older NRC licensing technical evaluation reports. The licensee may request NRC support in its efforts to locate these missing licensing records. At the time of the inspection, the licensee continued to identify data gaps.

3.3 Conclusions

The licensee conducted field work activities and managed waste material in accordance with license requirements and commitments provided in recent letters to the NRC.

4 Effluent Control and Environmental Protection (Inspection Procedure 88045)

4.1 Inspection Scope

The inspectors reviewed the licensee's effluent and environmental protection programs to ensure compliance with license and regulatory requirements.

4.2 Observations and Findings

a. Effluent and Environmental Monitoring

The effluent and environmental monitoring program requirements are specified in License Condition 10. In December 2016, the NRC authorized the licensee to discontinue environmental gamma, surface soil, vegetation, and sediment sampling (ML16344A027). In December 2017, the NRC approved the license's request to terminate the environmental air particulate sampling program (ML17293A342).

Beginning January 1, 2018, the licensee monitored only for gaseous radon-222, in addition to groundwater sampling. Clarification information about the sampling program was provided in the licensee's letter dated January 20, 2019 (ML19028A155). Section 4.0 of the RPEM provided detailed instructions for the environmental monitoring program.

The inspectors reviewed the licensee's environmental and effluent monitoring results for second half of 2021 and the first half of 2022 (ML22062B050 and ML22241A029). The licensee collected radon-222 samples at seven sample stations. The licensee also collected duplicate samples at three locations to facilitate assessment of quality control. The inspectors concluded that the radon-222 samples were collected and reported to the NRC in accordance with License Condition 10 requirements. No sample result exceeded the effluent concentration limit provided in Appendix B to 10 CFR Part 20 (1E-08 microcuries per milliliter).

The inspectors reviewed the licensee's public dose assessment in the Calendar Year 2021 ALARA Report (ML22207B873). The licensee's assessment concluded that annual doses to the nearest resident, delivery driver, and occasional visitor from licensed operations were 6.7 millirem or less. These calculated doses were well below the regulatory limit of 100 millirem per year as specified in 10 CFR 20.1301(a).

b. Groundwater Compliance Monitoring- Routine Program

The requirements for the groundwater monitoring compliance program are specified in License Condition 34. The program includes semi-annual sampling of 23 wells in four geological layers: Dakota Formation (KD); Tres Hermanos A (TRA) and Tres Hermanos B (TRB) in the Mancos Formation; and Alluvium. Four of the 23 wells are designated as background wells. License Condition 34.A requires that the samples be analyzed for lead-210, radium-226 and radium-228, thorium-230, natural uranium, several non-radiological chemical constituents, and as-found water conditions (water level, pH, and electrical conductivity). Measurement of gross alpha was exempted from the groundwater compliance program in 2020 by License Amendment 62 (ML20218A586), based on a NRC staff's technical evaluation report (ML20218A570).

License Condition 34.D requires the licensee to submit semi-annual groundwater monitoring reports to the NRC. The program includes criteria for both groundwater protection standards and ACLs; the latter were approved by NRC in 2006 (ML060380387). For wells requiring monthly measurements under License Condition 34.F due to exceedances of the groundwater protection standards (GPSs), the licensee submitted the first and third quarter monthly results in first and third quarter groundwater reports. Monthly results for the second and fourth guarters were provided in the semiannual submissions to the NRC. The inspectors reviewed the semi-annual reports for the second half of 2021 and the first half of 2022 (ML22041A327 and ML22206A098). The inspectors also reviewed the guarterly reports for the third guarter of 2021 and first guarter of 2022 (ML21336A389 and ML22153A069). License Condition 34.D also requires that the semi-annual reports include specific minimum information. The inspectors confirmed that the semi-annual reports included potentiometric surfaces and estimates of groundwater gradients for each unit, hydrographs for the groundwater levels at each well, and tabular and graphical analytical results for ACL constituents. The inspectors concluded that the licensee collected all required samples and reported the

sample results in the quarterly and semi-annual reports for wells and constituents specified in License Condition 34.B.

The licensee monitored the water levels in 40 wells in the alluvium located within and surrounding the site, of which eight are sampled as compliance wells listed under License Condition 34.B. The licensee stated that water levels in the alluvium continued to slowly decline in the past year, which is consistent with the long-term trend since 2006 with the discontinuation of the alluvium corrective action program that previously maintained an artificial groundwater mound in the vicinity of the site. Two more wells became dry by 2022, thus 11 of the 40 wells in the Alluvium were marked as dry. One additional well, one of the compliance wells listed in License Condition 34, filled with mud and had a collapsed collar due to the flooding linked to the July 2021 storm event. The licensee submitted a license amendment request May 27, 2022 (ML22147A179) to replace well 05-04 ALL with a well to be constructed in the same portion of Arroyo del Puerto. The request is pending NRC action. The inspectors discussed the potential consequences of the flood event on the long-term trend of declining water levels in the Alluvium. The licensee noted that no perturbations of the water levels in the Alluvium were found. Additionally, the inspectors confirmed for the second half of 2021 and the first half of 2022 that all groundwater samples met the ACLs specified in License Condition 34.B. from alluvial compliance wells with sufficient groundwater levels for sampling.

The inspectors reviewed the evolution of exceedances from prior years at wells 32-45 KD-R (molybdenum) and 36-06 KD (beryllium), which are the only wells with exceedances of GPS in 2021 and 2022. The inspectors confirmed that both of these compliance wells remained in the monthly sampling program in the second half of 2021 and the first half of 2022. For compliance well 32-45 KD-R, molybdenum continued to exceed GPS except for one sample in early 2022. For compliance well 36-06 KD, beryllium remained above GPS in the second half of 2021 and the first half of 2022 except for one non-detect sample in 2022. Both of these wells will remain in monthly sampling and quarterly reporting until concentrations are consistently below the GPSs or ACLs are developed.

In summary, the licensee continued to implement its routine groundwater compliance monitoring program in accordance with license requirements.

c. <u>Groundwater Compliance Monitoring- Non-Routine Program</u>

The licensee submitted a supplemental ACL work plan in 2017 (ML17340A826) to support preparation of a license amendment request for supplemental ACLs. As part of the work plan, eight additional monitoring wells were installed by December 2019. Aquifer testing, groundwater chemical analysis, and core mineralogical analysis occurred in 2019 through 2021. The licensee anticipates documentation of borehole construction, testing, and analysis will be included as an appendix or cited report in the future supplemental ACL application. A two-year well-stabilization period of quarterly sampling at the eight additional monitoring wells ended in the fourth quarter of 2021. The licensee incorporated the water level data from the eight wells into contour maps and provided the groundwater reports (ML22041A327 and ML22206A098). The NRC inspectors noted that the new wells have not significantly changed the groundwater contour maps in the three bedrock units. The eight wells are 36-07 KD, 31-03 KD,

30-07 KD, 32-04 TRA, 36-08 TRA, 30-05 TRA, 30-06 TRB, and 5-10 ALL. One of the wells, 36-07 KD, was placed adjacent to well 36-06 KD, which was slated to be part of the anticipated supplemental ACL request because of long-term exceedance of GPS and low pH values. The licensee submitted a license amendment request on June 6, 2022 (ML22174A017) to replace compliance well 36-06 KD with the new well 36-07 KD. At the time of the inspection, NRC action on the request was pending.

The inspectors reviewed the Standard Operating Procedure titled Groundwater Sampling Plan (ESP-007, Revision 49, April 2022). Changes to this version of the procedure include discontinuation of sampling at the former Section 36 shaft and the addition of a reference to ESP-016 Vent Hole Approach for obtaining water level measurements and grab water samples from RAML-linked mines in the region. The inspectors discussed the purging steps when obtaining groundwater samples and how the purge water was handled. The licensee summarized the steps in the procedure and confirmed that the purge water and equipment cleansing water are containerized in 5-gallon buckets at the wellheads and transported to open-type frac tanks. The licensee preferred to avoid dispersing purge water at the wellheads, regardless of the groundwater quality at the well, and possibly creating contamination problems that may later require remediation.

d. <u>Annual Land Use Survey</u>

License Condition 39 requires the licensee conduct an annual survey of land use. This license condition also requires the licensee to submit the results of the annual land use survey to the NRC by the first of July of each year. The licensee submitted the 2021 land use survey to the NRC by letter dated June 21, 2022 (ML22180A192).

The land use within two miles of the mill site included livestock grazing and utility distribution. The report noted that the nearest resident was located approximately three miles north-northeast of the mill site. There were no new land features or structures identified in 2021. In summary, the licensee conducted and submitted a land use land survey for 2021 in accordance with the requirements specified in License Condition 39.

4.3 <u>Conclusions</u>

The licensee implemented the environmental and groundwater monitoring programs and reported the results to the NRC as required by the license. Public doses were small fractions of the regulatory limit. The licensee continued to implement a work plan to collect and analyze information for a future application for a change in selected groundwater ACLs in bedrock units. The licensee conducted a land use survey as required by the license.

5 Exit Meeting Summary

The inspectors presented the inspection results to the licensee's representatives at the conclusion of the inspection on September 21, 2022. During the inspection, the licensee did not identify any information reviewed by the inspectors as proprietary.

SUPPLEMENTAL INSPECTION INFORMATION

PARTIAL LIST OF PERSONS CONTACTED

Licensee

- C. Ardito, Principal Hydrogeologist, INTERA
- K. Applegate, Site Principal
- J. Bauman, Principal Hydrogeologist
- M. Gorospe, Site Specialist
- J. Joyce, H3 Environmental
- B. Kramka, Geological/Geotechnical Engineer, Stantec, Inc.
- A. Persico, Environmental Scientist, INTERA
- E. Ruedig, Senior Health Physicist
- S. Ross, Site Manager
- M. Schierman, Radiation Safety Officer, H3 Environmental

U.S. Department of Energy, Office of Land Management

- M. Kautsky, UMTRCA Program Manager
- J. Tallbull, Site Manager
- J. Graham, Site Lead, RSI
- D. Ravelojaona, Site Lead, RSI

INSPECTION PROCEDURES (IPs) USED

- IP 83822 Radiation Protection
- IP 88005 Management Organization and Controls
- IP 88035 Radioactive Waste Processing, Handling, Storage, and Transportation
- IP 88045 Effluent Control and Environmental Protection

ITEMS OPENED, CLOSED AND DISCUSSED

Opened

None

<u>Closed</u>

None

Discussed

None

LIST OF ACRONYMS USED

- ACL alternate concentration limit
- ADAMS Agencywide Documents Access and Management System
- ALARA As Low As is Reasonably Achievable
- CFR Code of Federal Regulations
- RPEM Radiation Protection and Environmental Monitoring Program Manual
- GPS Groundwater Protection Standards
- IP Inspection Procedure
- NRC U.S. Nuclear Regulatory Commission
- pCi/L picocurie per liter
- RSO radiation safety officer
- RWP radiation work permit