



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

July 13, 2023

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

FROM: Ron Linton, Project Manager *Ron C Linton* Signed by Linton, Ron
Uranium Recovery and Materials on 07/13/23
Decommissioning Branch
Division of Decommissioning, Uranium Recovery,
and Waste Programs
Office of Nuclear Material Safety
and Safeguards

SUBJECT: SUMMARY OF JUNE 15, 2023, PUBLIC OBSERVATION MEETING
WITH HOMESTAKE MINING COMPANY OF CALIFORNIA
REGARDING ITS ALTERNATE CONCENTRATION LIMIT
APPLICATION, DOCKET NO. 04008903, LICENSE NO. SUA-1471

DATE OF MEETING: June 15, 2023

MEETING LOCATION: Virtual Microsoft Teams meeting

PURPOSE: To discuss U.S. Nuclear Regulatory Commission (NRC) staff
comments on the Homestake Mining Company of California (HMC),
Grants Reclamation Project (GRP), Alternate Concentration Limit
(ACL) application.

ATTENDEES: A list of attendees is provided at the end of the meeting summary.

SUMMARY: On June 15, 2023, a virtual public observation meeting was held
between the NRC and the HMC regarding HMC's ACL application
dated August 8, 2022. The ACL application can be found at the
following link (Agencywide Documents Access and Management
System (ADAMS) Accession No. [ML22336A177](#)). The meeting notice
was published on the NRC website on June 2, 2023, and can be
found at the following link (ADAMS Accession No. [ML23153A109](#)). As
an observation meeting, members of the public were welcome to
attend and observe the proceedings and ask questions to the NRC
staff after the NRC business portion of the meeting with HMC.

CONTACT: Ron Linton, NMSS/DUWP
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The virtual public observation meeting began at 12:30 p.m., eastern time, with the NRC staff making opening remarks regarding the meeting background, purpose, and process. The NRC staff and HMC staff and contractors introduced themselves.

After introductions, the HMC staff provided introductory comments on the NRC staff review of the ACL application and decision to not accept the application for detailed technical review. HMC indicated that limited guidance on the ACL application comments were provided by the NRC staff, continued groundwater treatment offers little to no gain, prolonged water treatment results in irreversible water loss, and that HMC wants to quickly resubmit an ACL application.

The NRC and HMC staff discussed in detail the NRC staff letter dated May 17, 2023, that formally notified HMC that the NRC staff was not accepting the ACL application for detailed technical review (ADAMS Accession No. [ML23119A006](#)).

The HMC staff specifically asked about bullets one and three in the May 17 letter. The NRC staff explained that past ACL reviews have taken five to ten years from acceptance to approval. The NRC staff has learned lessons from past reviews that the future long-term care custodian needs to be involved early in the process in the review of the proposed long-term care boundary and institutional controls. The NRC staff discussed that the proposed control boundary and property acquisitions presented in the application lacked specificity and did not describe the efforts and timelines for these acquisitions. The HMC and NRC staff also discussed NRC comments related to information from the ongoing groundwater pumping that indicates that the Groundwater Corrective Action Program continues to remove site contaminants from the groundwater notwithstanding HMC's claims that contaminants have been removed to a level that is as low as is reasonably achievable (ALARA).

The NRC staff and HMC staff discussed the talking points provided to HMC in an email dated June 8, 2023, and made public prior to the meeting on June 9, 2023 (ADAMS Package Accession No. [ML23160A023](#)). The discussion focused on the NRC's talking points related to groundwater modeling assumptions, principles of ALARA, demonstration of institutional controls, and long-term groundwater monitoring of the site.

The HMC staff asked if submission of topical reports, or similar type of reports, outside of the formal ACL process, was possible, such that modeling, for example, and other major issues could be worked out prior to full submission of an ACL. The NRC staff indicated that might be a possibility and would further discuss with NRC management and HMC.

Following the NRC's comments to HMC and ongoing discussions, the NRC staff opened the meeting for questions and comments from the public. The NRC staff received several comments on the ACL application from the public in attendance primarily focused on the regional water supply, the potential threat to the San Andres-Glorieta Aquifer, and the need for long-term monitoring to demonstrate protection of local aquifers. The NRC staff provided closing remarks and adjourned the meeting at approximately 2:30 p.m., eastern time.

In accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public inspections, exemptions, requests for withholding," of the NRC's "Agency Rules of Practice and Procedure," a copy of this memorandum will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's ADAMS. ADAMS is accessible from the NRC website at <https://www.nrc.gov/reading-rm/adams.html>.

LIST OF ATTENDEES:

June 15, 2023, observation meeting with HMC to discuss NRC staff comments on the HMC GRP ACL application. Since this was a virtual meeting, publicly noticed on the NRC website for anyone to attend, the enclosed list may not show, or fully show, all persons in attendance.

Name	Organization	Name	Organization
Ron Linton	NRC	Jennifer Graham	DOE (Contr)
Patricia Jehle	NRC	Trowbridge, Stacy	DOE (Contr)
Marti Poston-Brown	NRC	Amber Rheubottom	NMED
Bill VonTill	NRC	Dana Ravelojaona	DOE (Contr)
Douglas Mandeville	NRC		
George Alexander	NRC	Clemente Sanchez	public
Lifeng Guo	NRC	Chrissy Allen	public
Thomas Lancaster	NRC	Jesse McGunnigle	public
Rob Carpenter	NRC	Bryn Kimball	public
Ian Irvin	NRC	Angela Persico	public
Kevin Bernstein	NRC	Cynthia Ardito	public
Jean Trefethen	NRC	505-290-7510	public
Scott Burnell	NRC	Mara Yarbrough	public
Kevin Hayes	NRC	Cody McCarty	public
Jose Cuadrado	NRC	Kan Tu	public
Linda Gersey	NRC	Mike Schierman	public
Stephen Cohen	HMC	Kathleen Clemons	public
April Lafferty	HMC	Laura Watchempino	public
Toby Wright	HMC	Suzanne Dennis	public
JoAnne Martinez	HMC	Guest	public
Susan Mathiascheck	HMC	Robert Windhorst	public
Elizabeth Rudolf	HMC	Marilyn Maldonado	public
Brad Bingham	HMC	Gabe Wright	public
Daniel Lattin	HMC	L Carver	public
Adam Arguello	HMC	505-290-3180	public
Robert L. Wyckoff	HMC		
Thomas Magette	HMC		
Randy Whicker	HMC		
Colleen Coghill	HMC		
Eric Burch	HMC		

cc: HMC ListServ

Homestake Mining Co. (HMC), Summary of Public Observational Meeting to Discuss NRC Staff Comments on HMC Alternate Concentration Limit Application DATE July 13, 2023

DISTRIBUTION:

- RLinton, NMSS/DUWP/URMDB
- GAlexander, NMSS/DUWP/RTAB
- RVonTill, NMSS/DUWP/URMDB

ADAMS Accession No.: ML23180A128

OFFICE	NMSS/DUWP /URMDB	NMSS/DUWP/RTAB	NMSS/DUWP /URMDB	NMSS/DUWP /URMDB
NAME	RLinton <i>RL</i>	GAlexander <i>GA</i>	RVon <i>RV</i>	RLinton <i>RL</i>
DATE	Jun 29, 2023	Jun 30, 2023	Jul 11, 2023	Jul 13, 2023

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