



June 10, 2024

Mr. Ron Linton
Project Manager / Hydrogeologist
Decommissioning, Uranium Recovery & Waste Programs
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission MS T-5A10,
11545 Rockville Pike
Rockville, MD 20852

Subject: Request for NRC Audit, Homestake Mining Company of California – Grants Reclamation Project – Groundwater Flow and Contaminant Transport Model, Radioactive Materials License SUA-1471, Docket 040-08903

Reference 1: Homestake Mining Company of California – Grants Reclamation Project – Application for Alternate Concentration Limits, Radioactive Materials License SUA-1471, Docket 040-08903 (Aug. 8, 2022) (Accession Package No. ML22263A299)

Reference 2: U.S. Nuclear Regulatory Commission Staff Acceptance Review of the Homestake Mining Company of California Request for Amendment to License SUA-1471 For Alternate Concentration Limits, Docket No. 04008903 (May 17, 2023) (Accession No. ML23119A006)

Reference 3: Homestake Mining Company of California – Grants Reclamation Project – Response to NRC Staff's Acceptance Review of the HMC Request for an Amendment to License SUA-1471 for Alternate Concentration Limits (Feb. 2, 2024) (Accession No. ML24038A265)

Mr. Linton,

On August 8, 2022, the Homestake Mining Company of California (HMC) submitted to the Nuclear Regulatory Commission (NRC) a request to amend Materials License SUA-1471 for Alternate Concentration Limits (ACL) at the Grants Reclamation Project (GRP) (Reference 1). On May 17, 2023, the NRC staff informed HMC of its decision to decline to accept the ACL license amendment request (LAR) for detailed technical review and the reasons for that decision (Reference 2). On February 2, 2024, HMC responded to the NRC staff's letter denying acceptance of the LAR, provided the NRC staff with the requested information, and requested that the NRC resume its review of the ACL LAR (Reference 3).

While HMC believes the February 2, 2024 submittal provided the supplemental information necessary for NRC to accept the LAR for detailed technical review, the NRC staff will inevitably have additional questions due to the complexity of the groundwater flow and transport model. HMC would like to provide the staff answers to its questions as soon as practicable and to continue the progress that has been made at the GRP. In this vein, HMC respectfully requests that the NRC staff conduct an audit of the HMC GRP groundwater flow and contaminant transport model.

As described in the LAR (Reference 1), the groundwater flow and contaminant transport model was used by HMC to predict the fate and transport of constituents in groundwater and predicted exposure point concentrations under the considered correction action alternatives. An NRC staff audit of the model will allow for detailed discussions on how the model operates and the bases for HMC's determination that ACLs are appropriate for the GRP and will remain protective of human health, safety, and the environment at the designated points of exposure.

HMC also proposes to invite and include representatives from the Department of Energy (DOE), the Environmental Protection Agency (EPA), and the New Mexico Environment Department (NMED) in the audit discussions. HMC believes that having participation by NRC, DOE, EPA, and NMED would be beneficial to all parties and would allow for significant progress to be made towards ultimate closure of the site and long-term protection of human health and safety and the environment.

HMC proposes to conduct the audit either the week of July 8th or July 22nd, 2024.

Thank you for your consideration of this request, and we look forward to a constructive audit and continued cooperation and collaboration on all matters related to the GRP. If you have any questions, please contact me via e-mail at bbingham@homestakeminingcoca.com or via phone at 505.290.8019.

Respectfully,



Brad R. Bingham
Closure Manager
Homestake Mining Company
Grants, New Mexico
Office: 505.287.4456 x35 | Cell: 505.290.8019

cc: J. Marshall, NRC, Rockville Pike, Maryland
N. Olin, DOE, Grand Junction, Colorado
S. Appaji, Region VI EPA, Dallas, Texas
C. Dimond, NMED, Santa Fe, New Mexico
M. McCarthy, Barrick, Salt Lake City, Utah
D. Lattin, Barrick, Elko, Nevada