

May 7, 2024

Mr. Jeff Lux
Environmental Properties Management, LLC.
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JLux@burnsmcd.com

Subject: Docket No. 07000925; NRC License No. SNM-928
Cimarron Environmental Response Trust
Response to NRC Concerns Regarding Seepage at Burial Area 1 (February 21, 2024)


Dear Mr. Lux,


Thank you for providing DEQ with the referenced report. DEQ has reviewed the recommendations and data and has the following comments.

- The data in Attachment 1 (Southeastern Area of BA1) and Attachment 2 (Uranium Concentration Table) may not represent the current conditions. Multiple key wells within the southeastern area of BA1 have not been sampled recently, some as far back as 2015. DEQ recommends that baseline conditions be documented before trench operations begin. DEQ is not recommending a change to the sampling program at this time. Nor do we believe that establishing this baseline should delay approval of the overall decommissioning plan. DEQ proposes including the following wells as part of the baseline: TMW-025, 02W-40, 02W-41, 02W-47, and TMW-01. If NRC concurs, please submit a cost estimate and schedule.
- DEQ shares NRCs concern for potential daylighting and seepage into the creek and potential impacts from uranium if the historical concentrations (for example TMW-25) have not decreased as expected. However, planned monitoring during remediation will provide information on concentrations related to the trench operation and will help determine whether adjustments to the system are needed.

Relay any questions to 405-702-5140 or Rachel.Miller@deq.ok.gov.

Sincerely,


J. Paul Davis
Environmental Programs Specialist
Land Protection Division


Rachel Miller
Environmental Programs Specialist
Land Protection Division

cc: Mr. James Smith, NRC, James.Smith@nrc.gov
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