



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

July 8, 2024

Nicole Olin, Site Manager  
U.S. Department of Energy  
Office of Legacy Management  
2597 Legacy Way  
Grand Junction, CO 81503

SUBJECT: HOMESTAKE MINING COMPANY OF CALIFORNIA, GRANTS RECLAMATION PROJECT, REQUEST FOR THE NUCLEAR REGULATORY COMMISSION TO CONDUCT AN AUDIT OF THE GROUNDWATER FLOW AND CONTAMINANT TRANSPORT MODEL AND NUCLEAR REGULATORY COMMISSION STAFF REQUEST FOR DEPARTMENT OF ENERGY TO PARTICIPATE IN THE AUDIT, LICENSE NO. SUA-1471, DOCKET 040-08903

Dear Nicole Olin:

By letter dated June 10, 2024 ([ML24164A317](#)), the Homestake Mining Company of California (HMC) requested that the Nuclear Regulatory Commission (NRC) staff conduct an audit of the HMC Grants Reclamation Project (GRP) groundwater flow and contaminant transport model. Additionally, HMC proposed inviting and including 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.

The NRC staff agrees that a detailed audit of the HMC GRP groundwater flow and contaminant transport model would be beneficial to all parties. The NRC staff acknowledge the importance of groundwater modeling to understand current and future site conditions. Lessons learned from other uranium mill tailing sites has demonstrated the importance of ongoing modeling activities coupled with groundwater monitoring to provide confidence in model projections.

The NRC staff proposes organizing an audit team to pursue the HMC request for the groundwater model audit. The NRC staff requests that if the DOE would like to participate with NRC and other agencies in the groundwater model audit, the DOE identify staff to participate in the audit. The NRC staff would like to begin organizing the audit and reach out to DOE staff identified as possible participants.

The NRC staff is developing a draft groundwater audit plan consistent with NRC's guidance in Licensing Process (LIC) 111 for Regulatory Audits ([ML19226A274](#)).

The NRC staff proposes that the audit begin in the September or October 2024 timeframe. The audit process may involve several virtual or in-person meetings over the course of several months. The start date will depend on staff availability from HMC, NRC and other agencies.

If you have any questions regarding this matter, please contact me at 301-415-7777, or via e-mail at [Ron.Linton@nrc.gov](mailto:Ron.Linton@nrc.gov).

Sincerely,



Signed by Linton, Ron  
on 07/08/24

Ron C. Linton, Project Manager  
Uranium Recovery and Materials  
Decommissioning Branch  
Division of Decommissioning, Uranium Recovery  
and Waste Programs  
Office of Nuclear Material Safety  
and Safeguards

Docket No.: 040-08903

License No.: SUA-1471

Enclosure

cc: Homestake ListServ

B. Bingham (HMC) via ListServ)

J. Fox (NMED) (via ListServ)

S. Appaji (EPA) (via ListServ)

G. Swanson (OSE) (via ListServ)

Homestake Mining Company, Grants Reclamation Project, Request for the NRC to Conduct an Audit of the Groundwater Flow and Contaminant Transport Model and NRC Staff Request For Department of Energy to Participate in the Audit DATE July 8, 2024

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