

NRC – DEQ – EPM Project Status Meeting Notes  
March 25, 2025 – 2:00 Eastern, 1:00 Central

**Attendees:**

NRC

Lifeng Guo  
Jim Smith  
Martha Poston-Brown  
Christine Pineda

DEQ

Paul Davis  
Carol Paden  
David Cates  
Lee Dooley  
Jon Reid  
Courtney Redmond

EPM

Matt Crawford  
John Hesemann

**Administrative Issues**

Proposed Scope of Work and Budget for 2025

Proposed scope of work and budget for 2025 was submitted on January 22, 2025. DEQ has approved the budget, however, NRCs and DOJ have requested additional information regarding EPM utilizing Burns & McDonnell (given Burns & McDonnell is an affiliate of EPM) for both engineering and administrative support services.

Period of Performance Extension – 2024 Budget Approval

NRC's approval of the proposed 2025 Scope & Budget is pending their evaluation of EPM's request to retain Burns & McDonnell, which is going to extend beyond the March 31, 2025 end date of the current approved budget (Proposed Scope of Work and Budget for 2024 – Rev. 1, dated January 30, 2024 [2024 Scope & Budget]). This will leave EPM without an approved budget for the continuation of both Environmental Actions and Administration of the Trust. As allowed by the Trust Agreement, EPM intends to continue ongoing and recurring work approved under the 2024 Scope of Budget to maintain progress toward construction of the remediation system and administration of the Trust.

Jim Smith indicated that Rob Yalen would provide an email presenting an interpretation of Articles 3.2.1 and 3.2.5 of the Trust Agreement, which detail how budgets are managed during the period between the expiration of one budget and approval of a subsequent budget.

***EPM will contact Rob Yalen requesting an email providing guidance on this issue. In the interim, EPM will continue to administer the Trust and execute the ongoing scope of work approved in the 2024 Scope & Budget.***

Approval to Retain Burns & McDonnell

As discussed in the February 2025 meeting, NRC and Rob Yalen requested further information, including a comparison of Burns & McDonnell's labor rates with those charged for similar projects, to support their evaluation of EPM's request for approval to retain Burns & McDonnell for engineering services and administrative support.

***EPM will submit the requested information to NRC, Rob Yalen, and DEQ***

Revised allocation of costs for Federal and State Accounts

Prior to the creation of the CERT, groundwater assessment had only been performed to identify contamination where uranium exceeded the DCGL. Consequently, the State Account was underfunded, in comparison to the Federal Account, when the CERT was established. Based on

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the initial CERT account funding, EPM calculated the percentage of total funding available for remediation and found that the State Account represented 6.8% and the Federal Account and Standby Trust Account (combined) represented 93.2%. Since 2011, remedial costs have been allocated based on those percentages. Due to the limited amount of funding allocated to the State Account, DEQ and NRC agreed that income received by the CERT would be allocated in favor of the State Account (i.e., 10% to Administrative Account, 10% to Federal Account, and 80% to State Account). This distribution of income has increased the size of the State Account relative to the Federal and Standby Trust Accounts. Given that the CERT is entering the construction phase of decommissioning, which will require the largest expenditures from the CERT Accounts, EPM recommends recalculating the allocation percentage for remediation costs to align with the current account values (approximately 82% Federal & Standby Trust and 18% State Account). EPM held a meeting with DEQ on March 14<sup>th</sup> in which DEQ agreed in principle with the proposed changes to the allocations. Jim Smith indicated during this call that he also agreed in principle but would need to review all the details prior to approval.

***EPM will prepare a letter submittal detailing the proposed changes to the remediation cost allocations and requesting DEQ and NRCs approval to make the proposed changes.***

Proposed EPM Operations Staffing Strategy

During operations, the remediation system will require a full-time (Monday through Friday) on-site operator; however, EPM now assesses that this operator will have availability to perform other duties during normal operations. Consequently, EPM believes that it will be more efficient and cost effective for the onsite operator to also serve as the Trust PM. EPM intends to hire a qualified candidate in the coming months to serve as both the onsite operator and Trust PM.. At that time Matt Crawford will transition out of the Trustee PM role and replace John Hesemann as the Trust Administrator.

***NRC and DEQ agreed with the proposed plan. EPM will begin the process of identifying and interviewing candidates with the goal of selecting a candidate within the next several months.***

**Status of Work/Submittals**

Obtaining Bids for Remediation

General Contractor – EPM is working through the process of conditioning O6 Environmental's bid and anticipates completing that process and selecting them as the general contractor in April.

VNSFS Procurements – EPM is still awaiting receipt of VNSFS procurement proposal and anticipates receipt in April.

Injection Skid Procurements – EPM has received bids from all three vendors and is in the process of evaluating the bids. EPM anticipates selecting a vendor in April.

Drilling – EPM has conditionally awarded the drilling scope to Associated Environmental Industries.

***EPM will submit a request for NRC and DEQ to approve the selected vendors along with a construction funding request.***

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Construction Status

EPM anticipates submitting a construction funding request to the agencies in April.

Plan for Community Engagement

John Reid indicated the DEQ discussed community engagement and determined that the development and distribution of a Fact Sheet would be appropriate. Paul Davis asked if a public meeting would be required for the OPDES permit; Carol Paden responded that a public meeting may be required but that determination would be made by DEQ legal counsel based on the level of public interest.

*EPM will evaluate options for developing and distributing a Fact Sheet and discuss the path forward during the April teleconference.*

**Date and Time of Next Teleconference**

Via Microsoft Teams on April 16, 2025, at 2:30 Eastern, 1:30 Central