

NRC Staff Review

DISA Mary Ann Abandoned Uranium Mine Waste

Pre-Mobilization Notification, Revision 1

August 2026

References:

DISA Mary Ann Abandoned Uranium Mine (AUM) waste Pre-Mobilization Notification (PMN), Rev 1, July 1, 2026 ([ML26183A289](#))
 NRC Staff Clarification Questions, July 23, 2026 ([ML26219A003](#))
 DISA responses, July 24-30, 2026 ([ML26219A004](#), [ML26219A005](#), [ML26219A006](#), [ML26219A007](#))
 Energy Laboratories Analytical Data Reports ([ML26219A118](#), [ML26224A403](#))
 DISA License SUA-1605, Amendment 2, July 22, 2026 ([ML26189A005](#))
 DISA Storage Facility License and Trust Agreement, August 21, 2026 ([ML26233A162](#))
 DISA Financial Assurance payment on August 21, 2026 ([ML26235A001](#))
 NRC Jurisdiction Determination Letter, August 21, 2026 ([ML26226A257](#))
 NRC's Environmental Assessment and Finding of No Significant Impact, ([ML26222A129](#))
 Federal Register on August 14, 2026 ([91 FR 52733](#))

License Condition (LC) 19A— PMN Requirements	NRC Staff Comments
LC 19A.1: Estimate of the quantity of gravel needed for the site and for road improvement. Estimate and delineate the area of the site and the length of road that will need grading, graveling, or other improvements.	DISA's Approach: DISA does not use any gravel on access roads. The high-pressure slurry ablation (HPSA) unit area will be bermed, lined with 30-mil polyethylene, and road base will be placed on the lined berm. Upon completion of HPSA operations, the berm, liner, and road base will be removed. DISA states that the road base will be reused by Montrose County, DISA, or the road base provider, assuming that surveys indicate that it is not contaminated. If road base becomes contaminated, it will be safely transported offsite. (ML26219A004). NRC Review: The NRC staff finds this approach acceptable, and DISA has satisfied LC 19A.1.

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LC 19A.2: Schedule for NRC touchpoints a. Mobilization b. Commencement of remediation c. 50% completion of remediation d. Within one week of completion e. Expected demobilization	DISA's Approach: DISA provides an estimated schedule of touchpoints in PMN, Table 1-1, but notes that estimates could change depending on permitting timelines: a. Mobilization: 8/31/26 b. Commencement of remediation: 9/3/26 c. 25% completion: 9/11/26 d. 50% completion: 9/25/26 e. Within one week of completion: 10/12/26 f. Expected Demobilization: 10/26/26 NRC Review: The NRC staff understands that DISA expects the duration of the project to be completed in approximately two months. The NRC staff consider LC 19A.2 satisfied.
LC 19A.3: Dose assessment scenario and the associated threshold that will be used for calculating doses for compliance with the 10 CFR 20.1402 unrestricted release criterion. Also include the analysis used to select the scenario	DISA's Approach: Based on adjacent land use, DISA selected the Recreationalist scenario for the Mary Ann site. Because the Bureau of Land Management (BLM)-defined allotments at the site are used for grazing, DISA also considered a "grazing" scenario. DISA states that the "contribution to dose due to grazing is infinitesimally small and can be discounted" (PMN Section 2.2.1). DISA stated that they will use the recreationalist scenario dose screening criteria from Table 1 of their license (i.e., Ra-226 criteria of 63 pCi/g, U-238 criteria of 8,000 mg/kg, and Th-230 criteria of 295 pCi/g. DISA provided the analyses performed to generate these screening criteria in a supplement to their March 2025 license application (ML25216A267). DISA also provided a dose analysis for a scenario that included grazing as part of the Mary Ann PMN.

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	NRC Review: As discussed in more detail in LC 19A.11, the NRC finds the use of the recreationalist scenario to be appropriate for calculating the dose for compliance with the 10 CFR 20.1402 unrestricted release criterion for the Mary Ann site. The NRC staff reviewed the site conditions at the Mary Ann site to confirm that the site conditions are consistent with or are bounded by the assumptions used to calculate the recreationalist screening values in Table 1 of the DISA license. The NRC staff concluded that the radionuclides present are consistent with those assumed in the license and that the area and thickness of the coarse material that DISA states would remain at the Mary Ann site is bounded by the area and thickness assumed in the development of the Table 1 values. For these reasons, the NRC staff concludes that the use of the recreationalist screening criteria from Table 1 of the DISA license is acceptable for demonstrating compliance with the criteria in 10 CFR 20.1402 for the Mary Ann site. Therefore, the NRC staff consider LC 19A.3 satisfied. As discussed in more detail below (LC 19A.17), the NRC concluded that the potential dose from the grazing scenario is bounded by the recreationalist scenario for the Mary Ann site. LC 19A.3 is satisfied.

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LC 19A.4: The number of samples per 40,000 tons of coarse material post-HPSA remediation will be presented in the pre-mobilization notification along with the ProUCL output. Automatically assume that 5 samples will be collected if the total AUM waste mass is less than 40,000 tons.	DISA's Approach: DISA states they will "collect at least 5 samples of clean coarse material" (PMN Section 2.3). NRC Review: Because the Mary Ann AUM waste pile contains 4,217 tons of AUM waste (PMN Section 3.2.3), the NRC staff assume that 5 samples will be collected. DISA's approach is consistent with the requirements in its NRC license. LC 19A.4 is satisfied.
LC 19A.5: Information specified in Appendix A, "Environmental Information Requirements for Premobilization Notification," of the NRC's generic Environmental Assessment (EA) (ML25265A212). Respond to the applicability of the assumptions included in NRC's generic EA to the project site using the checklist	DISA's Approach: DISA provided the environmental information required by Appendix A in the Mary Ann PMN. NRC Review: NRC's Environmental Assessment and Finding of No Significant Impact can be found at (ML26222A129). It was published in the Federal Register on August 14, 2026 (91 FR 52733). LC 19A.5 is satisfied.
LC 19A.6: Name and geographic coordinates of the site, and origin of the AUM waste. Identify the ownership of the site and the land and provide any information demonstrating that the AUM waste is abandoned.	DISA's Approach: DISA provides the following information (PMN Section 3.1.1): Name of Site: Mary Ann Pile Geographic coordinates: 38.238581, -108.791099 Land Ownership: U.S. Bureau of Land Management (BLM) Mineral Ownership: U.S. BLM Site Claim Holder: NUV2C LLC (undergoing acquisition by Great Northern Energy Metals (GNEM)) DISA assumes that the historic abandoned Mary Ann Mine is the origin of the AUM waste, however they "cannot confirm that this [the Mary Ann Mine] was the sole source of the waste pile due to

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	the number of mines in the general proximity” (PMN, Section 3.1.2). NRC Review: The NRC staff agrees that the Mary Ann AUM pile appears to be abandoned and is not located at an operating facility with an owner responsible for its removal or remediation. DISA has satisfied LC 19A.6.
LC 19A.7: A description of the site to include anticipated land disturbance activities (i.e., constructing temporary roadways, grading of soil for equipment placement, approximate volume of soils/waste rock to be processed, and whether large volumes of soil/waste rock will be moved at the project site to facilitate remediation). Provide estimated surficial boundaries and depth of ground disturbance. Both the radiologically restricted area (that incorporates any crushing operations and crushed rock stockpile) and the licensed area of potential effect (that includes the restricted area and site activities) should be clearly delineated on a site layout.	DISA’s Approach: DISA provides a map indicating the surficial boundaries of the project, indicating the extent of the overall licensed area boundary, and the restricted area boundary. DISA’s map indicates that 0.86 acres of land will be disturbed (PMN, Figure 3-3A). DISA states that grading will occur within the restricted area and the licensed area boundary, to create the HPESA treatment area, crushed mine waste stockpile area, and truck turnaround area (PMN, Section 6.3). DISA states that “no temporary roads will be constructed, and no road grading will occur” (PMN, Section 3.2.2). DISA states that the depth of ground disturbance will not exceed 1 foot into native soils below the Mary Ann AUM waste pile (PMN, Section 3.2.4), or the site as a whole (PMN, Section 7.12). DISA modeled the volume of the Mary Ann AUM waste pile using kriged elevation data obtained during a gamma walkover survey (PMN, Figure 3-4). DISA estimated the volume of the Mary Ann Pile to be processed to be 1,656 m³ or 2,169.4 yd³. During HPESA operations, DISA will move the entire volume of the waste pile to the crushed rock staging area (PMN, Section 3.2.3). NRC Review: The NRC staff finds DISA’s description and depiction of the site work and characteristics to be reasonable. The crushed rock staging area is located inside the restricted area. Should a spill of

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	material occur, it would be within the restricted area. The restricted area will be surveyed prior to release. Therefore, the NRC staff have determined that LC 19A.7 is satisfied.
LC 19A.8: Preliminary data and laboratory reports developed by the applicant for each project site to include concentrations of total uranium and total thorium in the waste rock and the non-impacted surface soils prior to mobilization, waste rock volumes expected to be processed and the anticipated number of HPSA units, and survey data used to establish background radiation levels that will be used in subsequent public dose calculations.	DISA's Approach: DISA states that it will mobilize its C-10 HPSA unit along with all upstream, downstream, and ancillary equipment to the Mary Ann site and placed within the restricted area (PMN, Section 1.2). The C-10 unit is a 10 ton per hour unit, which is the smallest throughput unit that DISA operates. DISA states (PMN, Section 4.1) total uranium and thorium estimates were based on data collected during the flocculant tests, as presented in Table 1-2, except for uranium where the data was obtained during multiple HSPA tests prior to submitting the PMN. The average uranium concentration from the HPSA tests is 235.87 mg/kg uranium. Analytical results from the bulk feed indicate that the radium-226 concentration is 63.8 pCi/g, thorium-230 concentration is 73.1 pCi/g, and thorium-232 concentration is undetected. DISA estimates the thorium-230 concentration of the Mary Ann Pile to be 0.003 mg/kg. Considering previously calculated weight of the Mary Ann Pile (4,217 tons), DISA estimates that the uranium and thorium mass in the Mary Ann Pile to be 1,989 lbs. and 0.03 lbs., respectively. Radiological background was developed by locating a 5m x 5m sample plot in an unimpacted area upgradient and upwind of the site (PMN, Figure 3-3). DISA performed gamma scans and collected a 9-point composite sample.

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	Average background gamma count was 14,516 counts per minute (cpm), which is within the range of background counts that DISA typically observes. This compares to the mean counts on the Mary Ann Pile, which is 93,534 cpm. Background uranium and vanadium concentrations are 8 and 35 mg/kg, respectively. Background radium-226 and thorium-230 are 2.4 pCi/g and 5.9 pCi/g, respectively (PMN, Section 4.1, Table 4-1). DISA modeled the volume of the Mary Ann AUM waste pile using kriged elevation data obtained during a gamma walkover survey (PMN, Figure 3-4). DISA estimated the volume of the Mary Ann Pile to be processed to be 1,656 m³ or 2,169.4 yd³. Appendix E of the submittal contains the laboratory data sheets. DISA submitted additional laboratory reports on August 7, 2026 and August 13 from Energy Laboratories Analytical Data Reports (ML26219A118, ML26224A403). NRC Review: The NRC finds DISA's analytical data and calculations of total uranium and total thorium in the waste rock and the non-impacted surface soils prior to mobilization, waste rock volumes, and background radiation levels to be reasonable. LC 19A.8 is satisfied.
LC 19A.9: Description of flocculant to be used along with supporting Synthetic Precipitation Leaching Procedure (SPLP) information for coarse material (if flocculant is different than FLOPAM referenced in LC 11e).	DISA's Approach: DISA states that it will use FLOPAM AN 934 SH, an anionic polyacrylamide flocculant. DISA will use 150 grams of flocculant per ton of fines concentrates produced during HPSA operations (PMN, Section 1.8.1, 1.8.2, Appendix A).

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	NRC Review: The NRC staff concludes that the use of FLOPAM AN 934 SH is authorized by License Condition 11e. Therefore, LC 19A.9 is satisfied. The NRC staff note that this determination does not exempt DISA from compliance with regulations concerning the use and/or discharge of flocculant chemicals promulgated by other Federal, State, or Local authorities.
LC 19A.10: Plan for final survey to address the entire impacted area (crushing operations and stockpiling area, HPSA process area, transport and waste handling areas, as well as backfilled areas of coarse material).	DISA's Approach: DISA will analyze the clean coarse material for total radionuclides (natural uranium, radium-226, and thorium-230), TCLP for the RCRA metals, and SPLP for the aforementioned radionuclides (PMN, Section 5.1.1). If the upper confidence limits (UCLs) of the analytical results meet the RECREATIONAL screening criteria, the 500 mg/kg exemption limit, and the limits presented below, then the project will be considered in compliance and eligible for unrestricted release. Table 2-1 of the PMN presents the screening criteria for this project which are 63 pCi/g radium-226, 8,000 mg/kg uranium-238, and 295 pCi/g thorium-230. However, taking background into account, the final limits are: • Radium-226: 68.4 pCi/g • Uranium-238: 8,010 mg/kg • Thorium-230: 300 pCi/g DISA will collect samples of the coarse material, as it is generated from the HPSA treatment process and transport the samples to a commercial laboratory, for analysis. Only commercial laboratory results will be used to determine compliance with the numerical criteria. DISA will also perform walkover gamma surveys on 5-m transects at the crushed rock storage area and the restricted area prior to any crushing or equipment mobilization work. DISA will use the ERG RadScout handheld GPS gamma survey system, which includes a touch enabled data logger, sub-meter GPS receiver, a

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	Model 2221 or Model 3000 meter, and a Model 44-10 NaI probe. DISA will collect measurements at approximately 1 foot above the ground. After the HPSA treatment is completed and before reclamation, DISA will perform the same walkover gamma surveys to determine whether contamination from the waste rock treatment process contaminated the ground surface. If the average post-treatment gamma results are within 20% of the pre-treatment gamma results, then DISA will conclude that it did not contaminate the ground surface. Figure 5-1 of the submittal shows the layout of the 5-m transects at the site. Figure 5-2 of the submittal shows kriged gamma walkover survey data produced for the Mary Ann Mine Permit (PMN, Section 5.1.2). NRC Review: The NRC staff approved DISA's proposed survey methods during licensing. The NRC plans to conduct a confirmatory survey at the Mary Ann site to confirm DISA's release survey methods and assure residual radioactivity meets the release criteria. LC 19A.10 is satisfied.
LC 19A.11: Identify and provide justification for the proposed future land use based on existing land use in the vicinity of the site and other site characteristics.	DISA's Approach: DISA states that "future land use will be recreational, mining, and grazing." DISA justifies this by stating that the lands in question are owned by BLM, zoned as "Public Lands," are available to be leased for grazing and mining, and can be used for recreation (Figure 2-4, PMN, Section 4.2). Figure 2-4 also shows that some of the neighboring lands are zoned as general agriculture. In an email dated July 30, 2026 (ML26219A005), DISA stated that from their review of aerial images, numerous site visits, and discussions with claim holders, the current land use of neighboring properties is abandoned mines, permitted mines, roadways to support mining, and unused open land. DISA stated that no agriculture has been observed near the site and that from aerial images, the closest agriculture is in the town of Bedrock,

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	Colorado, 7.5 miles to the northwest. DISA states that the Mary Ann site is located within the Mesa Creek Allotment for cattle grazing (PMN, Section 2.1.6). DISA indicated that it determined that the dose scenario for the Mary Ann AUM waste pile is primarily recreational based on the above information, although DISA also performed a separate evaluation of the potential dose from grazing. NRC Review: The NRC staff agrees with DISA's determination that the site and neighboring land do not have any significant agricultural or ranching activities. Additionally, there do not appear to be any residences in the immediate vicinity of the site. Therefore, the NRC staff concludes that the use of the recreational scenario to model the dose from residual radioactivity at the Mary Ann site appears to be representative of or bounding of potential future land uses of the site. Therefore, the NRC staff finds LC 19A.11 satisfied. The NRC staff's evaluation of DISA's analysis demonstrating that the potential dose from the grazing scenario is bounded by the recreational scenario is described below under LC 19A.17.
LC 19A.12: Approximate mass of source material that the licensee will possess (this can later be refined for inventory and material accountability)	DISA's Approach: Based on testing of five AUM waste samples from the Mary Ann Pile, and estimates of the mass of the pile, DISA estimates that they will possess the following masses of source material at the conclusion of HPSA operations (PMN, Section 4.4): - 1,214 lbs U - 0.02 lbs Th-230 - 43 lbs Th-232

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	NRC Review: The NRC staff have reviewed the approximate mass of source material that DISA expects to possess and concludes that DISA has satisfied LC 19A.12.
LC 19A.13: Specify the recipient for the fines concentrates (i.e., low-level radioactive waste disposal facility, source material storage facility, or uranium recovery facility).	DISA's Approach: DISA states the following (PMN, Section 1.2): <i>DISA will transport all fines concentrates to Energy Fuels' White Mesa Mill in Blanding, Utah, or to DISA's Naturita Storage Facility, Naturita, Colorado. DISA submitted its application to license the Naturita Storage Facility on April 13, 2026 to the Colorado Department of Public Health and Environment (CDPHE). This application is currently under review, and construction of the storage facility is complete. Figure 1-3 includes photographs of the site. DISA will provide a written notification of the final destination prior to mobilizing the crusher or any treatment equipment to the site.</i> DISA transmitted its license for the storage facility, CDPHE License No, CO 1350-01, on August 21, 2026 (ML26233A162). NRC Review: Consistent with LC 11D, DISA cannot mobilize and commence HPSA operations at the Mary Ann AUM waste pile until it has secured an appropriate recipient for the fines concentrates (such as a low-level radioactive waste disposal facility, source material storage facility, or a uranium recovery facility). DISA transmitted its license for the storage facility and stated that the Naturita Storage Facility is the licensed destination for the fines concentrates prior to uranium recovery. Therefore, LC 19A.13 is satisfied.

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LC 19A.14: Methodology used to determine that the project site will meet release criteria including the extent of residual radioactivity remaining at the site from operations and justifications based on land use in the vicinity of the site and other site characteristics for scenarios and parameters used to calculate dose to demonstrate 10 CFR 20 Subpart E release criterion are met.	DISA's Approach: DISA provides numerical criteria that they must achieve to satisfy release criteria (PMN, Section 5.1). Screening levels to achieve dose consistent with the Recreationalist scenario (deemed appropriate by the NRC staff under LC 19A.11) for the coarse fraction, with a site-specific background value included: - Ra-226: 68.4 pCi/g (includes 5.4 pCi/g background) - U-238: 8,010 mg/kg (includes 10 mg/kg background) - Th-230: 300 pCi/g (includes 5 pCi/g background) Coarse material leaching effluent limits established by 10 CFR 20, Appendix B, Table 2, assessed by SPLP: - Ra-226: 60 pCi/L - Th-230: 100 pCi/L - Natural uranium: 0.43 mg/L based on 300 pCi/L limit Hazardous metals (assessed by TCLP) - Arsenic: 5 mg/L - Barium: 100 mg/L - Cadmium: 1 mg/L - Chromium: 5 mg/L - Lead: 5 mg/L - Mercury: 0.2 mg/L - Selenium: 1 mg/L - Silver: 5 mg/L NRC Review: As discussed in LC 19A.3, the NRC finds the use of the recreationalist scenario and its associated screening values to be acceptable to demonstrate 10 CFR 20 Subpart E release criterion are met. Therefore, the NRC concludes that LC 19A.14 is satisfied.

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LC 19A.15: An updated site-specific decommissioning cost estimate, as applicable	DISA's Approach: DISA states the financial assurance for the Mary Ann Uranium Mine Waste Pile Remediation is \$48,931.41 (PMN, Section 6.1), which is consistent with the original licensing cost estimate. NRC Review: DISA is not updating the decommissioning cost estimate for the Mary Ann AUM site. Therefore, LC 19A.15 is satisfied.
LC 19A.16: A certification that financial assurance for decommissioning has been provided in an amount that is at least that of the updated decommissioning cost estimate.	DISA's Approach: DISA intends to fund the financial assurance for the Mary Ann Remediation Project either by cash payment or using a surety bond and standby trust agreement. DISA utilizes Indemnity National Insurance Company for its surety bonds and First Wyoming Bank and Trust for its standby trust agreements (PMN, Section 6.1). NRC Review: DISA provided the NRC staff with the trust agreement (ML26233A162) and proof of payment to a decommissioning trust fund on August 21, 2026 (ML26235A001). Therefore, LC 19A.16 is satisfied.
LC 19A.17: If the project site is an outlier scenario, DISA will incorporate the outlier scenario conditions into a model scenario, calculate screening values, and present the new scenario and associated screening values in PMN	DISA's Approach: DISA evaluated a scenario that involved grazing to evaluate the impact of grazing on the calculated screening concentrations (PMN, Section 2.2.2). In this evaluation, DISA recalculated the recreational screening values assuming that there was some consumption of cattle that grazed on the site (i.e., that 0.01% of the recreationalist's meat consumption would come from cattle that grazed on the site). Other modeling assumptions (e.g., area and thickness of the contaminated layer) were changed from the assumptions made in the generic recreationalist screening value

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	calculations to match the expected final site conditions at the Mary Ann site and the smaller amount of coarse material expected to remain at the Mary Ann site. The concentrations calculated by DISA in this evaluation were higher than the recreationalist screening values approved in the license. Therefore, DISA concluded that it was appropriate to use the recreationalist screening values for the Mary Ann site. NRC Review: NRC staff (1) reviewed the dose assessment DISA performed for the grazing scenario, and (2) performed independent calculations of the screening concentrations and obtained comparable results as DISA. The NRC staff also performed a sensitivity analysis on the fraction of meat consumption that was assumed to come from onsite and found that even if the consumption was increased by two orders of magnitude to 1%, the screening values were not significantly decreased. This sensitivity analysis was based on the expected site conditions (e.g., radionuclides and geometry) of the Mary Ann site and the results might not be generally applicable to sites with other parameters. Therefore, the NRC staff concludes that for the site-specific conditions at the Mary Ann site, the recreationalist screening values bound the values calculated by a site-specific analysis. It is, therefore, acceptable to use the recreationalist screening values at the Mary Ann site even though that site has a grazing pathway that was not considered in the recreationalist scenario. This conclusion might not be true of other sites and needs to be evaluated on a site-by-site basis. For the reasons described above, the NRC staff considers LC 19A.17 to be satisfied.

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LC 19A.18: A description of the expected post-HPSA stabilization methods, including scaled map showing area and depth of coarse material disposition.	DISA's Approach: Post-HPSA land stabilization and reclamation must meet the conditions in DISA's Plan of Operations as approved by the BLM (Decision Record available at https://eplanning.blm.gov/Documents/?id=d5adb72e-2543-f111-88b4-001dd8084607&spid=19cf9b0a-3f43-f111-88b4-001dd8084607#). DISA provides plans to use a 1-foot layer of coarse fraction and native topsoil to reclaim and stabilize the 0.86 acres of disturbed surface areas at the Mary Ann Pile site upon completion of HPSA operations. The reclaimed areas will be graded to match initial site conditions (7%). DISA will incorporate into the top layer of the coarse fraction existing topsoil from below the crushed rock stockpile, the restricted area, and the Mary Ann AUM waste pile (PMN, Section 6.3, Figure 6-1). DISA describes plans to seed the reclaimed area with a seed mix as approved by the Colorado Department of Reclamation, Mining, and Safety (DRMS) and the BLM. DISA will use treated process water, subject to discharge criteria established by NRC and other applicable Federal, State, and Local authorities, to irrigate the planted seed mix. (PMN, Section 6.3, Table 6-1). DISA states that they will not use topsoil found below the Mary Ann AUM waste pile if the radionuclide concentrations of the topsoil exceeds 50% of the screening levels selected for the site. NRC Review: The NRC staff have reviewed DISA's plans to stabilize the site following the conclusion of HPSA operations. The NRC staff find DISA's description and depiction of stabilization methods to be adequate and find that LC 19A.18 is satisfied. The staff recognizes that DISA must also meet requirements of the DRMS and BLM.