

# Statement of Basis

## RADIOACTIVE MATERIAL LICENSE (RML) NO. UT 1900479 GROUND WATER QUALITY DISCHARGE PERMIT (Permit) NO. UGW370004

### SUMMARY OF CHANGES

January, 2018

The following is a list of additional changes being made to the RML and Permit after close of the Public Comment Period for the RML and Permit renewals that occurred in 2017.

#### License Changes Summary

<b>License Condition <sup>(1)</sup></b>	<b>Change Type <sup>(2)</sup></b>	<b>Description of Changes</b>
4	Minor	Reset expiration date to be 10 years from license execution.
9.4	Minor	In paragraph B(3) removed the reference to the NRC 1997 Environmental Assessment and replaced it with “most recent Environmental Assessment conducted by the Division from the last license renewal and/or major license amendment.” In paragraph D added the word “current”
9.13	Minor	Add a new license condition requiring reclamation activities to follow the most current version of the Mill’s reclamation plan
12.2	Minor	Revised the submittal date for the Annual Technical Evaluation Report.

#### Explanation of Changes:

##### License Condition 4

The date will be changed to ten years after the final RML is signed by the Director of the Utah Division of Waste Management and Radiation Control.

##### License Condition 9.4

Based on comments received Paragraph B(3) was changed from referencing the 1997 NRC Environmental Assessment to referencing the most recent Environmental Assessment that was conducted by the Division during the last renewal and/or major license amendment. Since the White Mesa Uranium Mill processing and operations have not significantly changed since the State of Utah began regulating the Mill in 2004, it was determined that it was inappropriate to specify a specific Environmental Assessment.

Also, based on comments received the word “current” was added to Paragraph D.

##### License Condition 9.13

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- 1 License conditions not listed in the table are those that remain unchanged from the last License amendment.
  - 2 The Director deems minor changes as those that are insignificant in nature, or result in more protection of human health, safety, and/or the environment. Major changes are those found otherwise, and are only made after exposure of the License to public comment and resolution thereof.

The Division added a new License Condition that requires the Mill to follow the currently approved version of the Mill's Reclamation Plan.

### **License Condition 12.2**

During the Public Comment period the Licensee requested the submittal date for the Annual Technical Evaluation Report to be changed from November 15 of each year to December 1 of each year. This will allow the Licensee two extra weeks to evaluate the data collected for the report and to write the report.

## **SUMMARY OF NEW MINOR PERMIT CHANGES**

### **Installation of New Monitoring Wells Part I.H.2**

Based on comments received during the public comment period for the Permit, the Permittee has agreed to address a concern from the Ute Mountain Ute Tribe and voluntarily install three monitoring wells in the area in the southeast portion of the Mill Site. The installation of these monitoring wells has been included in Part I.H.2 of the Permit. The requirement includes that the three new monitoring wells, designated MW-38, MW-39, and MW-40, will be located in the area between current monitoring wells MW-17 and MW-22 according to specific locations included in Figure 1 attached to this January 2018 Statement of Basis for the License/Permit Public Participation Summary. The monitoring wells are to be installed 90 calendar days of the issuance of the Permit. The monitoring wells will be drilled and constructed according to Permit requirements and will be completed and an As-built Report is required to be submitted to the Director on or before August 31, 2018.

### **Background Groundwater Quality Report for New Monitoring Wells Part I.H.3**

Part I.H.3 the Permit was added to require that after eight consecutive quarters of groundwater sampling and analysis of new wells MW-38, MW-39, and MW-40 the Permittee will submit for Director approval a Background Groundwater Quality Report.

**Figure 1**

**Proposed Wells MW-38, MW-39, MW-40 Location Map**