APPLICATION FOR ALTERNATE CONCENTRATION LIMITS FOR THE SMITH RANCH-HIGHLAND MINE UNIT-B IN-SITU LEACH URANIUM MINE

A Presentation To: The U.S. Nuclear Regulatory Commission

Presented By: Daniel W. Erskine, PhD

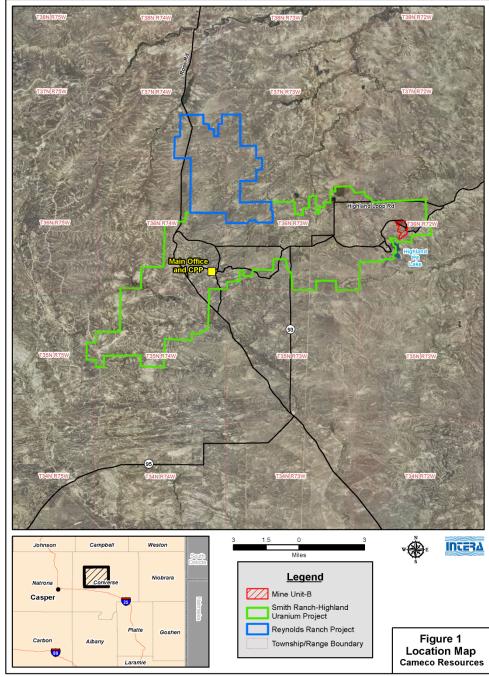


Date: September 5, 2012

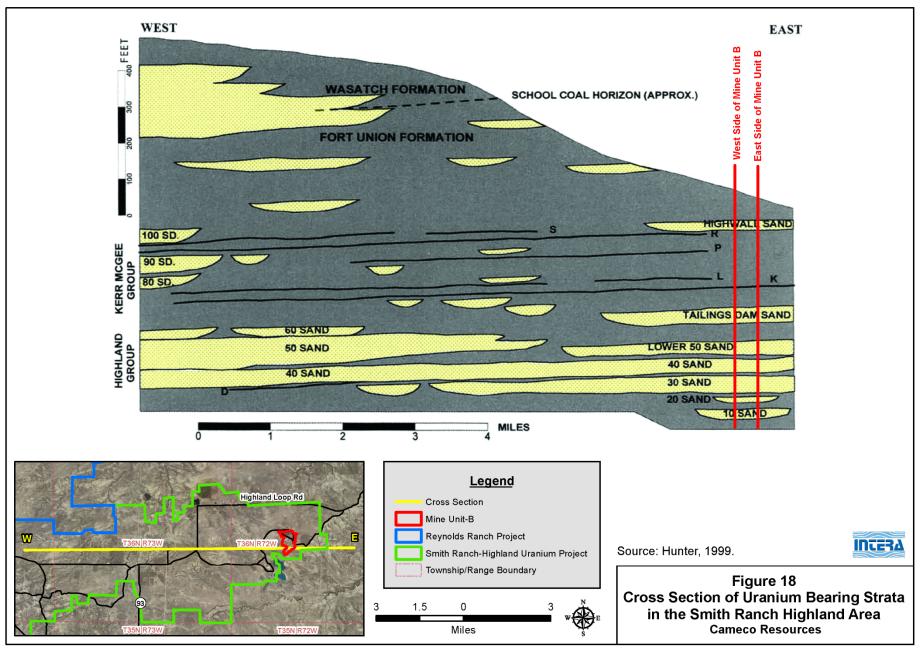
Presentation Outline

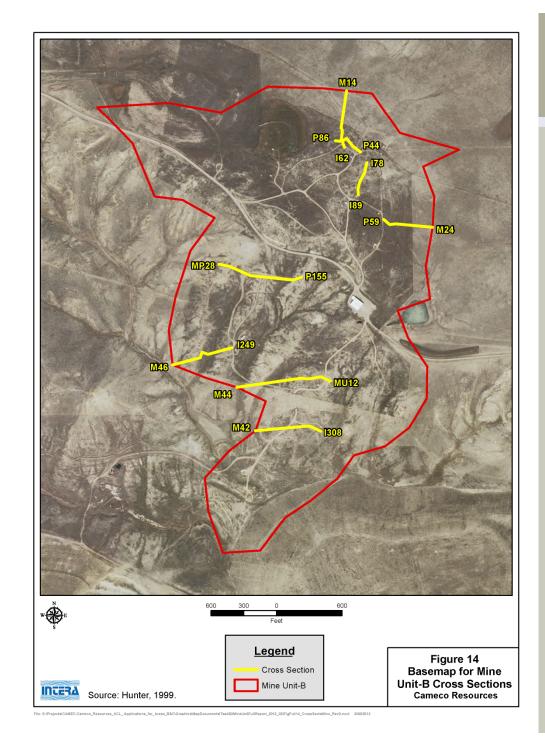
- ♦ Physical Setting and Facility Background
- ◆ Geology/Hydrogeology
- **♦ Source and Contaminant Characterization**
- **♦ Transport Assessment**
- ◆ Pathway Assessment
- **♦ Corrective Action Assessment/ALARA**Demonstration



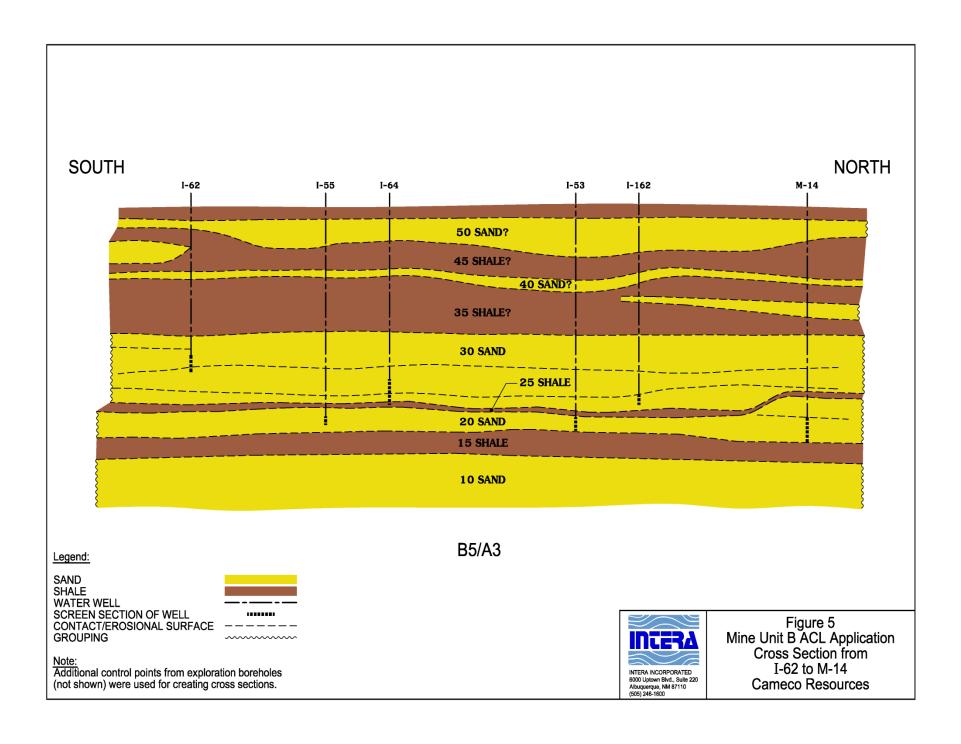


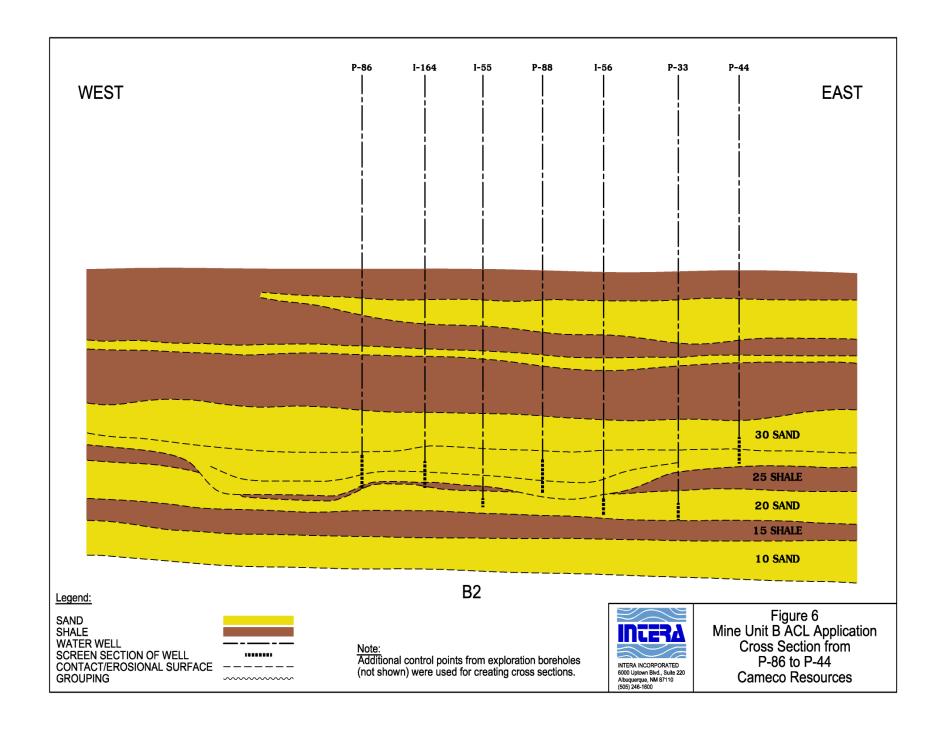


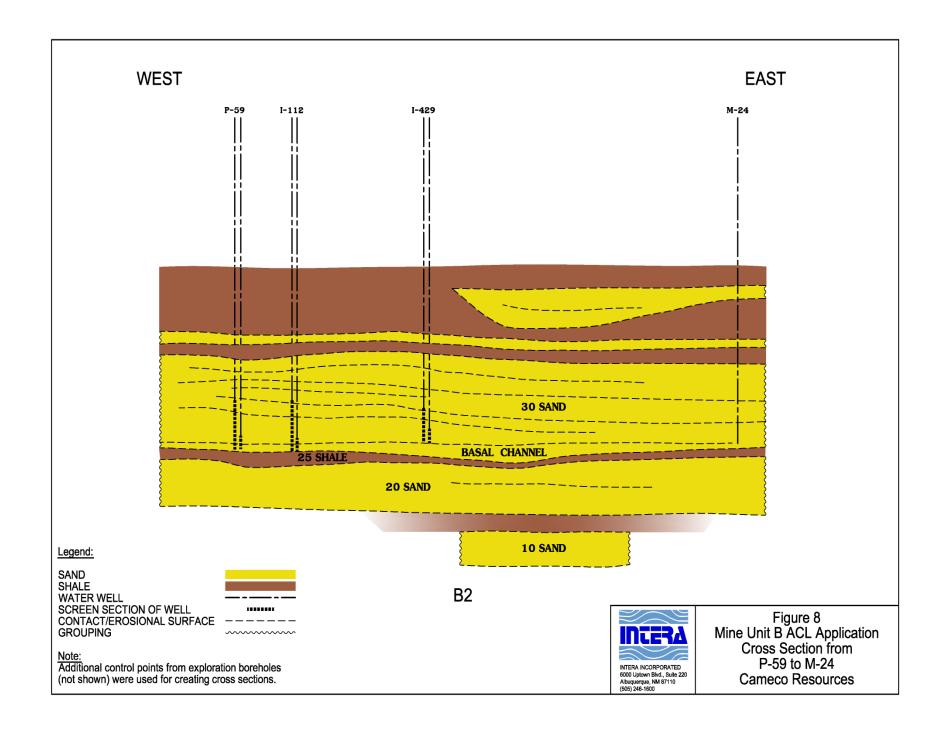


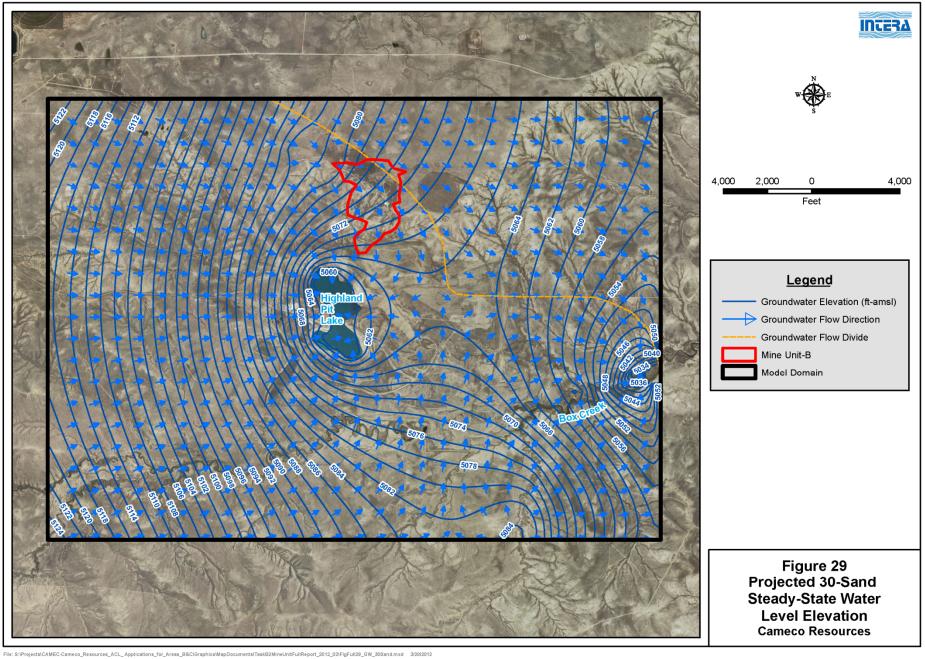


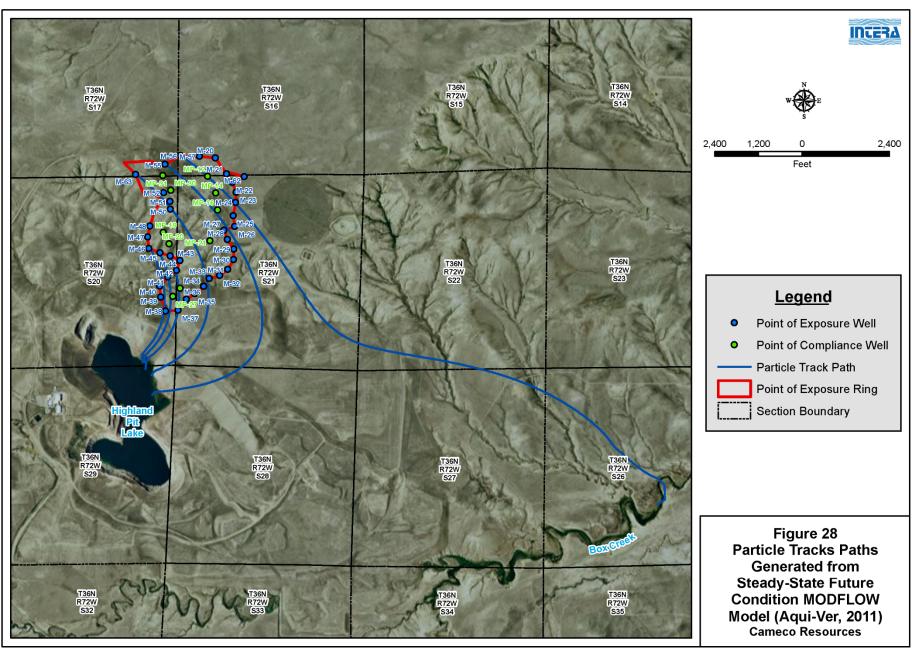


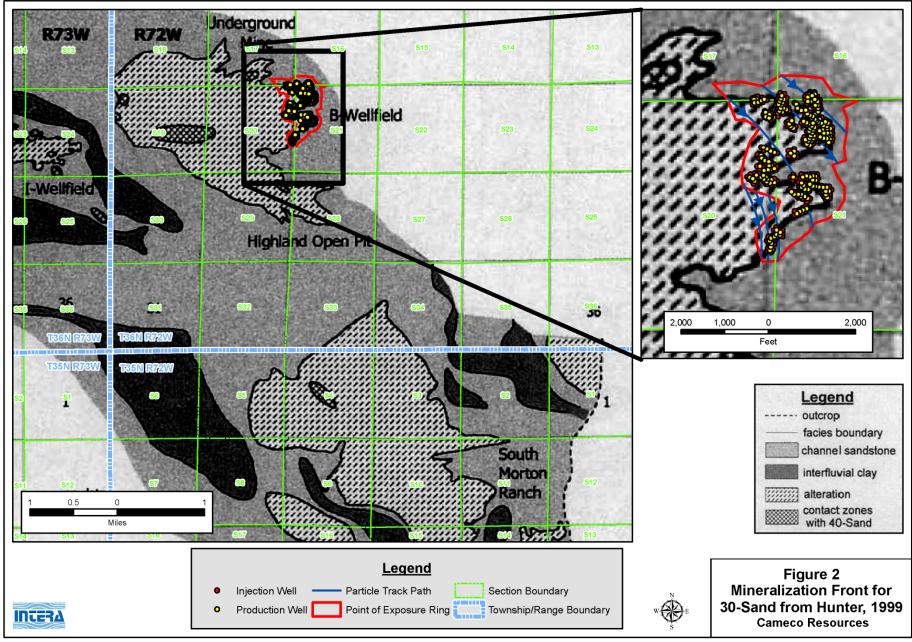


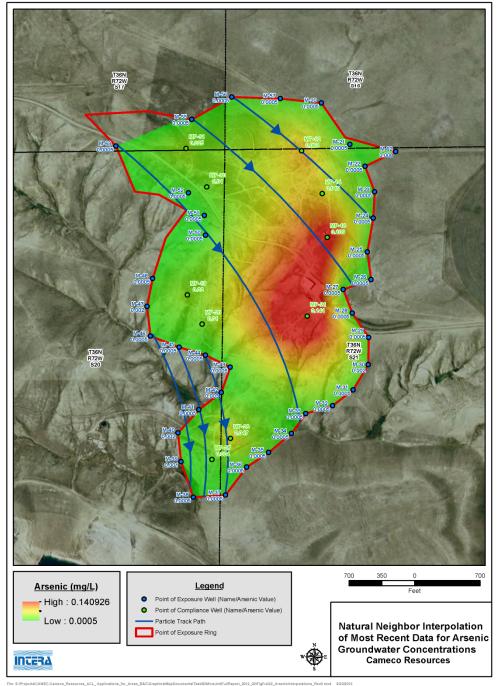




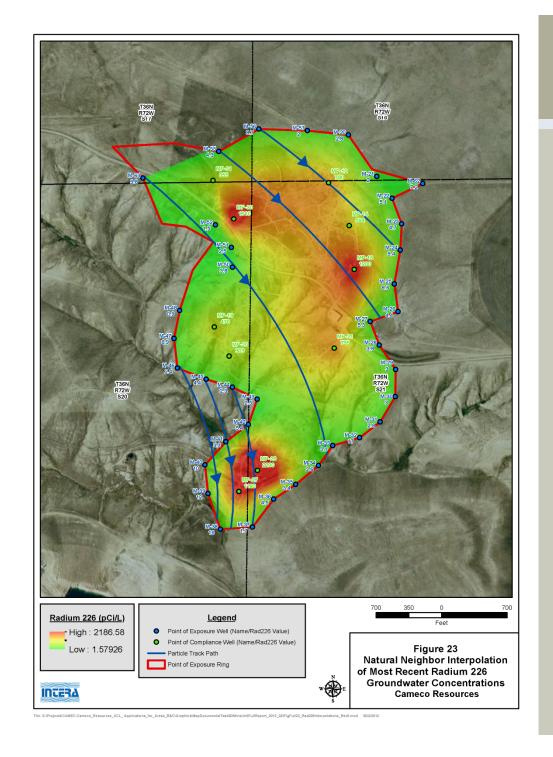




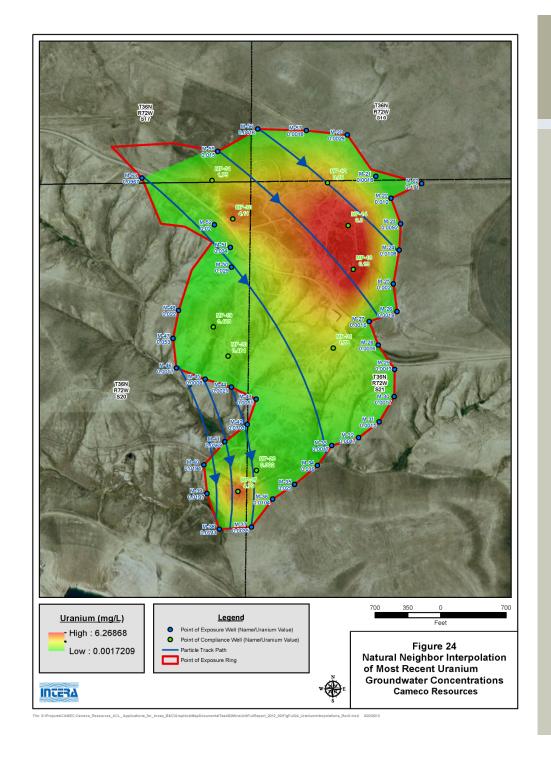




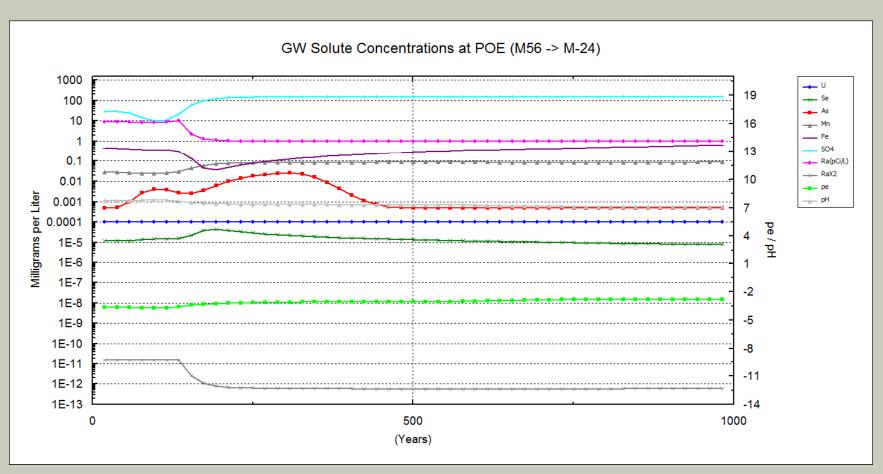




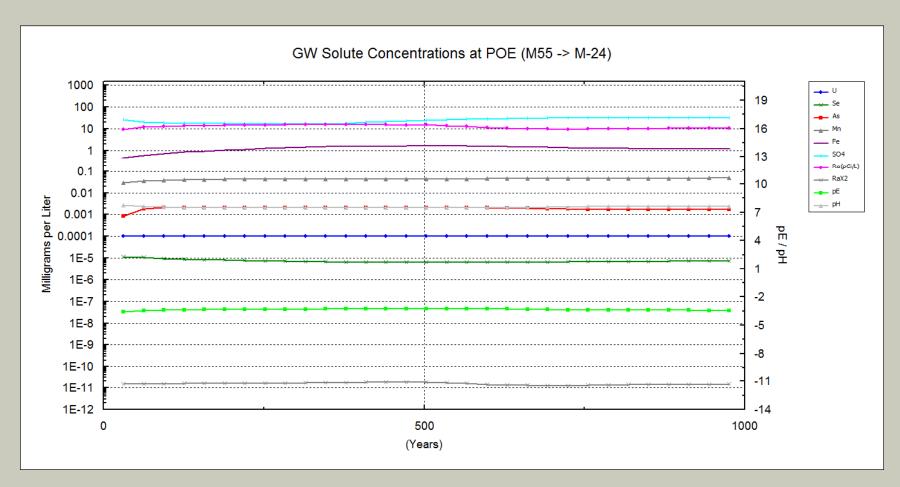




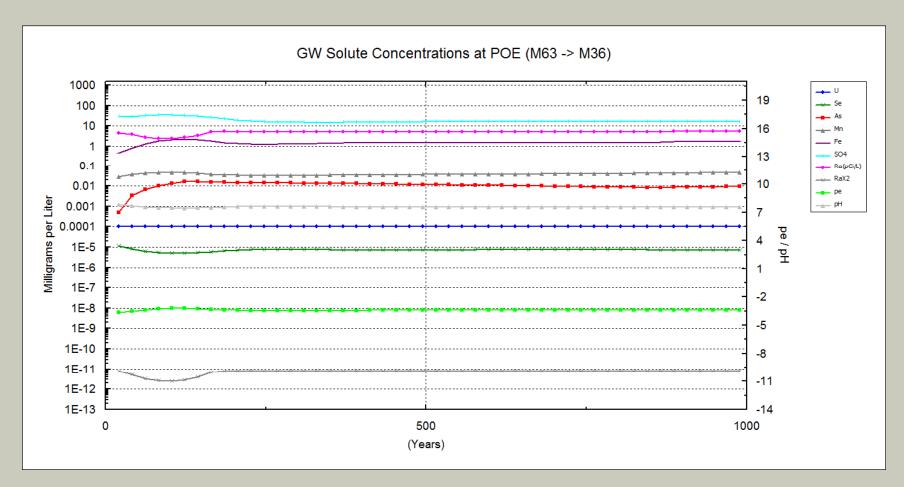




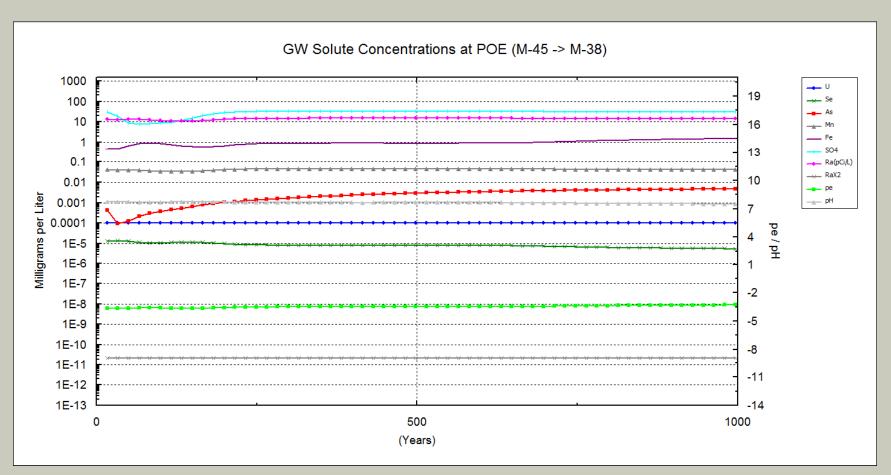




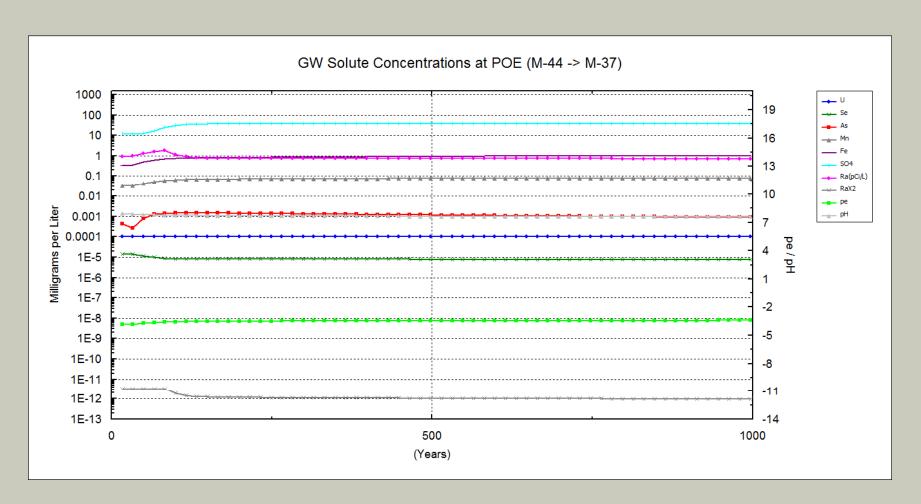














Regulatory Standards for Constituents of Concern

Constituent	Health Risk- Based Concentration	WDEQ Domestic Water Supply	Appendix A to Part 40 CFR (MCVs)	EPA MCLs	
Arsenic	0.05 mg/L	0.05 mg/L	0.05 mg/L	0.01 mg/L	
Radium 226+228	44 pCi/L*	5 pCi/L	5 pCi/L	5 pCi/L	
Uranium	0.24 mg/L	NA	NA	0.03 mg/L	



Comparison of Health Risk-Based Concentrations to Modeled Values at the Proposed POE Wells

			Maximum Predicted POE Concentrations			Health Bases Risk Assessment Values		
Upgradient Well	POC Well	POE Well	Uranium (mg/L)	Arsenic (mg/L)	Radium (pCi/L)	Uranium (mg/L)	Arsenic (mg/L)	Radium (pCi/L)
M-56	MP-12	M-24	0.00001	0.00157	9.57		0.05	44
M-55	MP-16	M-24	0.00001	0.00211	9.89			
M-63	MP-21	M-36	0.00001	0.016	5.43	0.24		
M-45	MP-27	M-38	0.00001	0.00476	15.12			
M-44	MP-26	M-37	0.00001	0.00145	1.78			



Cost Benefit Analysis of Continuation of the CAP

Parameter	Units	Baseline (Oct/Nov 1987)*	End Mining (July 1991)*	End of Restoration (2004)*	Difference after 13 Years of Restoration	Cost (Present Value 2012 \$)	50% Reduction in Concentration	Estimated Cost for 50% Reduction in Concentration
Ra-226	pCi/l	316	1478	437	1041		218.5	
As	mg/l	<.001	0.008	0.058	-0.05	\$4.4 Million	0.029	\$10 Million
U nat	mg/l	0.062	22.3	1.79	20.51		0.895	



ALARA

- ◆ Cost of one person rem averted \$18,600
- **♦** Far exceeds the NRC's ALARA guidance of \$2,000 per person-rem
- ♦ Very near to the \$20,000 per person-rem for demonstration of "Prohibitively expensive" criteria

