

**WASTE CONTROL
SPECIALISTS LLC**

May 4, 2012

VIA FedEx

Ms. Lorraine C. Council, P.G., Manager
Radioactive Materials Division
Texas Commission on Environmental Quality
P.O. Box 13087, MC-233
Austin, Texas 78711-3087

Reference: (1) Radioactive Material License No. R04100, Amendment No. 14
CN 600616890, RN 101702439

**Subject: Final Monthly Water Level Measurements for Six New Upper Dockum Wells
in Support of LC 70.D in RML No. R04100, Waste Control Specialists LLC,
Andrews County, Texas**

Dear Ms. Council:

During construction and excavation of the disposal site, License Condition (LC) 70.D of Radioactive Material License (RML) No. R04100 (Reference 1) requires Waste Control Specialists LLC (WCS) to conduct water level elevation measurements on a frequency consistent with LC 72 in six (6) new wells to augment the resistivity studies required by LC 53.E. These wells are installed stratigraphically below the Ogallala/Antlers/Gatuña (OAG) unit in a non-transmissive portion of the upper Dockum Group and are designated as CWF-7UD, CWF-12UD, FWF-10UD, FWF-14UD, FWF-17UD and IF-UD. Water level measurements for April, 2012 are provided in Table 1 (enclosed). All six of the upper Dockum wells were dry during the April, 2012 measurement event and the results are consistent with previous monthly water level measurements in an unsaturated portion of the upper Dockum Group. The monthly reports have demonstrated that there is no vertical communication from the OAG to a potentially higher hydraulic conductivity area within the upper Dockum Group at the six (6) well locations selected by the TCEQ and its consultant.

Construction and excavation of the low-level radioactive waste disposal facility is complete, all required certification reports have been submitted, and LC 70.D has been satisfied. With the submittal of this report, WCS will discontinue gauging and reporting on CWF-7UD, CWF-12UD, FWF-10UD, FWF-14UD, FWF-17UD and IF-UD as an obligation of LC 70.D.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or

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persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

WCS requests that a copy of all correspondence regarding this matter be directly emailed (skirk@valhi.net) to my attention as soon as possible after issuance. If you have any questions or need additional information, please call me at 432-525-8500.

Sincerely,

A handwritten signature in blue ink that reads "Scott Kirk". The signature is written in a cursive style with a large, stylized "S" and "K".

J. Scott Kirk, CHP

Vice President, Licensing, Corporate Compliance and Radiation Safety Officer

Enclosure

cc: Charles Maguire, TCEQ
William P. Dornsife, P.E., WCS
Jim Van Vliet, WCS
Linda J. Beach, WCS
Jane Grimm, WCS
Pam Giblin, Baker Botts
WCS Regulatory Compliance
WCS Records Management

ENCLOSURE

Table 1: Upper Dockum Well Water Levels - April 2012

Monitoring Well/ Piezometer Name	Northing (ft) ¹	Easting (ft) ¹	Ground Elevation (ft msl)	Top of Casing (ft msl)	Total Well Depth (ft btoc)*	Bottom of Screen Slots (ft msl)	Date of Gauging Event	Depth to Water (ft)	Water Elevation (ft msl)	Saturated Thickness (ft)	Data Source	Comments
CWF-7UD	6873126.9478	564887.2855	3465.3767	3468.5659	72.73	3396.46	04/04/12	Dry	na	na	field form	Dry
CWF-12UD	6873961.7998	564296.4618	3473.8394	3478.9655	77.03	3402.50	04/04/12	Dry	na	na	field form	Dry
FWF-10UD	6873855.2620	563311.1291	3469.0689	3474.2114	71.28	3403.66	04/04/12	Dry	na	na	field form	Dry
FWF-14UD	6873606.8872	563850.2248	3469.4031	3473.4436	76.26	3397.86	04/04/12	Dry	na	na	field form	Dry
FWF-17UD	6874351.4530	564300.2778	3477.3747	3476.9968	84.12	3393.36	04/02/12	Dry	na	na	field form	Dry
IF-UD	6874413.3145	563574.4724	3477.2166	3480.4250	81.17	3399.88	04/04/12	Dry	na	na	field form	Dry

na: not applicable

*total well depth measured in the field

Note ¹: Coordinates are in Texas State Plane, Texas North Central Zone, NAD 83, US survey feet