



DRC-2024-004023

December 29, 2023

CD-2023-264

Mr. Doug Hansen, Director Division of Waste Management and Radiation Control P.O. Box 144880 Salt Lake City, UT 84114-4880

Subject: Federal Cell Facility Application: Responses to the Director's Request for Information – DRC-2023-078530

Dear Mr. Hansen:

EnergySolutions hereby responds to the Utah Division of Waste Management and Radiation Control's December 21, 2023 Request for Information (RFI) on our Federal Cell Facility Application. A response is provided for each request using the Director's assigned reference number. Because each comment is applied to multiple Engineering Drawings, we have included Tables 1 through 3 to present summaries of the individual requests that are reflected on each Engineering Drawing appended to this response. All Engineering Drawings we received are attached to this response, inclusive of drawings 60801-G03, 14004-L01, 1-1, and Subdivision Plat Map, which did not require any changes according to the director's RFI.

#### **Appendix B: Federal | Cell Facility Engineering Drawings**

B-3: The drawing exhibits the 11e.(2) embankment design layout as one monolithic embankment. Please revise sheet to accurately depict the proposed embankment layout.

The 11e.(2) embankment and proposed Federal Cell Facility layouts have been adjusted in Engineering Drawings 0801-G04, 07007-J01, 07007-J02, and 07007-J03 to reflect the smaller footprint authorized by the 2022 amendment 3 to Radioactive Material License UT2300478.

B-4: There is a lack of detail with the existing instrumentation in both the text and in the plans. Model, functionality, installation date, location (coordinates), minimum instrumentation parameters, etc. should be abundantly clear to the reader. A summary of instrumentation should be provided within the text or the plans for clarity. Please provide a summary that elaborates on these instruments' specifics, including notes on relative drawings.

Air quality sampling for airborne particles is accomplished using a continuous low flow pump with a flow rate of 60 liters per minute through a glass fiber filter that can demonstrate a minimum of a 95% dispersed oil particulate (DOP) collection efficiency for 0.3  $\mu$ m particles. Specifications of the current pumps in service include:

- Air Mover: Oilless, Rotary Vane, Vacuum Pump with 1/4, or 3/4 HP, 115 or 230 VAC
- Control Valve: Mechanical, Heavy Duty, Differential Type Automatic Flow Controller.

Operation and calibration of the air quality sampling pump is addressed in EnergySolutions procedures CL-EV-PR-013, Airborne Particulate (LoVol) and VTD Tritium Monitoring

<sup>&</sup>lt;sup>1</sup> Hansen, D.J. "Federal Cell Facility Application Request for Information." via DRC-2023-004939 from the Utah Division of Waste Management and Radiation Control to Vern Rogers of Energy Solutions, June 13, 2023.



(attached) and CL-IN-PR-422, *Air Sample Pump Maintenance and Calibration* (attached). Table B-4-1 summarizes the pump models used and the dates that the pumps were placed in service for each station. Information in this table is continuously revised throughout the year to reflect pump maintenance exchanges, calibrations, and replacements. The dynamic nature of this table makes it impractical to include in the Environmental Monitoring Plan. The geographic locations of the sampling stations listed in the Environmental Monitoring Plan are repeated in Table B-4-2.

Table B-4-1: LoVol Pumps In Use to Sample Atmospheric Particulates

Station	Current Equipment Inservice Date	Current Pump Model
A-10	8/25/2023	HI-Q VS23 Series
A-11	6/6/2023	HI-Q VS23 Series
A-13	4/18/2023	HI-Q VS23 Series
A-16	9/1/2023	HI-Q VS23 Series
A-17	8/4/2023	HI-Q VS23 Series
A-18	8/11/2023	HI-Q VS23 Series
A-19	8/4/2023	HI-Q VS23 Series
A-22	9/21/2023	HI-Q VS23 Series
A-28	8/18/2023	HI-Q VS23 Series
A-29	6/2/2023	HI-Q VS23 Series
A-30	6/6/2023	HI-Q VS23 Series
A-35	9/15/2023	HI-Q VS23 Series
A-36	9/8/2023	HI-Q VS23 Series



**Table B-4-2: Geographic Air Sample Station Locations** 

NOTE: Point of Beginning is the Clive monument at the Southwest corner of Section 32

Station	North	East	Station	North	East	Station	North	East
A-1*	5163	2749	S-3*	4891	3463	S-38*	40	600
A-4*	-88	5252	S-4*	4883	3812	S-39	1050	200
A-5*	-14	2647	S-5*	4877	4204	S-40	1600	200
A-10	-10	4124	S-8*	3599	4209	S-50*	4440	4175
A-11	28	1196	S-12*	1992	4155	S-51*	4023	4168
A-13	499	198	S-13*	2002	3679	S-52*	3118	4149
A-16	2412	-6633	S-15*	2011	3111	S-53*	2659	4140
A-17	2167	5323	S-17*	5195	3399	S-54*	2367	4137
A-18	5417	4853	S-18*	5035	4015	S-56	2551	85
A-19	3965	5383	S-19	5213	5162	S-57	2963	91
A-20*	5084	5409	S-21*	4537	5359	S-58*	3339	99
A-21*	2162	71	S-22	3967	5356	S-59	3735	106
A-22	2962	88	S-23*	3347	5344	S-64	4038	272
A-26*	-129	3282	S-24	2764	5335	S-65	4430	286
A-27	-2701	3406	S-25*	2169	5322	S-66	4801	335
A-28	4043	104	S-26	1596	5375	S-71	5291	796
A-29	4636	115	S-27	379	5355	S-72	5282	1222
A-30	5287	319	S-28	-70	4754	S-73	5273	1658
A-33*	5501	2762	S-29	-229	3389	S-74	5256	2429
A-35	5280	1495	S-32*	2047	2690	S-75*	4471	2724
A-36	5256	2402	S-33*	3238	2694	S-76*	2784	2703
A-37*	658	5377	S-34*	3764	2717	S-77	5174	2678
A-38			S-81			S-83		
A-39			S-82			S-84		
B-2	2650	13200	S-36	-5	2200	S-78*	2162	76
S-1*	4892	2745	S-37	10	1600	S-79	-2709	3438
S-2*	4896	3126	F-37	9377	4541	F-38	6702	4355
F-39	6594	3198	F-40	6605	1437	F-41	6282	399



B-5: A groundwater monitoring well to the Southeast corner (above GW-136) is not labeled correctly. Please revise to reflect correct labeling.

The groundwater well label has been corrected on Engineering Drawing 07007-J02.

B-6: Green highlighting is noticeable on this sheet. If this coloring has significance, provide notes elaborating. Otherwise, please revise the sheet to remove green highlighting.

The licensed embankment outlines are placed correctly on Engineering Drawing 07007-J03. Similarly, the divisions of the scale marker are sized correctly. The Clive Site Engineer elected to apply green highlight to the scale marker and embankment licensed outlines as a location aid to the reader. The U.S. Nuclear Regulatory Commission (NRC) is silent in 10 CFR 61, NRC's NUREG-1999 and NUREG-1200 on a prohibition of the use of a colored scale marker our license outlines to assist readers. Additionally, no such prohibition has been promulgated in Utah Administrative Code R313-25. Even so, the green highlighted boundary, scale, and embankment outlines have been adjusted to black on Engineering Drawing 07007-J03 in response to the director's preference.

B-7: Section lines are not blue as shown in Legend. Please revise sheet to be consistent with Legend.

The legend to 07007-J03 has been adjusted to represent the section line depiction.

- B-8: These lines are not depicted in Legend nor Notes. Please revise sheet to elaborate on the significance of these lines.
  - a. This line specifically appears to be different than the others (assuming this line is the same as the others).

The use of lines on Engineering Drawing 07007-J03 has been unified and included in the Legend.

B-9: Please revise sheet to indicate the correct orientation of the North arrow.

The depiction of north has been corrected on Engineering Drawing 07007-J03.

B-10: GW-38R, GW-37, GW-36 are not shown on the plan. Please ensure groundwater monitoring wells are displayed or provide a justification on this sheet indicating reasoning for excluding these wells from the plan.

The installation and monitoring of GW-36, GW-37, and GW-38R is governed by Groundwater Quality Discharge Permit UGW450005. Their location is described and displayed in the Engineering Drawings associated with that Permit. As is reflected in its title, the purpose of Engineering Drawing 14004-C01 to display the physical and geographic features of the Federal Cell Facility. Monitoring wells GW-36, GW-37, and GW-38R have been added to Engineering Drawing 14004-C01 in response to the director's preference.

B-11: Please provide details on the structure "OUTFALL DISPERSION DITCH" noted in the southwestern corner of the Federal Cell. Include the function and the minimum dimensions.

The function and dimensions details for the Outfall Dispersion Ditch are under development as part of a separate licensing action (than the proposed Federal Cell Facility) being considered by



the director. Additional function and dimensional details will be available as a function of that effort.

B-12: Crest length of 685.1' and approx. slope depicted in cross section B of sheet 14004-C02 is not delineated on this plan.

The crest length and slope notations have been added to Engineering Drawing 14004-C02.

B-13: Please elaborate with background information on "Clive Monument" or provide text language that gives clarity. It is unclear as to the datum used to establish this monument as a control point.

The Clive Monument was established as a positioning central point to support a separate radioactive material license granted prior in 1994 and is not being adjusted to support the proposed Federal Cell Facility. However, the legacy datum used to establish the Clive Monument as the positioning original control point has been summarized on Engineering Drawing 14004-C01 in response to the director's preference.

B-14: Does the calculated volume include the cover system and/or the clay liner? This conflicts with the language in Note (1) of this sheet in that information displayed is related to "CLEAN FILL." Expand to explain and/or breakdown this parameter.

Clean Fill is defined in the Federal Cell Facility Construction Quality Assurance/Quality Control Manual. The description of calculated volumes has been clarified and expanded on Engineering Drawing 14004-C01 in response to the director's preference.

B-15: It does not appear that the section line delineates the western side of the cell. Please revise the sheet to indicate the accurate section line and review all plans to ensure Property Lines and Section Lines are consistent with Sheet 18008-U04.

The western property and section lines have been noted on Engineering Drawings 14007-C01 and 14004-L01.

B-16: Please revise to indicate "11e.(2) CELL" (missing period after 'e').

The 11e.(2) embankment is already authorized under Radioactive Material License UT2300478 and not subject to authorization being sought in the Federal Cell Facility Radioactive Material License. Additionally, the absence of a minor punctuation mark does not impact the physical features of the Federal Cell Facility illustrated on Engineering Drawings 07007-J01, 007-J02, 07007-J03, 14004-C01, 14004-C02, 14004-L01, 14004-U01, 14004-U02, and 230007-G02 (engineering drawing package 23007 has been reindexed from package 20005). However, the minor punctuation mark has been added to the 11e.(2) embankment label in Engineering Drawings 07007-J01, 007-J02, 07007-J03, 14004-C01, 14004-C02, 14004-L01, 14004-U01, 14004-U02, and 23007-G02 (reindexed from 20005-G02) in response to the director's preference.

B-17: Please provide clarity on what these dimensions indicate.

The dimensions noted on Engineering Drawing 14004-C01 has been clarified.



B-18: Given the lack of detail of 11e.(2) dimensions and present-day incompleteness of the 11e.(2) embankment, it is understood that Note (5) notifies the reader that more accurate detail can be given in 11e.(2) License Drawings. However, knowledge of the proposed completed construction conditions of the 11e.(2) cell is imperative in the development of the design of the Federal Cell to correlate geometric relations between the proposed Federal Cell and the existing 11e.(2) cell. Please provide accurate dimensions of proposed 11e.(2) final proposed construction dimensions, including accurate depictions of surrounding infrastructure, in tandem with the proposed design of the Federal Cell.

The detail of 11e.(2) dimensions and its present-day completeness are the subject of Radioactive Material License UT2300478 and independent of the Federal Cell Facility Radioactive Material License Application. The process and timing for closure of the 11e.(2) embankment is solely governed by conditions in License UT2300478. If approved, construction and operation of the proposed Federal Cell Facility will proceed in accordance with the license granted in response to that Application and will similarly be independent of operation or closure of the 11e.(2) embankment. Even so, the final proposed construction dimensions, including depictions of surrounding infrastructure for the 11e.(2) embankment have been added to Engineering Drawing 14004-C01 in response to the director's preference.

B-19: The term "NATURAL GRADE" is utilized in the plans. The elevations indicated appear to be elevations of the surrounding area; however, man-made infrastructure exists in these areas such as roads and berms. Please elaborate on the term "NATURAL GRADE."

The term "Natural Grade" was established and has been in use on director-approved Engineering Drawings since 1988. Even so, the terminology has been clarified on Engineering Drawing 14004-C01 in response to the director's preference.

B-20: The weight scale of the line for "LINER LIMITS (MINIMUM)" does not appear to be consistent with what is observed on the plan view. Please revise Legend item to be consistent as presented in the plan.

The lines on Engineering Drawing 14004-C01 accurately display the appropriate geographic boundaries. The U.S. Nuclear Regulatory Commission (NRC) is silent in 10 CFR 61, NRC's NUREG-1999 and NUREG-1200 on a prohibition of the use of various line weight scales in Engineering Drawings. Additionally, no such prohibition has been promulgated in Utah Administrative Code R313-25. Even so, the legend of Engineering Drawing 14004-C01 has been revised to be consistent with the weight scale for the lines presented in the plan.

B-21: Please update the sheet with a signature and seal.

Professional Engineer seal and signature have been affixed to Engineering Drawings 07007-J03, 14004-C01, 14004-C02, 14004-C03, 14004-C04, 14004-C05, 14004-L01, 14004-U01, 14004-U02, 14004-U03, and 14004-U05.

B-22: The centerline of the ditch appears to go off to the Northeast corner of the 11e.(2) cell. Please provide details on this anomaly.

The centerline anomaly identified in Engineering Drawing 14004-C01 has been clarified.



B-23: There appears to be a leader within the "DRAINAGE DITCH CENTERLINE" throughout this entire plan view. Please revise sheet to either remove the leader or explain significance.

Even though the Clive Facility Site Engineers elected to add a leader within the drainage ditch centerline, the ditch centerline is accurately displayed on Engineering Drawing 14004-C01. The U.S. Nuclear Regulatory Commission (NRC) is silent in 10 CFR 61, NRC's NUREG-1999 and NUREG-1200 on a prohibition of the use of additional illustration leaders. Additionally, no such prohibition has been promulgated in Utah Administrative Code R313-25. Even so, the leaders in question have been removed from Engineering Drawing 14004-C01 in response to the director's preference.

B-24: Please provide more detail on the location, purpose, and monitoring device information of B-2. Refer to RFI B-2 as an overarching comment on the lack of detail for specifications on the instrumentation.

Air quality sampling for airborne particles is accomplished using a continuous low flow pump with a flow rate of 60 liters per minute through a glass fiber filter that can demonstrate a minimum of a 95% dispersed oil particulate (DOP) collection efficiency for 0.3 µm particles. Specifications of the current pumps in service include:

- Air Mover: Oilless, Rotary Vane, Vacuum Pump with 1/4, or 3/4 HP, 115 or 230 VAC
- Control Valve: Mechanical, Heavy Duty, Differential Type Automatic Flow Controller.

Operation and calibration of the air quality sampling pump is addressed in EnergySolutions procedures CL-EV-PR-013, Airborne Particulate (LoVol) and VTD Tritium Monitoring (attached) and CL-IN-PR-422, Air Sample Pump Maintenance and Calibration (attached). Table B-4-1 summarizes the pump models in use and the dates that the pumps were placed in service for each station. Information in this table is continuously revised throughout the year to reflect pump maintenance exchanges, calibrations, and replacements. In Section 4.4 of NUREG-1199, NRC suggests the location, purpose, and operational period monitoring device information be described in the Application and Environmental Monitoring Plan (Appendix E to the Application). Further details are documented and provided for the director's review there in accordance with NRC guidance.

B-25: Slopes are assumed to be approximated in other areas of these drawings. Why is this dimension considered to be not approximate? Please review RFI B-18 and consider consistent dimensions precision throughout these drawings.

The precision noted on Engineering Drawing 14004-C02 has been revised.

B-26: It is assumed that the overall approximated geometry of the Top of Waste correlates to Note (5) of Sheet 14004-C01. Please provide clarity on this sheet (14004-C02) reiterating that statement with consideration of RFI B-18.

The correlation of the Top of Waste notation has been expanded and the precision adjusted on Engineering Drawing 14004-C02 has been revised.



B-27: Ditch invert measures to be a high point in between the Northeast corner invert and Southeastern corner invert. Please clarify or revise the dimensions with consideration of RFI B-18.

The Ditch measurements in between the Northeast and Southeastern corners has been revised and the precision adjusted on Engineering Drawing 14004-C02.

B-28: Leader indicates "GROUND LEVEL" and is inconsistent with the nomenclature used in sheet 14004-C01. Please refer to RFI B-19 and revise to maintain consistent language throughout these drawings.

Consistent nomenclature has been used in Engineering Drawings 14004-C02, and 14004-C03.

B-29: Detail callout should indicate "REVERSE" or similar. Please revise.

The orientation of the detail callout has been revised on Engineering Drawing 14004-C02.

B-30: Detail callout is not "REVERSE" orientation as indicated in Sheet 14004-C03. Please revise.

The orientation of the detail callout has been revised on Engineering Drawing 14004-C02.

B-31: Section view indicates North is to the left and South is to the right. Please revise title of section or reorient the section and associated callouts.

Section title on Engineering Drawing 14004-C02 has been revised.

B-32: It is unclear if Detail 2 on Sheet 14004-C05 also indicates the Cover Detail that will be implemented along the alignment of the CREST. Please callout Detail 2 at the crest (where and if applicable) and revise the title of Detail 2 or create a detail similarly to Detail 2 indicating the cover design and tie-ins.

Detail 2 has been called out at the crest and its title revised on Engineering Drawings 14004-C02 and 14004-C05.

B-33: It is unclear as to what dimension varies here. Are the Clay Liner and Liner Protective Cover the varying dimension keying into existing grade? Are these dimensions generally unknown? Please elaborate or provide notes on this sheet.

Engineering Drawing 14004-C03 has been revised to clarify the dimensional key ins.

B-34: Please elaborate on "natural soil" grade and slopes in Section C to establish minimum excavation dimensions. This can affect the constructability of the Borrow Material backfill and compaction operations as well as tie-ins with the cover system.

Engineering Drawing 14004-C03 has been revised to clarify the descriptions for grading and slopes.

B-35: Please revise to maintain consistency with nomenclature utilized throughout Application. Application text refers to "SIDE ROCK" as "side-slope riprap" and Appendix M utilizes "Side Rock." This is particularly inconsistent when it comes to Detail 4 on this sheet where, technically, this is no longer part of the Side-Slope.

The nomenclature utilized on Engineering Drawings 14004-C03 and 14004-C05 have been revised.



B-36: Please provide clarification as to the correct nomenclature of this fill. Throughout the plans the backfill has been denoted as "CLEAN FILL"; however, this note suggests that the "CLEAN FILL" contains engineered parameters or a potential for contamination. Additionally, consider renaming this backfill to not confuse assumptions that the fill is not contaminated nor possesses radiological contamination.

Clean Fill is defined in the Federal Cell Facility Construction Quality Assurance/Quality Control Manual. The nomenclature has been clarified on Engineering Drawing 14004-C01.

B-37: Please maintain consistent dimension call out with Detail C on Sheet 14004-C03.

The dimensions on Engineering Drawing 14004-C03 have been revised.

B-38: Detail C on Sheet 14004-C03 notes a minimum distance of 45' from Ditch Centerline to Road Centerline. This suggests there should be a minimum distance required between the Ditch Centerline and the Inspection Road Centerline. If that is a correct assumption, a minimum criterion should be established here.

The ditch and inspection road dimensions have been clarified and expanded on Engineering Drawing 14004-C03.

B-39: Has grading the "shoulder" of these inspection roads to slope towards the ditches been considered? This cross section and other details have exhibited a visual of a slope. Please provide detail on the dimensions of these slopes to better visualize and understand the intent of a 12" raised roadway from "borrow material."

The dimensional detail for inspection road slopes has been revised and expanded on Engineering Drawing 14004-C03.

B-40: Is there an assumption that all the material between the existing 11e.(2) embankment and the proposed footprint of the Federal Cell must be excavated to the edges of Clay Liner? There is no true delineation of what currently exists and how EnergySolutions intends to tie into existing conditions. Please provide information to clarify.

The existing conditions between the existing 11e.(2) embankment and proposed Federal Cell Facility have been clarified and expanded on Engineering Drawing 14004-C03.

B-41: Note (5) of sheet 14004-C01 should be reiterated on this sheet to provide clarity that the 11e.(2) dimensions displayed herein are approximated and will be clarified in the 11e.(2) License Drawings. Additionally, please see RFI B-18.

The detail of 11e.(2) dimensions and its present-day completeness are the subject of Radioactive Material License UT2300478 and independent of the Federal Cell Facility Radioactive Material License Application. The process and timing for closure of the 11e.(2) embankment is solely governed by conditions in License UT2300478. If approved, construction and operation of the proposed Federal Cell Facility will proceed in accordance with the license granted in response to that Application and will similarly be independent of operation or closure of the 11e.(2) embankment. Even so, Note (5) from Engineering Drawing 14004-C01 has been repeated on Engineering Drawing 14004-C04 in response to the director's preference.



B-42: The "CLOSURE FENCE TYP" was called out per Detail C of Sheet 14004-C03; however, it is unclear where the fence line is located on this plan view. It is known that a present-day existing fence exists on the west and south sides of the cell but not on the north side. Please indicate where proposed fence line will be located. Additionally, elaborate on Detail C of Sheet 14004-C03 to note which sides of the cell the fence line should be considered for this detail.

The fence line location and cell boundaries have been clarified on Engineering Drawings 14004-C01 and 14004-C03.

B-43: The limits of construction that are under the 11e.(2) license and the Federal Cell license are not clearly defined in this cross section. Please provide clarity if the road and ditches between the cells are part of their respective licenses and/or showcase the delineation within this plan set.

The limits of construction between the 11e.(2) and Federal Cell Facility have been clarified on Engineering Drawing 14004-C04.

B-44: No cross-section nor detail suggests that the filter zone will rest on the "natural ground." Criteria should be established for subgrade material upon which cover material shall be placed atop. Please review RFI B-34.

Filter zone and subgrade detail have been added to Engineering Drawing 14004-C05.

B-45: The "-8" and "-6" within these leaders should be an exponent.

The exponentials noted are correct on Engineering Drawing 14004-C05 and of equivalent format to that used on legacy Engineering Drawings since 1990. The Clive Site Engineer elected to use this legacy design to make it clear to the reader. The U.S. Nuclear Regulatory Commission (NRC) is silent in 10 CFR 61, NRC's NUREG-1999 and NUREG-1200 on a prohibition on the use of this exponential format to assist readers. Additionally, no such prohibition has been promulgated in Utah Administrative Code R313-25. Even so, the exponential notation has been adjusted on Engineering Drawing 14004-C05 in response to the director's preference.

B-46: Note (2) can potentially leave ambiguity to the seeding methodology. If EnergySolutions proposes seeding within the plan set, please provide additional information on "approved seed mixture and method" or reference where the reader may locate this information.

Note (2) has been clarified on Engineering Drawing 14004-C05.

B-47: Linework is not noted in the Legend or called out on the plan.

Linework has been added to the legends on Engineering Drawings 14004-L01 and 14004-U01.

B-48: The scale does not appear to be correct. Please provide full-size sheets to the Division to verify scale and/or revise sheet to correct scale.

The scale notation has been corrected on Engineering Drawings 14004-L01 and 14004-U01.



B-49: Refer to RFI B-13. Additionally, please reiterate Note (2) of sheet 14004-C01 to provide clarity in this sheet of the characteristics of the Clive Monument as a control point for these coordinates.

The Clive Monument was established as a positioning central point to support a separate radioactive material license granted prior in 1994 and is not being adjusted to support the proposed Federal Cell Facility. However, the scale notation has been corrected and Note (2) added on Engineering Drawings 14004-U01 and 14004-U02.

B-50: According to Section 3.1.11 within the text of the Application, the "Buffer Zone" is defined as "[...] buffer zone must be no less than 100 ft between the rectangle defined by the four control points that define the cell limits on Engineering Drawing 14004-U01 (Appendix B) and the perimeter fence." It is unclear on this Sheet if the Buffer Zone adequately meets this minimum requirement due to the questionable scale of the drawing (refer to B-48), lack of dimensional callouts, and any additional notes that may provide clarity on the requirements that are highlighted in the text or relating Appendices. Please provide clarity on these characteristics at a minimum.

The Buffer Zone location has been clarified on Engineering Drawing 14004-L01.

B-51: Please consider a different line weight and type for the "FEDERAL CELL LIMITS." Line is utilized in incorrect ways within each of these cross sections.

This request includes a declarative statement that the "[1]ine is utilized in incorrect ways within each of these cross sections." The U.S. Nuclear Regulatory Commission (NRC) is silent in 10 CFR 61, NRC's NUREG-1999 and NUREG-1200 on a definition of a "correct way" lines are to be used within these cross sections. Similarly, no such definition has been promulgated in Utah Administrative Code R313-25. Even so, the line weights and types have been adjusted on Engineering Drawing 14004-U02 in response to the director's preference.

B-52: It is unclear why these dimensions are approximated, and lack of dimensional call outs exists within these cross sections. These dimensions must indicate minimum/maximum dimensions to satisfy minimum/maximum design requirements as stated within the text of the Application and Appendices. Ambiguity within these dimensions can lead to misinterpretations of the limits of Depleted Uranium. Additionally, please provide clarifications of the dimensions and vertical offsets.

The dimensional precision has been unified and expanded on Engineering Drawing 14004-U02.

B-53: This text refers to two different lines; however, it is unclear which paragraph is referring to a specific line. Please revise this sheet to contain two separate leaders for each paragraph and lead to associated linework.

The leaders and linework have been revised on Engineering Drawing 14004-U05 (which has replaced 18008-U04).



B-54: This sheet lacks a Legend to provide clarification of the representation of the linework on this sheet.

A legend has been added to Engineering Drawings 14004-U05, 23007-C01, 23007-C02, 23007-C03, 23007-C04, 23007-C05, 23007-C06, 23007-C07, 23007-C08, 23007-C09, 23007-C10, and 23007-G02 (engineering drawing package 23007 has been reindexed from package 20005).

B-55: The scale appears to be green. Please revise scale or provide clarification as to the significance of having the scale in this format.

The licensed embankment scales are placed and graduated correctly on Engineering Drawings 14004-U05, 23007-C01, 23007-C02, 23007-C03, 23007-C04, 23007-C05, 23007-C06, 23007-C07, 23007-C08, 23007-C09, 23007-C10, and 23007-G02 (engineering drawing package 23007 has been reindexed from package 20005). The Clive Site Engineer elected to apply green highlight to the scale marker as an aid to the reader. The U.S. Nuclear Regulatory Commission (NRC) is silent in 10 CFR 61, NRC's NUREG-1999 and NUREG-1200 on a prohibition on such use of colored scale markers to assist readers. Additionally, no such prohibition has been promulgated in Utah Administrative Code R313-25. Even so, the scale appearance has been revised on Engineering Drawing 14004-U05, 23007-C01, 23007-C02, 23007-C03, 23007-C04, 23007-C05, 23007-C06, 23007-C07, 23007-C08, 23007-C09, 23007-C10, and 23007-G02 (engineering drawing package 23007 has been reindexed from package 20005) in response to the director's preference.

B-56: Font is very small and illegible for many of the callouts and text within linework. Please revise sheet to a consistent format scale so text is clear and legible.

The text format has been increased on Engineering Drawing 23007-C01, 23007-C02, 23007-C07, and 23007-C10 (engineering drawing package 23007 has been reindexed from package 20005).

B-57: Please identify this object.

Object descriptions have been added to Engineering Drawings 23007-C02 and 23007-C05 (engineering drawing package 23007 has been reindexed from package 20005).

B-58: Please provide the timeframe for when these aerial images were taken to provide insight to the timeline of construction of the utilities at the facility.

Condition 10.D of Radioactive Material License UT2300249 requires annual aerial surveys be performed. The timeframe for when aerial images were taken has been noted on Engineering Drawing 14004-U05, 23007-C01, 23007-C02, 23007-C03, 23007-C04, 23007-C05, 23007-C06, 23007-C07, 23007-C08, 23007-C09, and 23007-C10 (engineering drawing package 23007 has been reindexed from package 20005).



B-59: The purpose of this drawing sheet appears to be to orient the reader to match the linework through each map. Please consider the following:

a. Hide text and irrelevant linework on this sheet to provide a clearer picture for the reader of the facilities and delineated Utility Map sections.

b. Provide Matchlines on the respective sheets so that it is clear to the reader the orientation of each Utility Map.

The linework and matchlines have been revised on Engineering Drawing 23007-G02 (engineering drawing package 23007 has been reindexed from package 20005).

#### General Notes and Overarching RFIs:

1. The Groundwater monitoring plan does not address influences of the Federal Cell construction with existing surrounding infrastructure (such as CAW and 11e.(2)). No plan sheet suggests that new Groundwater Monitoring devices will be installed as a result of this new facility. If EnergySolutions proposes to install additional monitoring devices (of any kind), there should be a plan sheet indicating proposed installation location, device type, depths (if applicable), etc.

A modification to Groundwater Quality Discharge Permit UGW450005 has been requested to reflect depiction of the Federal Cell Facility on the applicable Engineering Drawings. The modification requests that existing wells GW-57, GW-28, GW-58, and GW-63 be designated as upgradient to the Federal Cell Facility and existing wells GW-26, GW-94, GW-95, GW-27, and GW-27-D considered for downgradient compliance monitoring of the Federal Cell Facility (in accordance with UAC R315-308-2(2)).

2. Air monitoring radiological "array" is not clear. The array is depicted from the center of the Class A West Cell. For this application, there should be a focus on the Federal Cell and proposed monitoring instrumentation to justify the construction of the Federal Cell.

The descriptions on Engineering Drawing 07007-J01 have been expanded to clarify the arrangement of the air monitoring array and monitoring instrumentation currently in use. Low-volume atmospheric dust monitoring stations are used to evaluate the effectiveness of radiation safety measures applied during bulk waste management within the Class A West embankment authorized by Radioactive Material License UT2300249. Since no bulk DU will be managed at the Federal Cell Facility, current instrumentation and monitoring locations are appropriate to support the Federal Cell Facility.

3. Based on delineated elevations, surface water appears to be flowing towards the Southeastern corner of the cell. What is EnergySolutions plan to manage this water from that point?

Condition I.E.7 of the Groundwater Quality Discharge Permit UGW450005 designates as Priority 1, removal of precipitation falling and/or collecting within the licensed footprint of an active waste embankment when there is a potential that it may encounter waste. This approach will be required for the proposed Federal Cell Facility.



4. Drawings should be submitted in full size and originally stamped as an official submission. Some of the scales indicated in this plan sheet could not be verified though appear to be incorrect.

Professional Engineering stamp and certifications have been added to all applicable Engineering Drawings. The accuracy of drawing scales, set appropriate to accurately represent each drawings information, have been confirmed.

5. What are the geotechnical characteristics for the "Clean Fill"? Does this "Clean Fill" have a potential to be contaminated? There needs to be additional elaboration as to the context of "Clean Fill" throughout these drawings. Additionally, the word "clean" can be misinterpreted as "non-contaminated." What are the extents of contamination within the Clean Fill from the contact point of the Depleted Uranium placement? If it is within the Application, the Drawings do not indicate any notes or references to provide clarity.

Along with other construction materials used at the Federal Cell Facility, fill characteristics are described in the Federal Cell Facility Construction Quality Assurance/Quality Control Manual (Appendix C to the Application).

6. The extents and limits of the Depleted Uranium (waste) placement are delineated on these plans; however, there is a lack of detail on methodologies of placing the waste within the cell. It is unclear in both the plans and the text how the waste will be stacked/oriented and backfilled to confirm that the material is in complete encapsulation from the surrounding environment, provide insight on the integrity of the backfill, and all additional considerations outlined in NUREG-1200 SRP 3.

Controlled low-strength material (CLSM) and federally generated depleted uranium waste placement is described in Section 4.3 of the Application, and will proceed in accordance with Work Element, Depleted Uranium Waste Placement in the Federal Cell Facility Construction Quality Assurance/Quality Control Manual (see Appendix C of the Application) and procedures FCF-CH-PR-251 Federal Cell Facility Container Management and Disposal and FCF-LD-PR-020 Management and Disposal of FCF (found in Appendix I of the Application)

7. In light of RFI B-9, there is a question of appropriate scale and accurate geographical location and orientation throughout this Appendix. EnergySolutions should ensure that the drawings contain a high level of precision to orient objects and plan view. There are many dimensions on this sheet that are denoted as "~X". It is assumed that EnergySolutions has approximated these dimensions. This is unacceptable in a plan set due to the high degree of ambiguity that can occur during construction and for reviewing information presented in the Application. It is imperative for EnergySolutions to consider RFI B-18 for this plan set and establish accurate or minimum and maximum dimensions for the Division to review with minimal uncertainty of EnergySolutions' intentions of construction.

Measurements on Engineering Drawings have been confirmed and precision unified. The "-X" notation has been removed from all Engineering Drawings.





If you have further questions regarding the response to the director's request of DRC-2023-004939, please contact me at (801) 649-2000.

Sincerely,

Vern C. Rogers Digitally signed by Vern C. Rogers DN: cn=Vern C. Rogers, o=EnergySolutions, ou=Waste Management Division, email=vcrogers@energysolutions. com, c=US Date: 2023.12.29 12:57:08 -07'00'

Vern C. Rogers Director, Regulatory Affairs

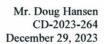
#### enclosure

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 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 that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



# Table 1 – Engineering Drawing Tracking (comments B-3 through B-25)

ENGINEERING DRAWING	B- 3	B- 4	B- 5	B- 6	<b>B-</b> 7	B- 8	B- 9	B- 10	B- 11	B- 12	B- 13	B- 14	B- 15	B- 16	B- 17	B- 18	B- 19	B- 20	B- 21	B- 22	B- 23	B- 24	B- 25
0801-G04 –Radiologically Controlled Area;	X																						
07007-J01 –Environmental Monitors;	X	X												X				9 ( )				X	
07007-J02 –Groundwater Monitoring Wells;	X	X	X											X									
07007-J03 –Fenceline TLDs;	X	X		X	X	X	X							X					X	1			
14004-C01 –Federal Cell Facility Embankment Features and Controls;								X	X	X	X	X	X	X	X	X	X	X	X	X	X		
14004-C02 –Federal Cell Facility Embankment Cross Sections;														X					X				X
14004-C03 –Federal Cell Facility –Sections and Details 1 of 3;																			X				
14004-C04-Federal Cell Facility -Sections and Details 2 of 3;																			X				
14004-C05–Federal Cell Facility –Sections and Details 3 of 3;																			X				
14004-L01-Federal Cell Facility -Embankment Location Map and Topo;													X	X					X				
14004-U01–Federal Cell Facility –Disposal Cell Buffer Zone;					Y									X					X				
14004-U02-Federal Cell Facility -Disposal Cell Waste Limits -Latitudes and Longitudes;														X	=				X				
14004-U03—Federal Cell Facility —Disposal Cell Waste Limits —Cross Sections;					0 1														X				
14004-U05-Surrounding Property Ownership Map;																							



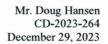


ENGINEERING DRAWING	B- 3	B- 4	B- 5	B- 6	B-	B- 8	B- 9	B- 10	B- 11	B- 12	B- 13	B- 14	B- 15	B- 16	B- 17	B- 18	B- 19	B- 20	B- 21	B- 22	B- 23	B- 24	B- 25
23007-C01-Site Utility Map 1 (reindexed from 20005-C01);																							
23007-C02-Site Utility Map 2 (reindexed from 20005-C02);																							
23007-C03-Site Utility Map 3 (reindexed from 20005-C03);																							
23007-C04-Site Utility Map 4 (reindexed from 20005-C04);																							
23007-C05-Site Utility Map 5 (reindexed from 20005-C05);																							
23007-C06-Site Utility Map 6 (reindexed from 20005-C06);																							
23007-C07-Site Utility Map 7 (reindexed from 20005-C07);																							
23007-C08-Site Utility Map 8 (reindexed from 20005-C08);																							
23007-C09-Site Utility Map 9 (reindexed from 20005-C09);																							
23007-C10-Site Utility Map 10 (reindexed from 20005-C10);																							
23007-G02 –General Site Utility Map (reindexed from 20005-G02);														X		-							



# Table 2 – Engineering Drawing Tracking (comments B-26 through B-46)

ENGINEERING DRAWING	B- 26	B- 27	B- 28	B- 29	B- 30	B- 31	B- 32	B- 33	B- 34	B- 35	B- 36	B- 37	B- 38	B- 39	B- 40	B- 41	B- 42	B- 43	B- 44	B- 45	B- 46
0801-G04 –Radiologically Controlled Area;						-	02	-		-			00							10	
07007-J01 –Environmental Monitors;																					
07007-J02 –Groundwater Monitoring Wells;																		1			
07007-J03 -Fenceline TLDs;																		1			
14004-C01 –Federal Cell Facility Embankment Features and Controls;												_		1			X		_		
14004-C02 –Federal Cell Facility Embankment Cross Sections;	X	X	X	X	X	X	X		1												
14004-C03 –Federal Cell Facility –Sections and Details 1 of 3;			X					X	X	X	X	X	X	X	X		X				
14004-C04–Federal Cell Facility –Sections and Details 2 of 3;						7										X		X			
14004-C05–Federal Cell Facility –Sections and Details 3 of 3;							X			X									X	X	X
14004-L01-Federal Cell Facility -Embankment Location Map and Topo;																					
14004-U01–Federal Cell Facility –Disposal Cell Buffer Zone;																					
14004-U02-Federal Cell Facility -Disposal Cell Waste Limits -Latitudes and Longitudes;																					
14004-U03-Federal Cell Facility -Disposal Cell Waste Limits -Cross Sections;																					
14004-U05–Surrounding Property Ownership Map;																					



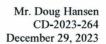


ENGINEERING DRAWING	B- 26	B- 27	B- 28	B- 29	B- 30	B- 31	B- 32	B- 33	B- 34	B- 35	B- 36	B- 37	B- 38	B- 39	B- 40	B- 41	B- 42	B- 43	B- 44	B- 45	B- 46
23007-C01-Site Utility Map 1 (reindexed from 20005- C01);											2										
23007-C02-Site Utility Map 2 (reindexed from 20005- C02);																					
23007-C03-Site Utility Map 3 (reindexed from 20005- C03);																					
23007-C04-Site Utility Map 4 (reindexed from 20005- C04);																					
23007-C05-Site Utility Map 5 (reindexed from 20005- C05);												2									
23007-C06-Site Utility Map 6 (reindexed from 20005- C06);																					
23007-C07-Site Utility Map 7 (reindexed from 20005- C07);																					
23007-C08-Site Utility Map 8 (reindexed from 20005- C08);																					
23007-C09-Site Utility Map 9 (reindexed from 20005- C09);																					
23007-C10-Site Utility Map 10 (reindexed from 20005- C10);																					
23007-G02 –General Site Utility Map (reindexed from 20005-G02);																					



# Table 3 – Engineering Drawing Tracking (comments B-47 through B-58)

ENGINEERING DRAWING	B-47	B-48	B-49	B-50	B-51	B-52	B-53	B-54	B-55	B-56	B-57	B-58	B-58
0801-G04 –Radiologically Controlled Area;													
07007-J01 –Environmental Monitors;													
07007-J02 –Groundwater Monitoring Wells;													
07007-J03 –Fenceline TLDs;													
14004-C01 –Federal Cell Facility Embankment Features and Controls;													
14004-C02 –Federal Cell Facility Embankment Cross Sections;													
14004-C03 –Federal Cell Facility – Sections and Details 1 of 3;													
14004-C04–Federal Cell Facility – Sections and Details 2 of 3;													
14004-C05-Federal Cell Facility - Sections and Details 3 of 3;													
14004-L01–Federal Cell Facility – Embankment Location Map and Topo;	X	X		X									
14004-U01–Federal Cell Facility – Disposal Cell Buffer Zone;	X	X	X										
14004-U02–Federal Cell Facility – Disposal Cell Waste Limits –Latitudes and Longitudes;			X		X	X							
14004-U03–Federal Cell Facility – Disposal Cell Waste Limits –Cross Sections;													
14004-U05-Surrounding Property Ownership Map;							X	X	X			X	
23007-C01-Site Utility Map 1 (reindexed from 20005-C01);								X	X	X		X	
23007-C02-Site Utility Map 2 (reindexed from 20005-C01);								X	X	X	X	X	
23007-C03-Site Utility Map 3 (reindexed from 20005-C01);								X	X			X	

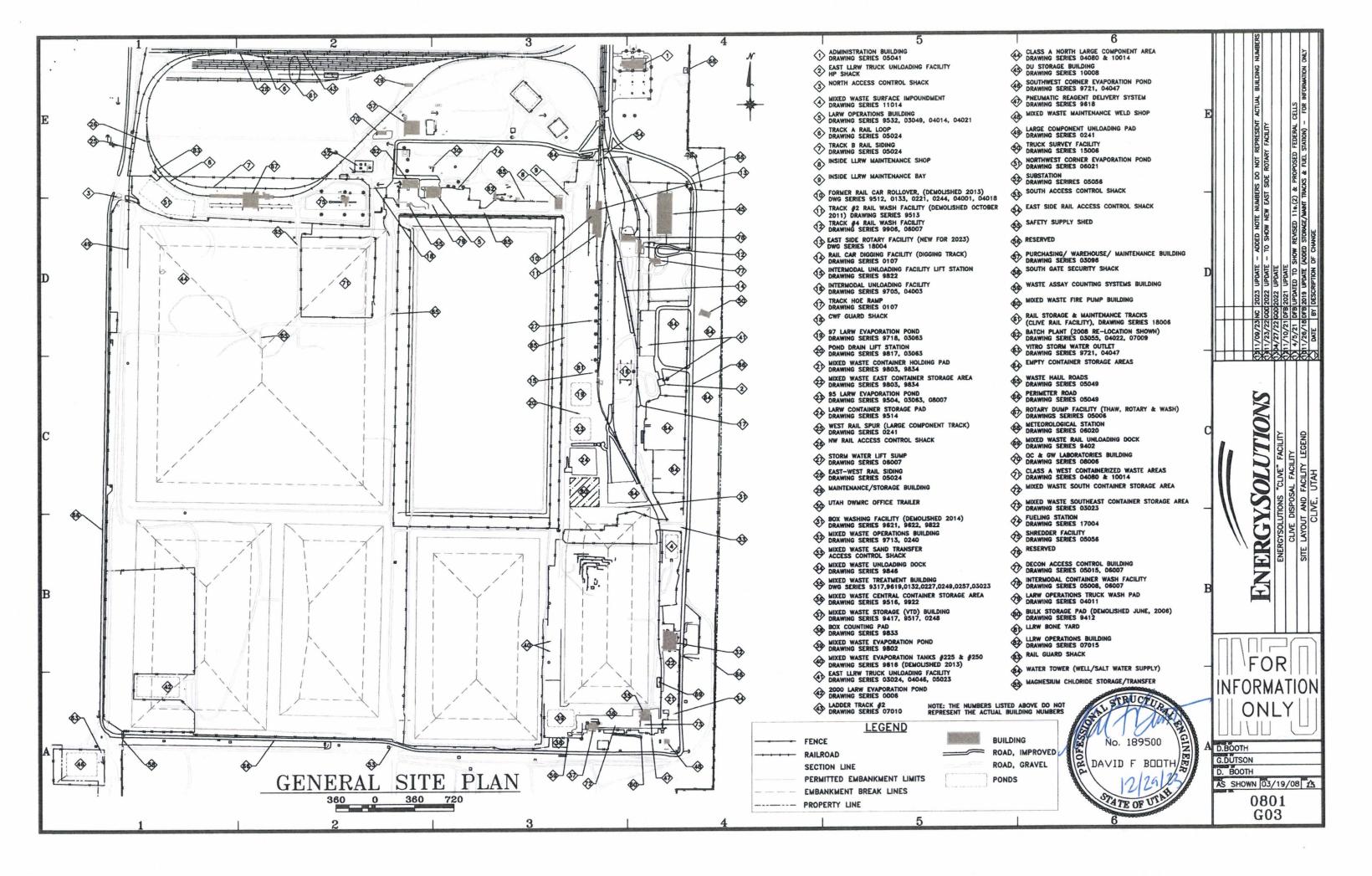


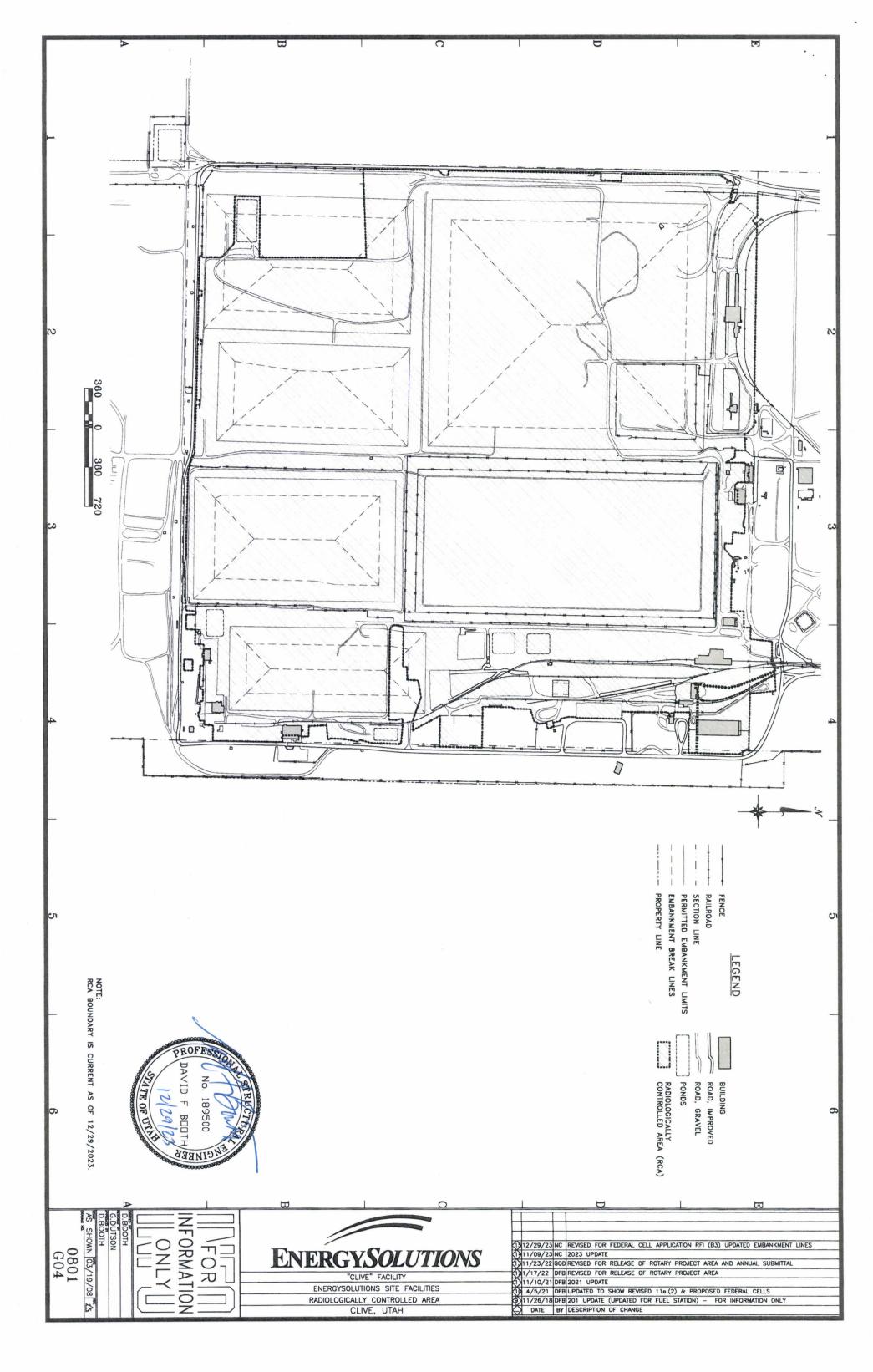


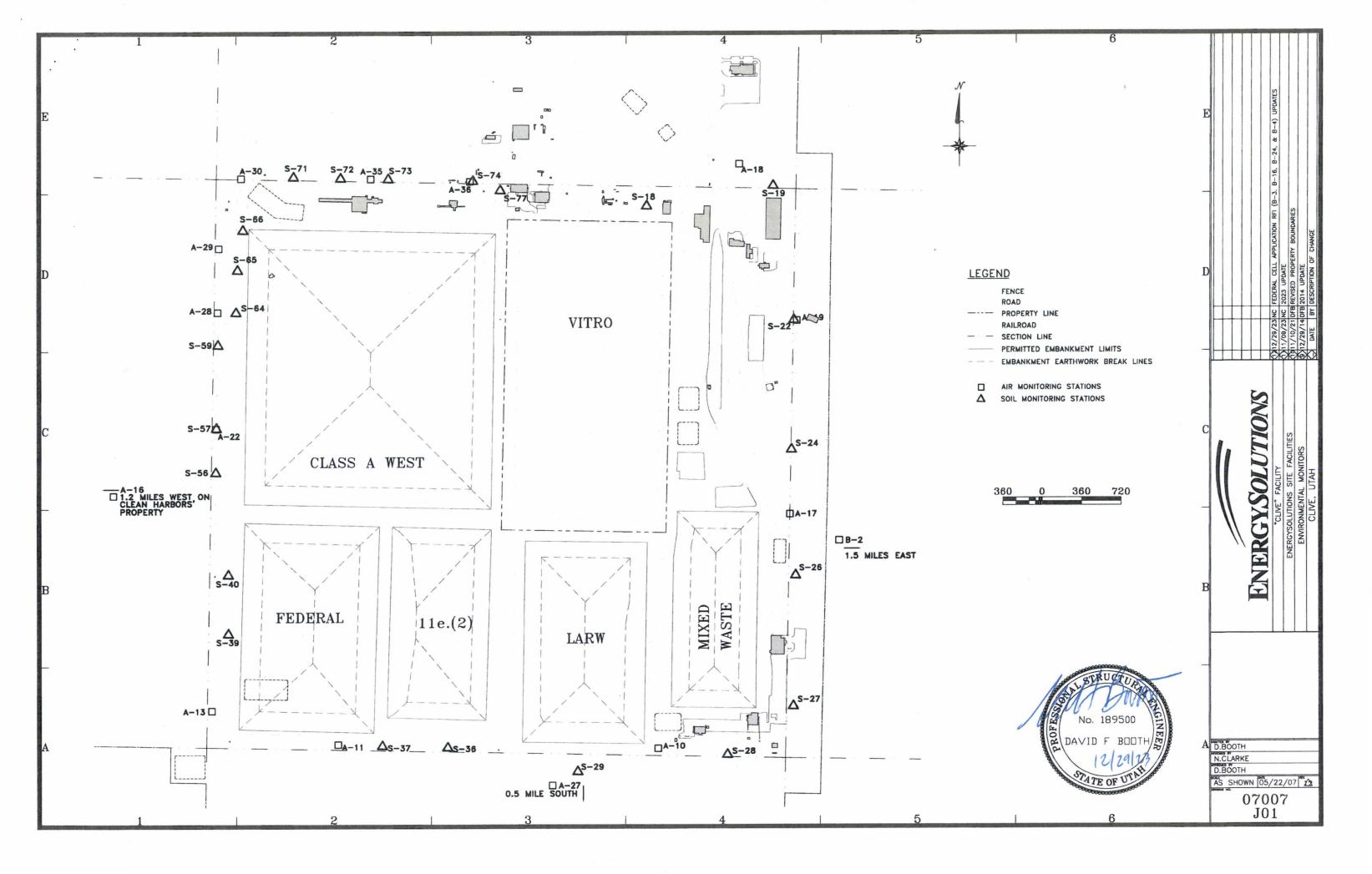
ENGINEERING DRAWING	B-47	B-48	B-49	B-50	B-51	B-52	B-53	B-54	B-55	B-56	B-57	B-58	B-58
23007-C04-Site Utility Map 4 (reindexed from 20005-C04);								X	X			X	
23007-C05-Site Utility Map 5 (reindexed from 20005-C05);								X	X		X	X	
23007-C06-Site Utility Map 6 (reindexed from 20005-C06);								X	X			X	
23007-C07-Site Utility Map 7 (reindexed from 20005-C07);								X	X	X		X	
23007-C08-Site Utility Map 8 (reindexed from 20005-C08);								X	X			X	
23007-C09-Site Utility Map 9 (reindexed from 20005-C09);								X	X			X	
23007-C10-Site Utility Map 10 (reindexed from 20005-C10);								X	X	X		X	
23007-G02 –General Site Utility Map (reindexed from 20005-G02);								X	X				X

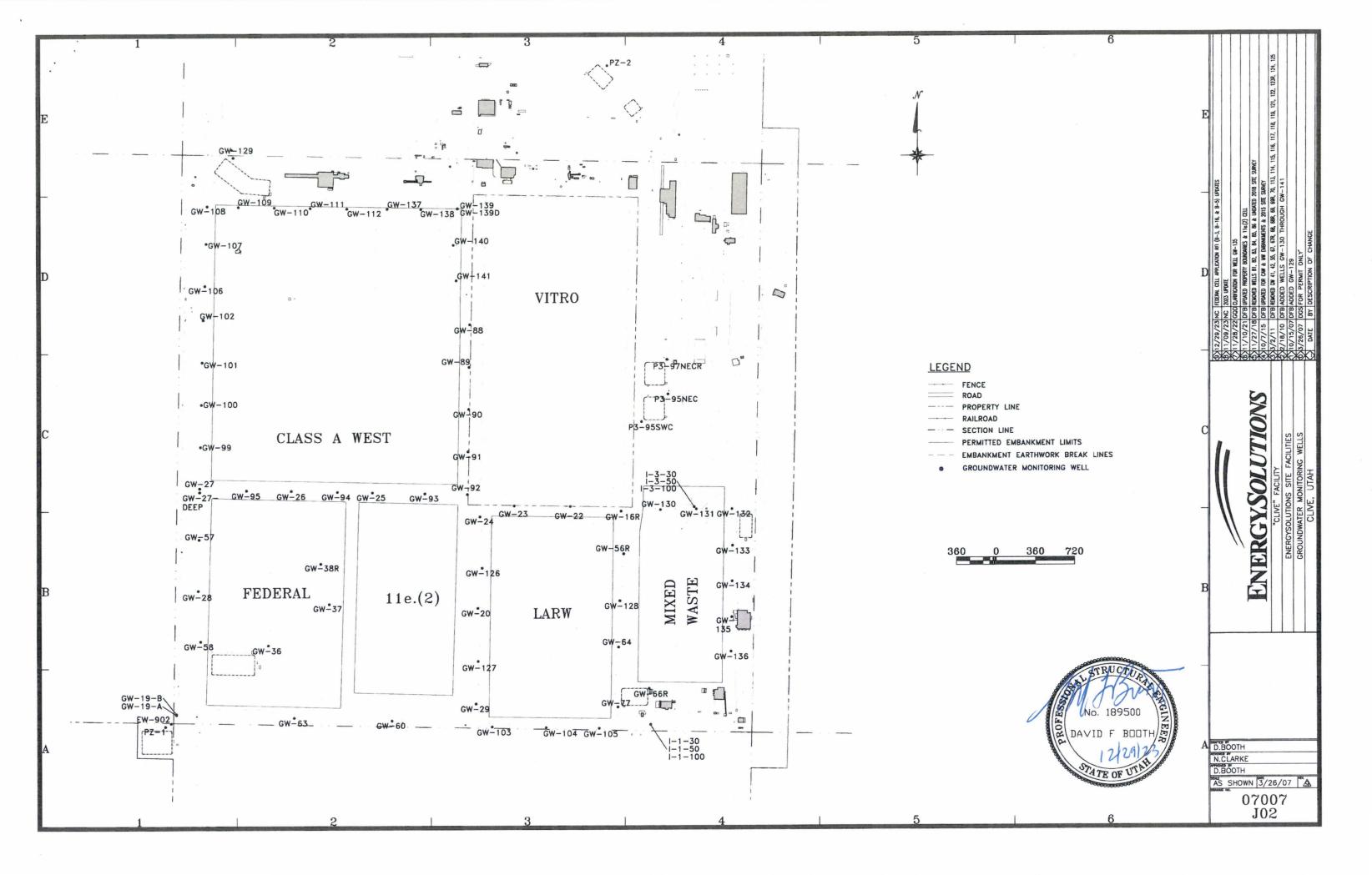


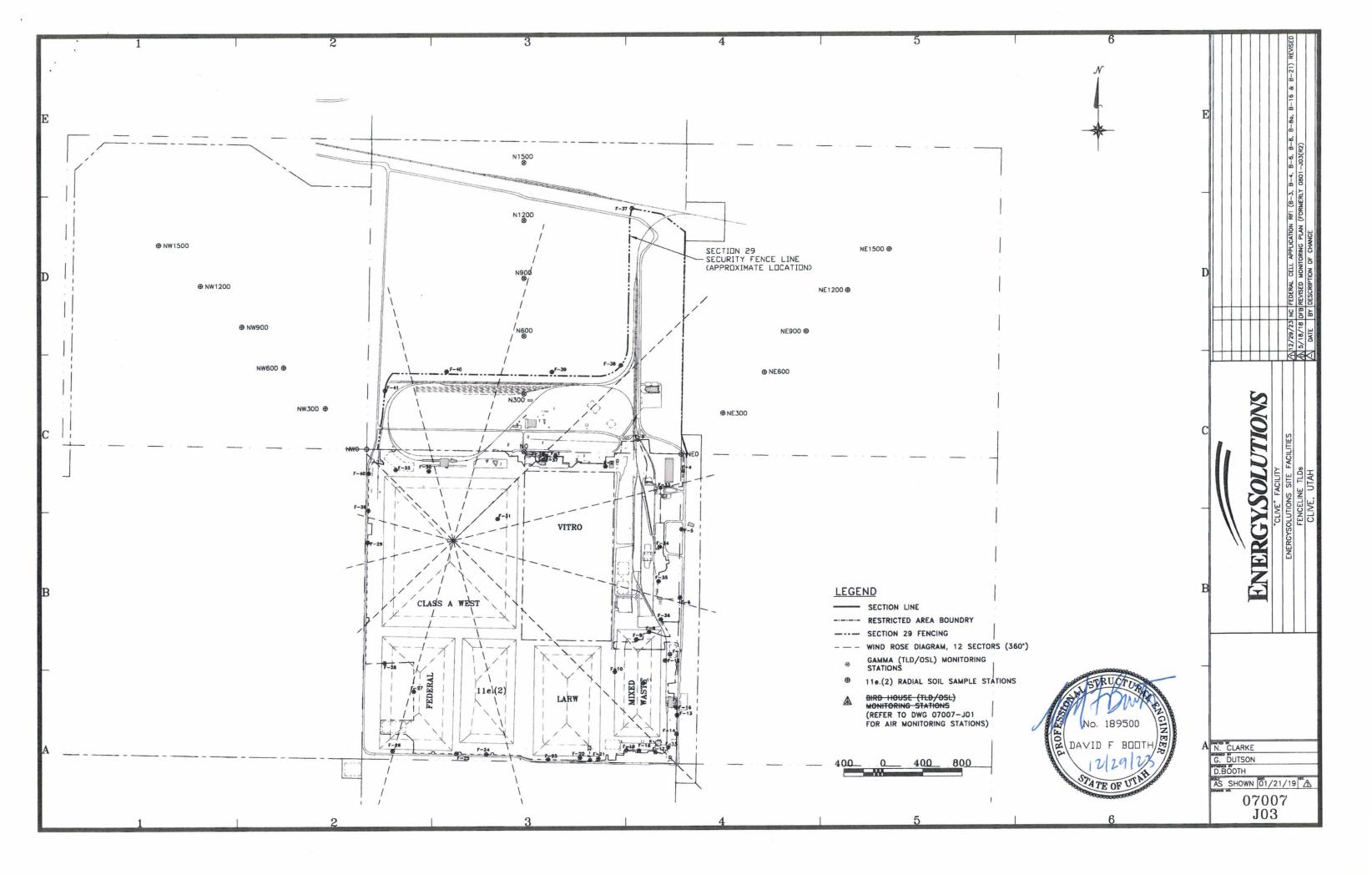
### **ENGINEERING DRAWINGS**

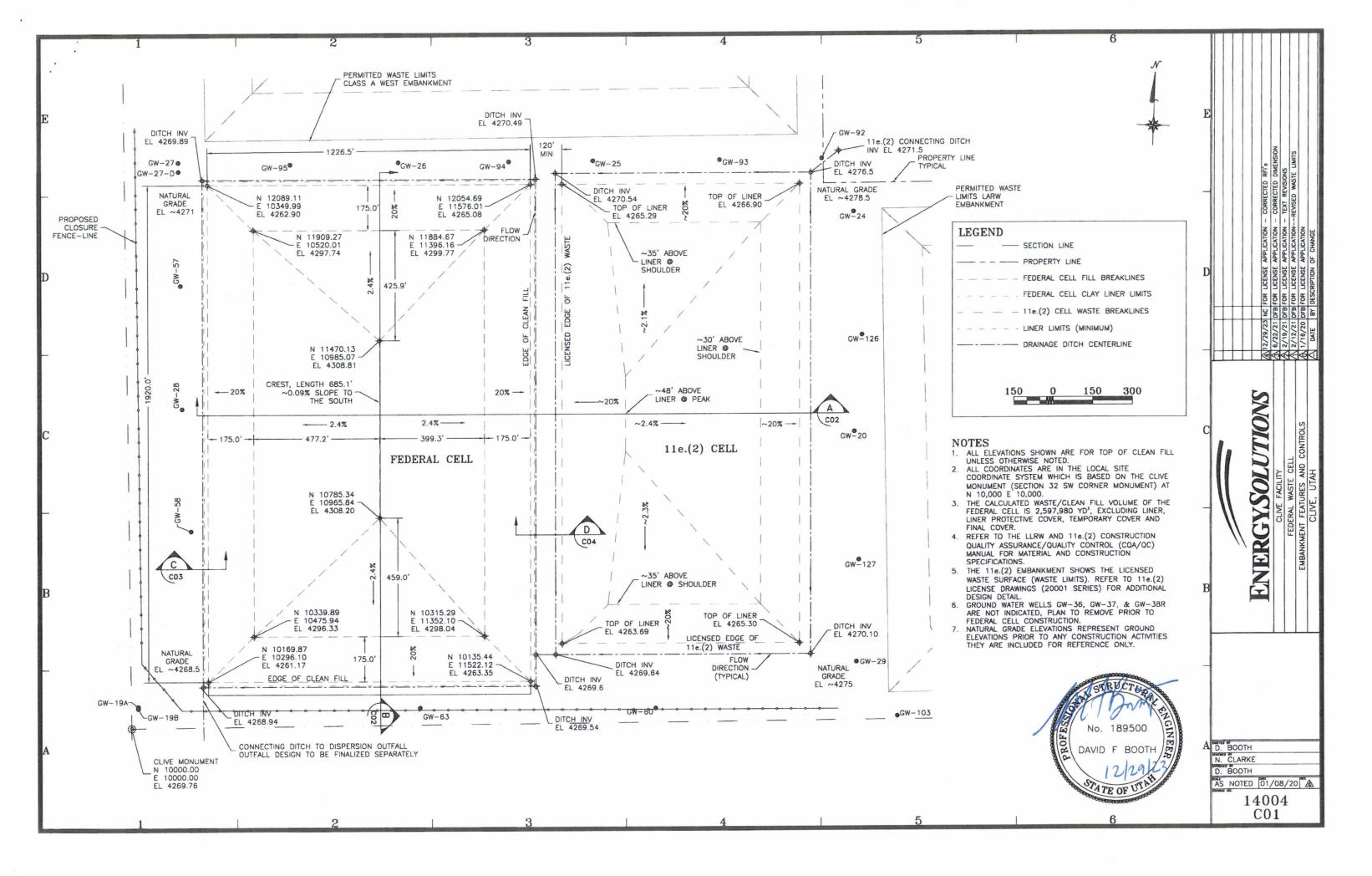


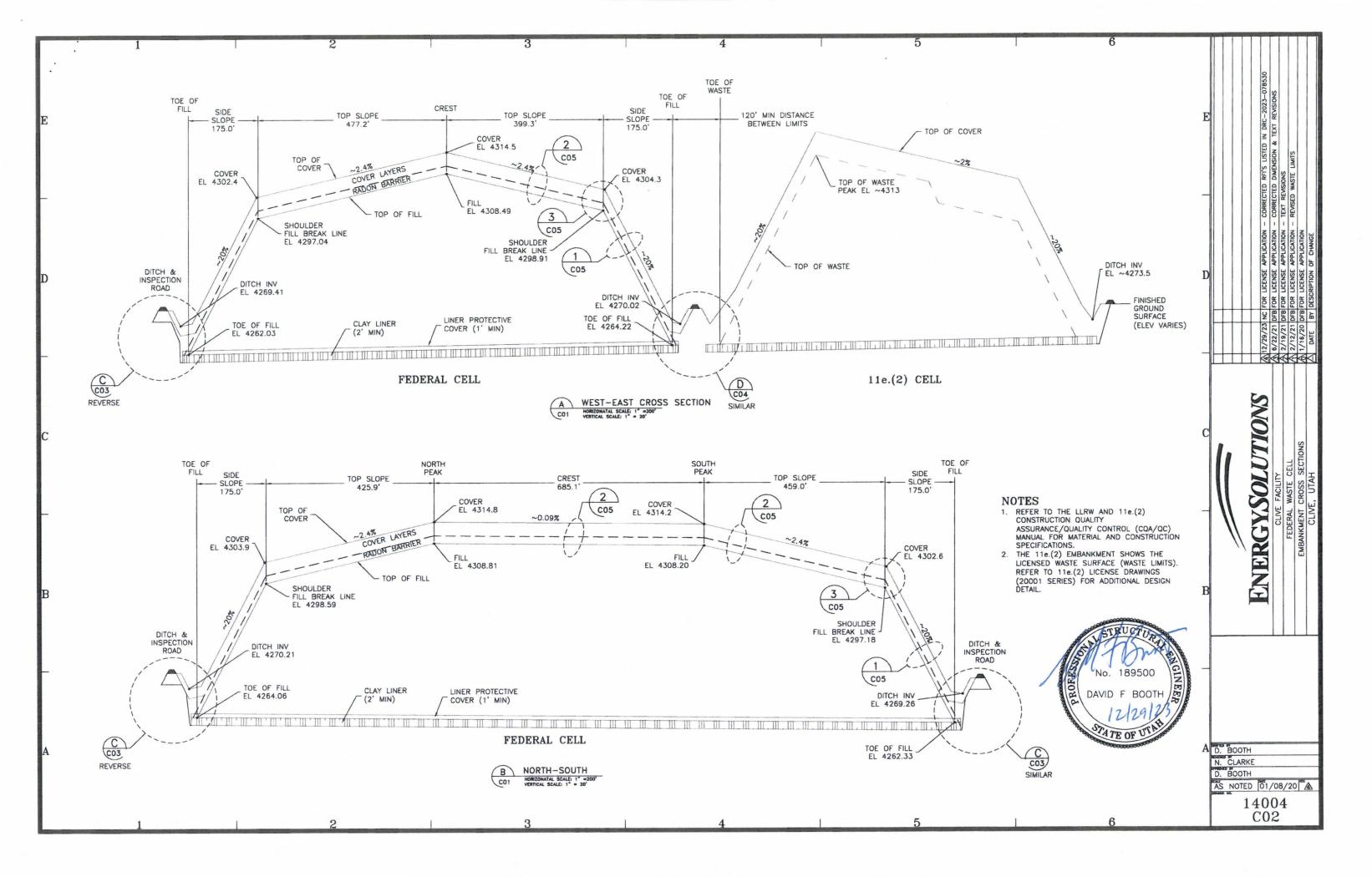


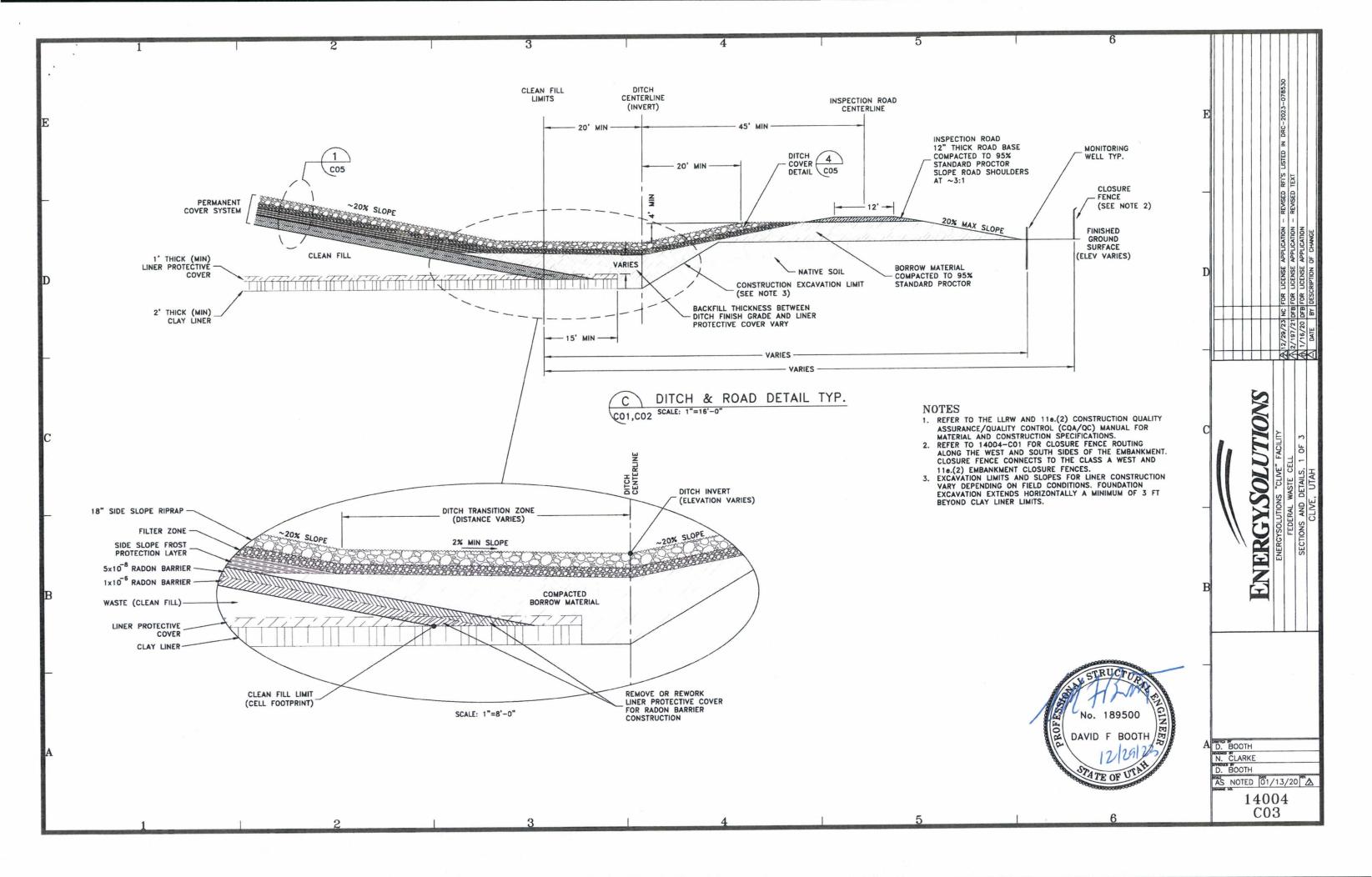


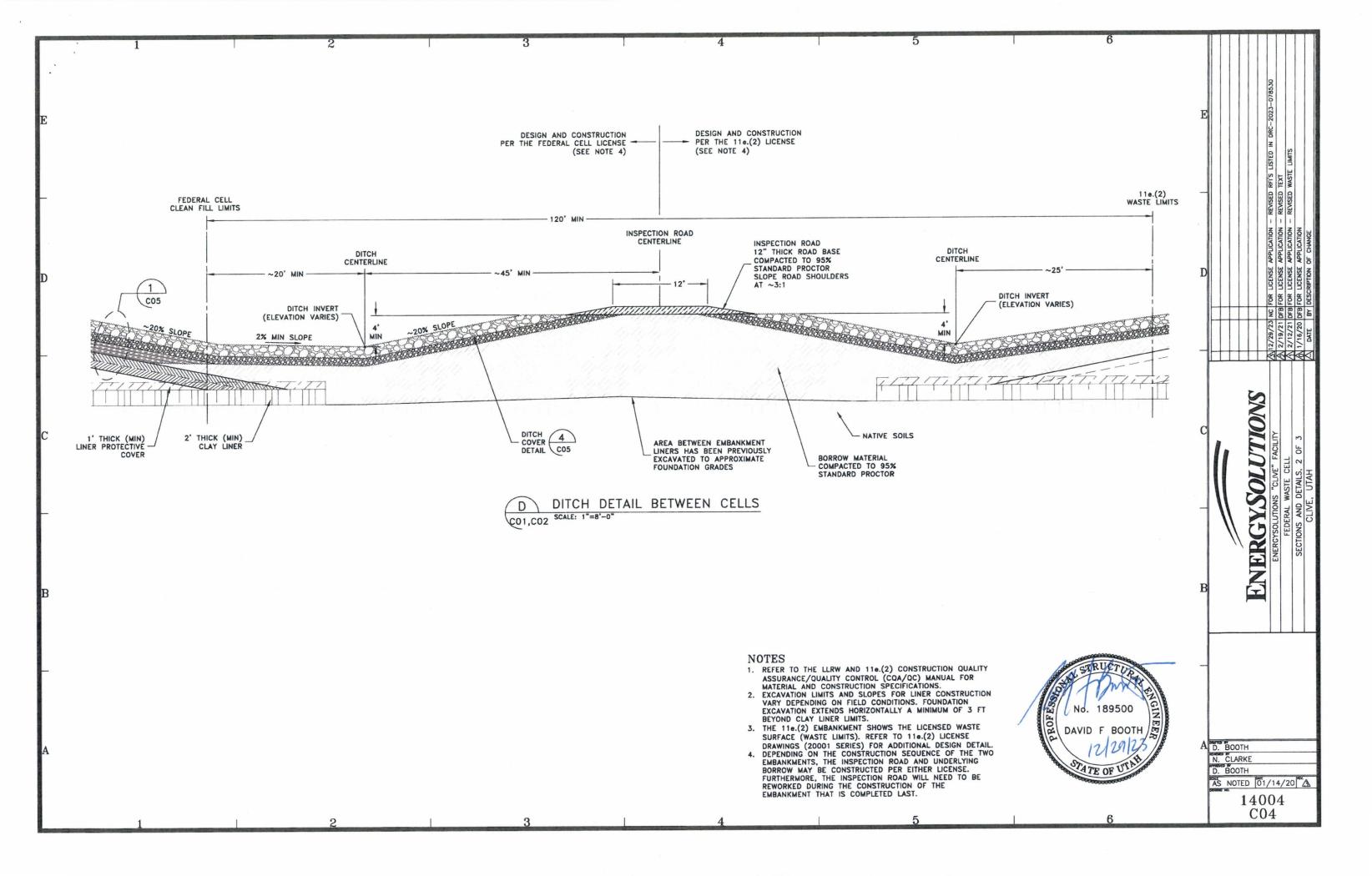


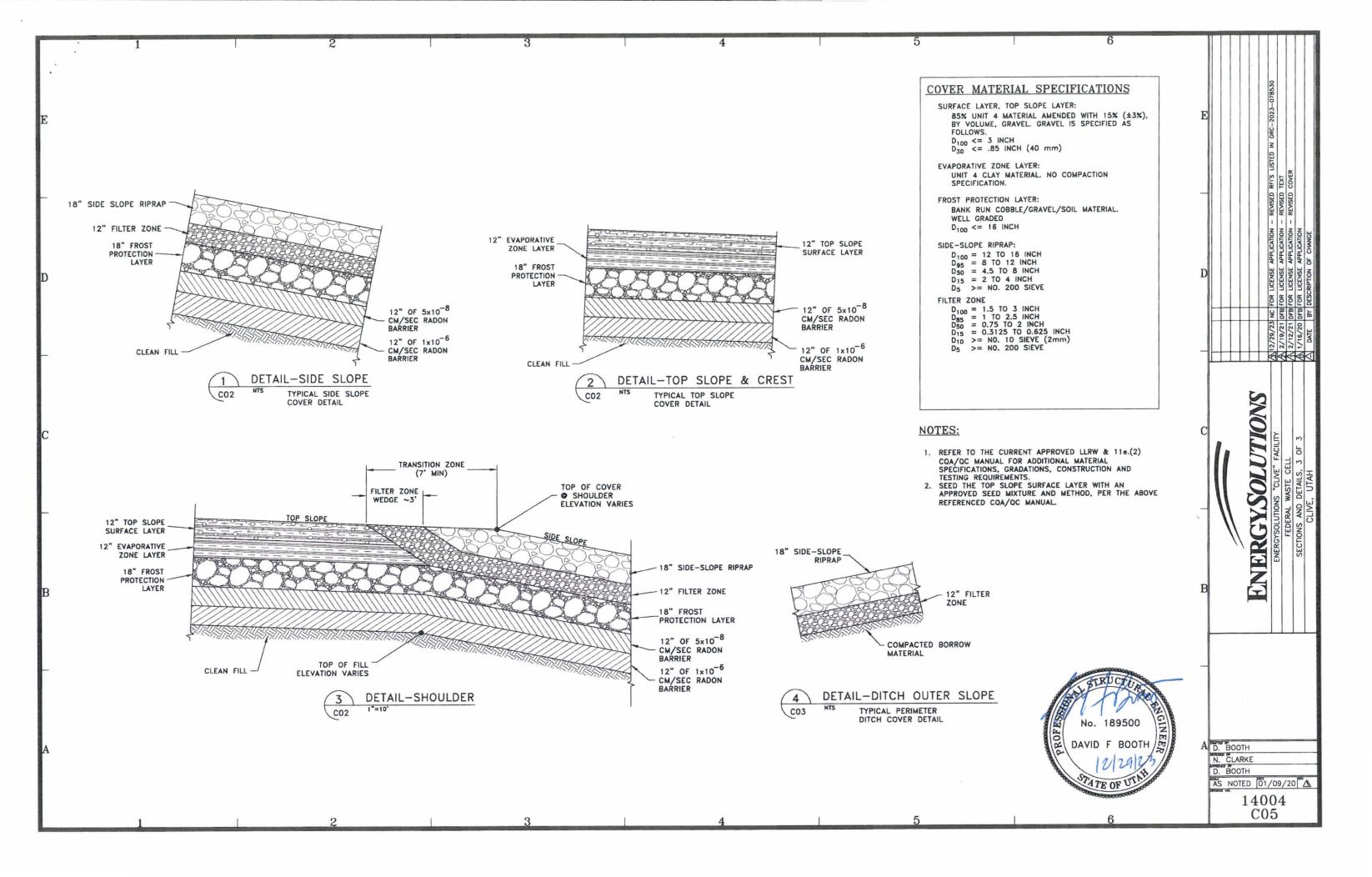


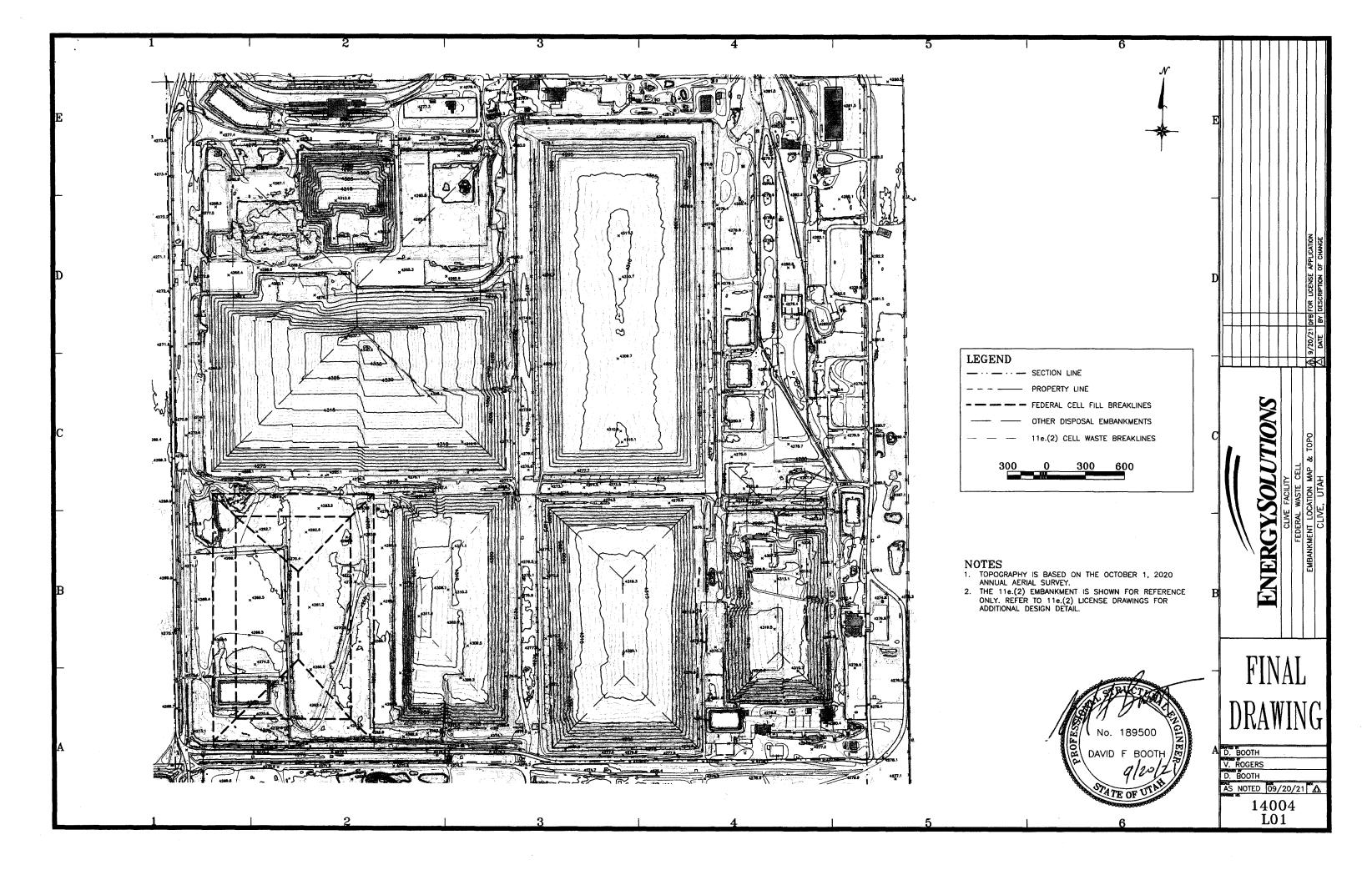


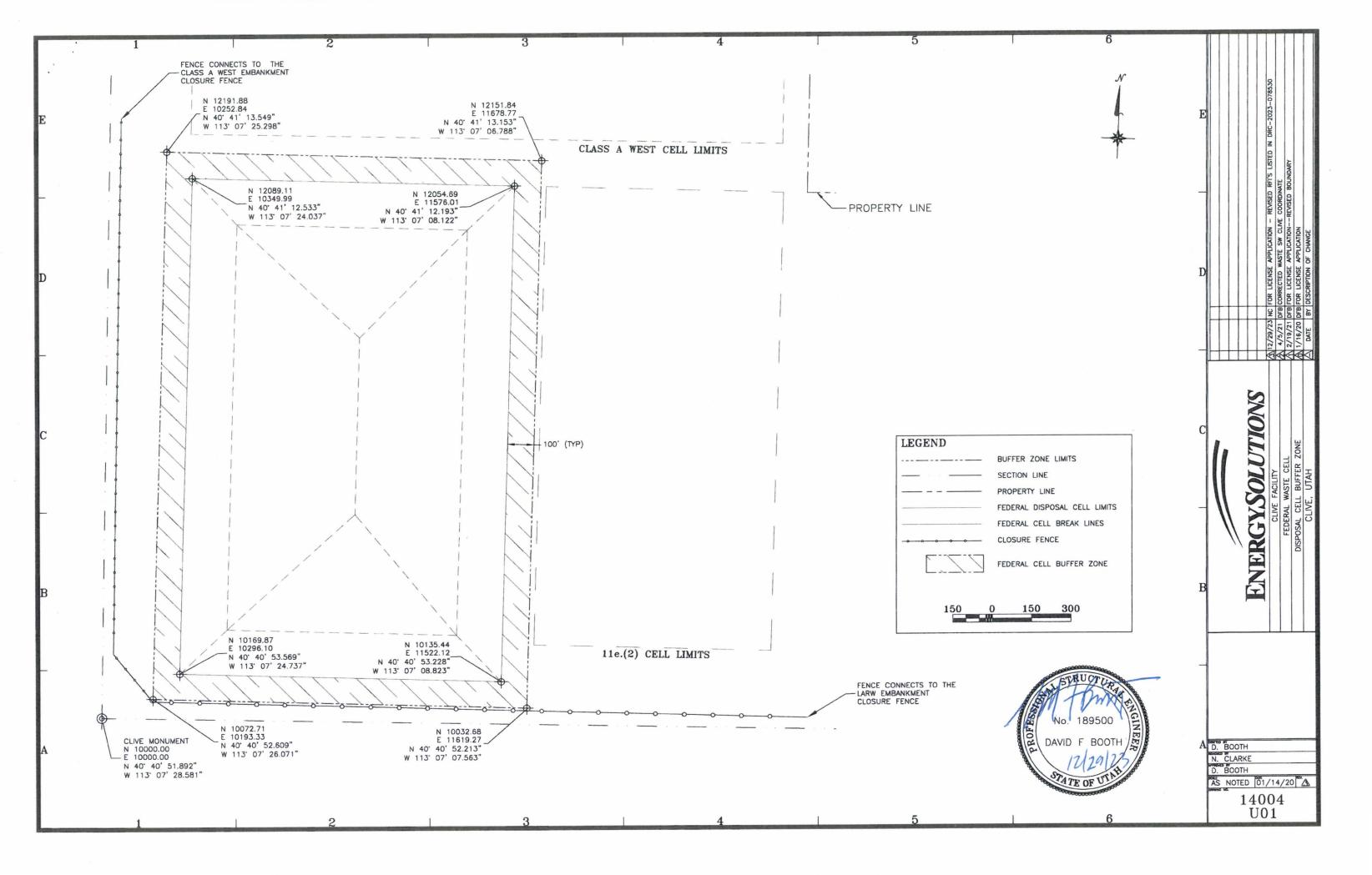


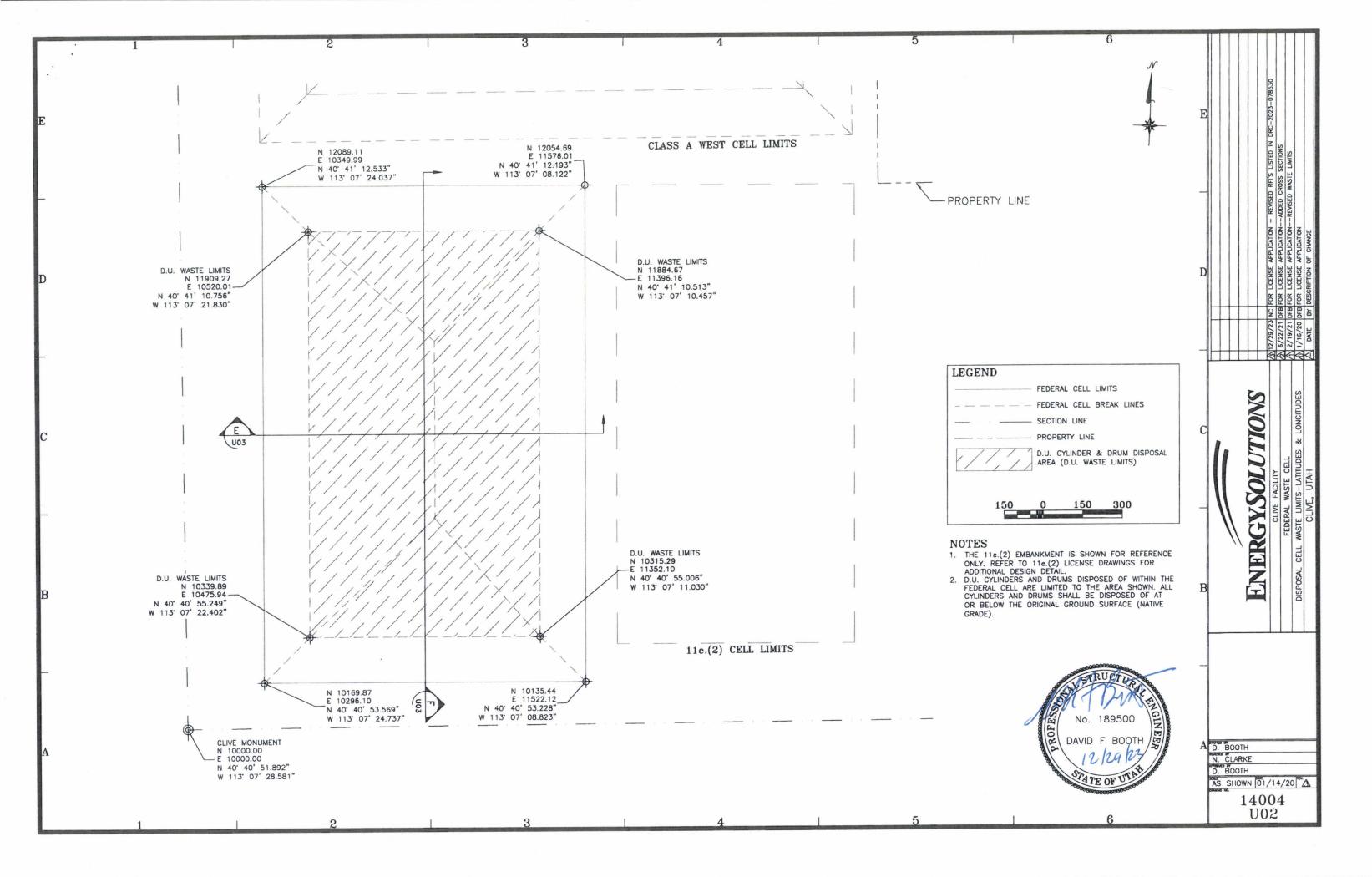


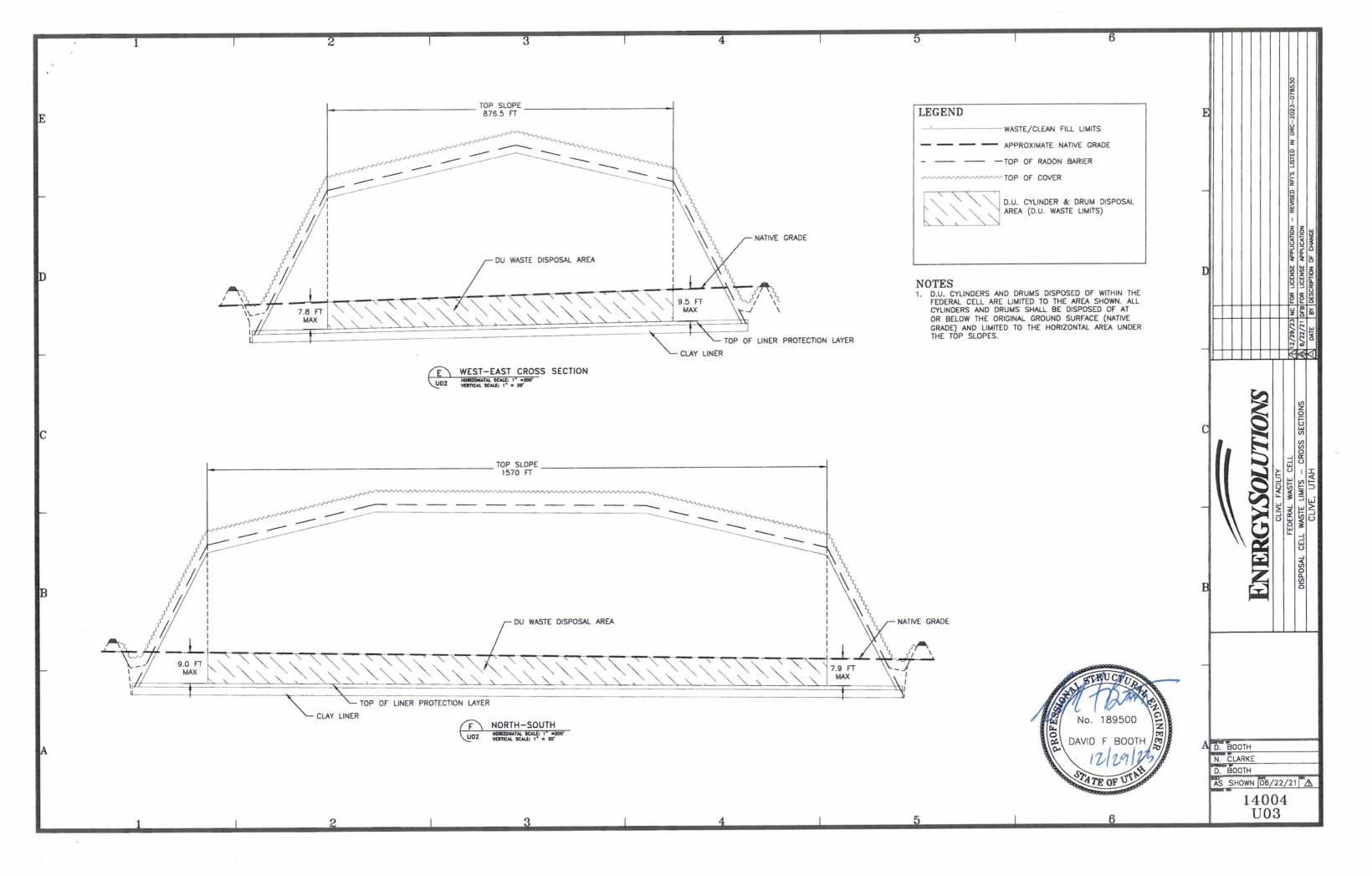


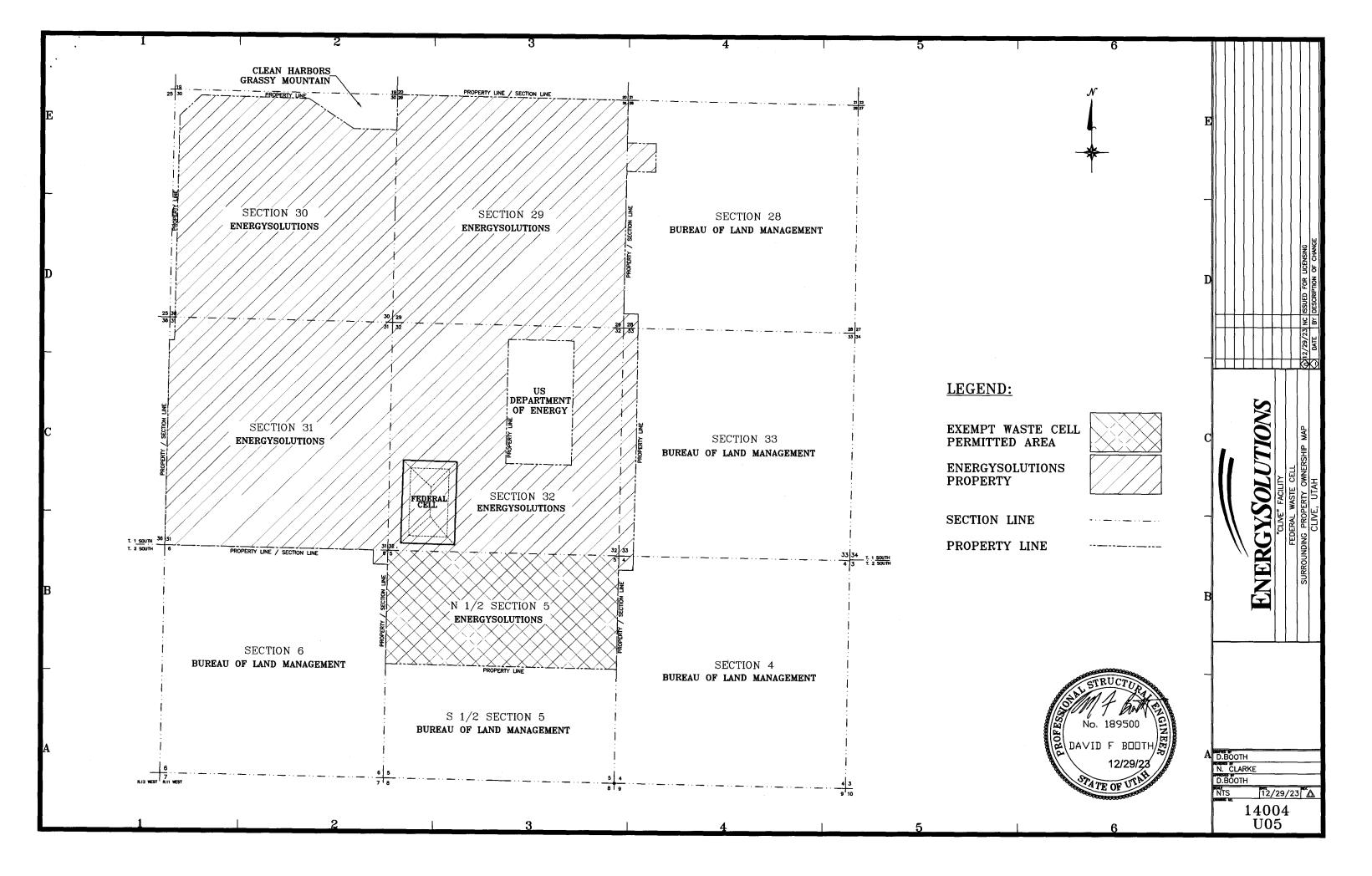


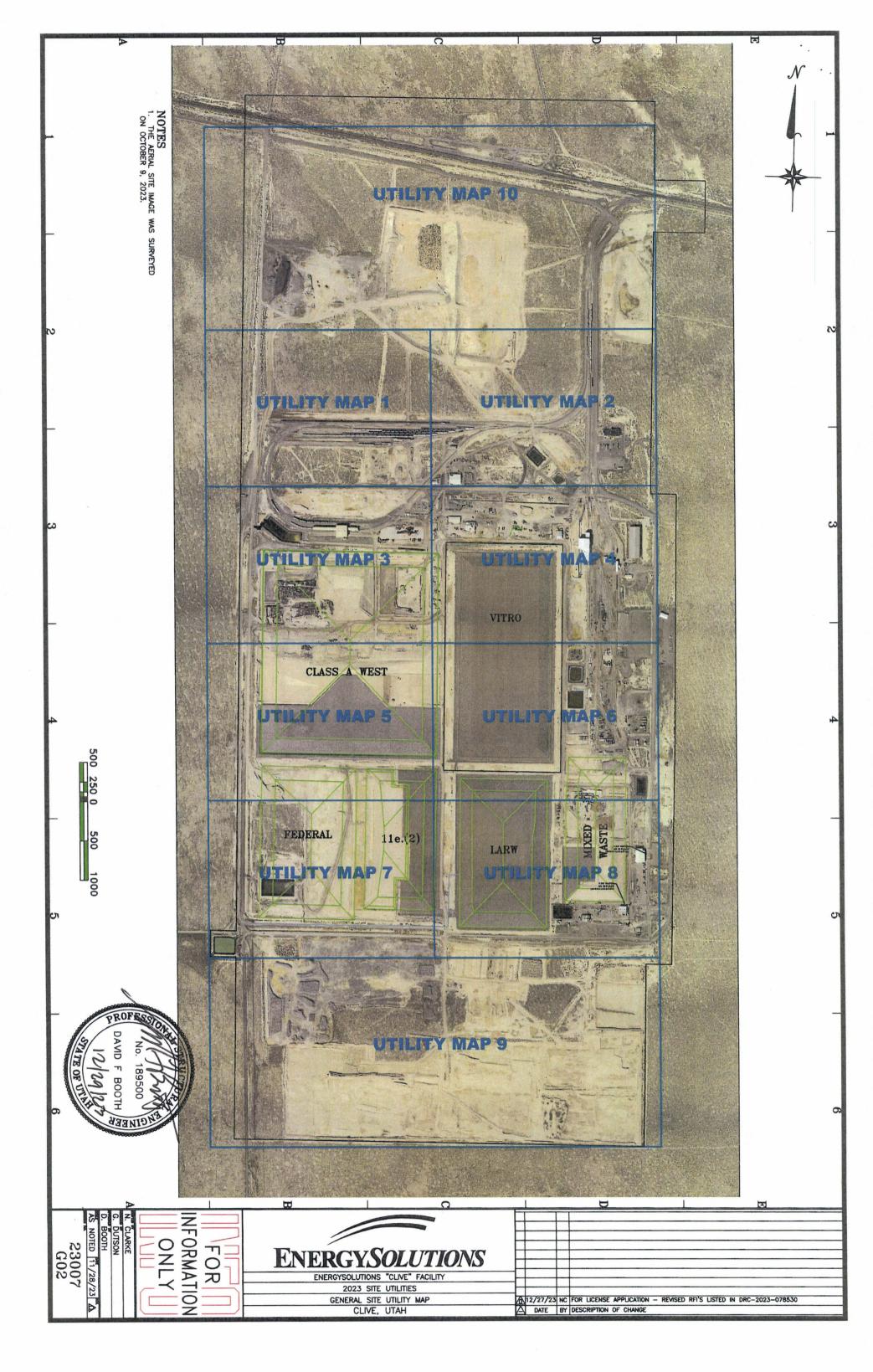




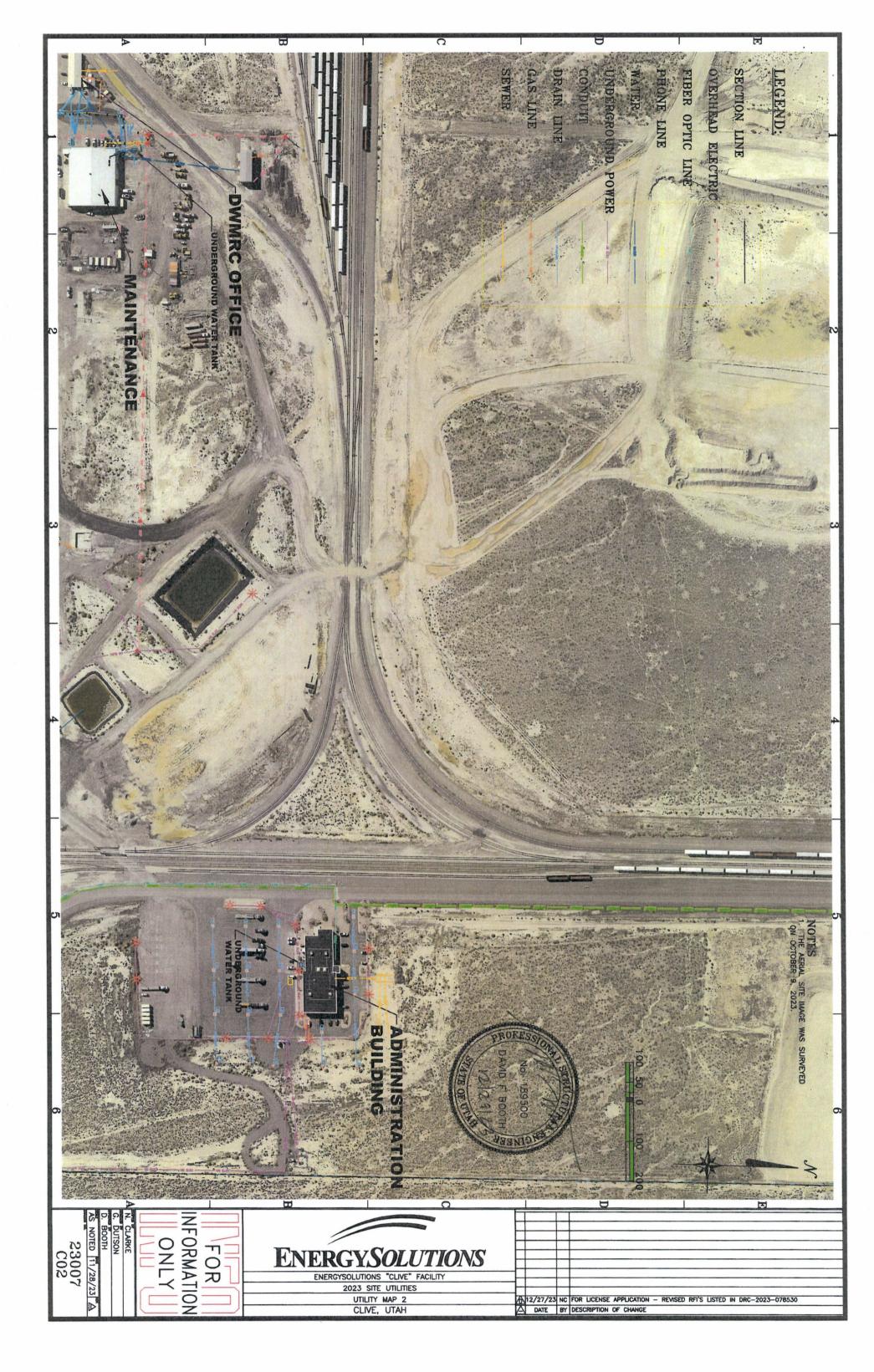


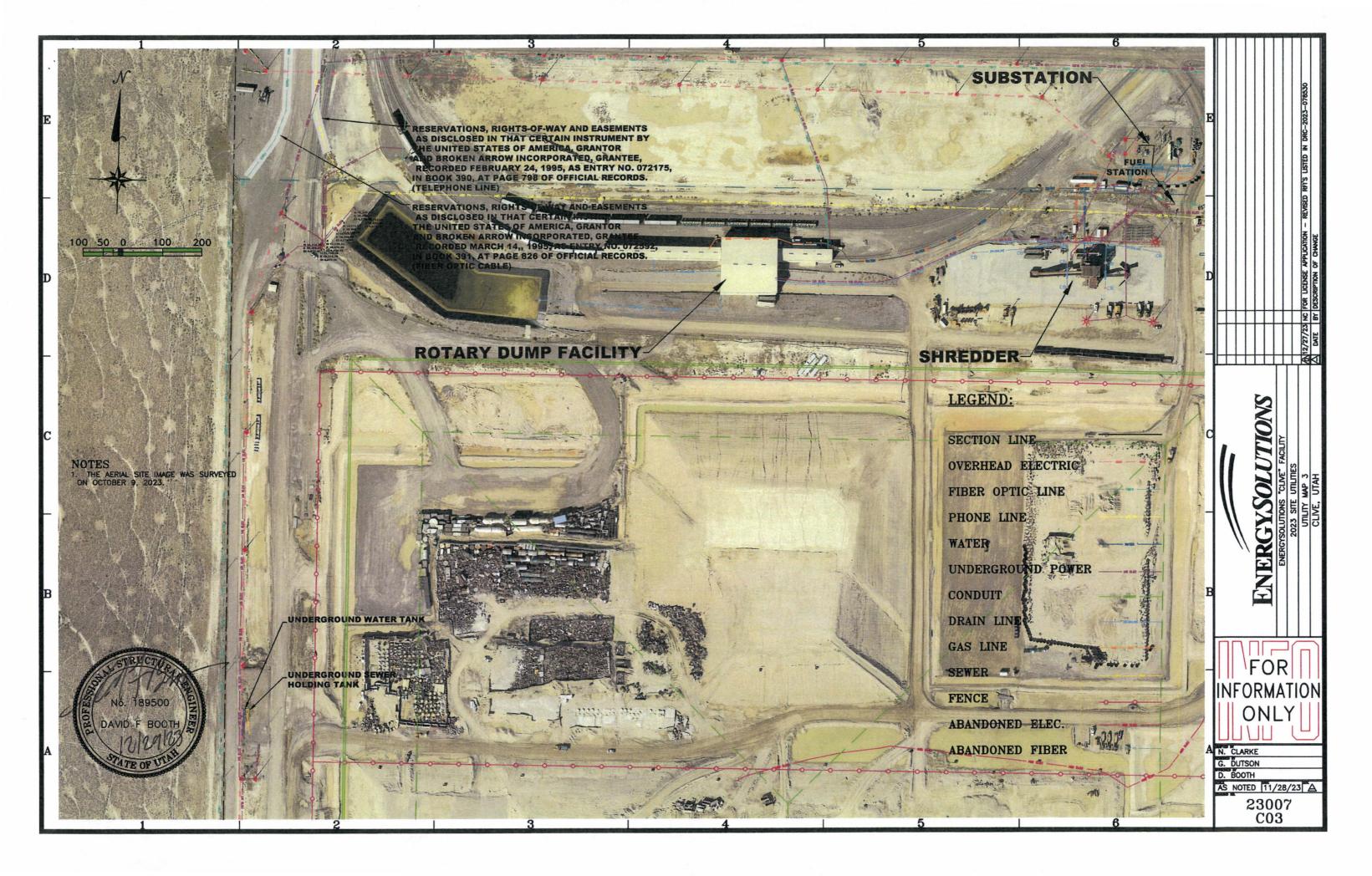


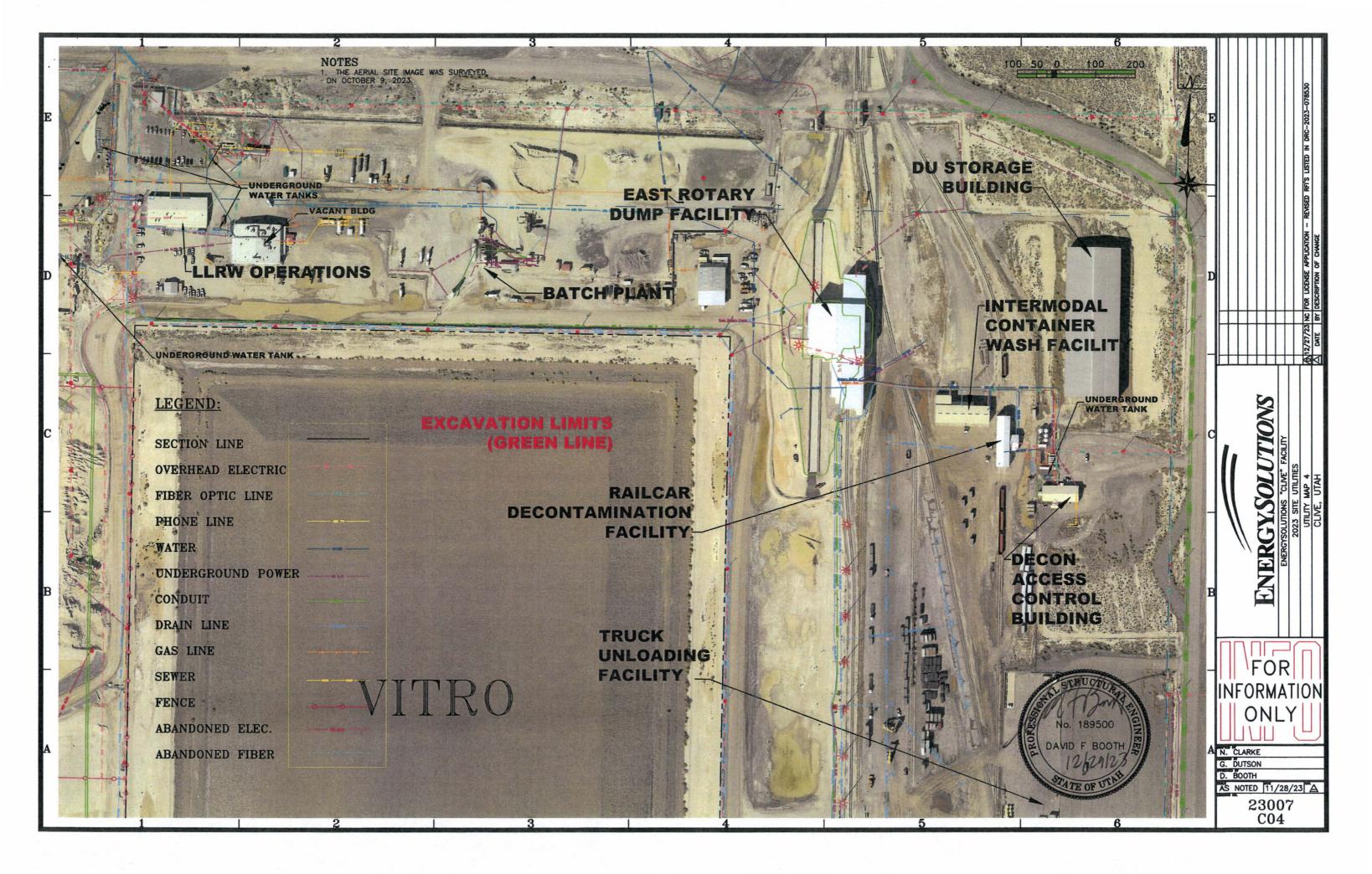


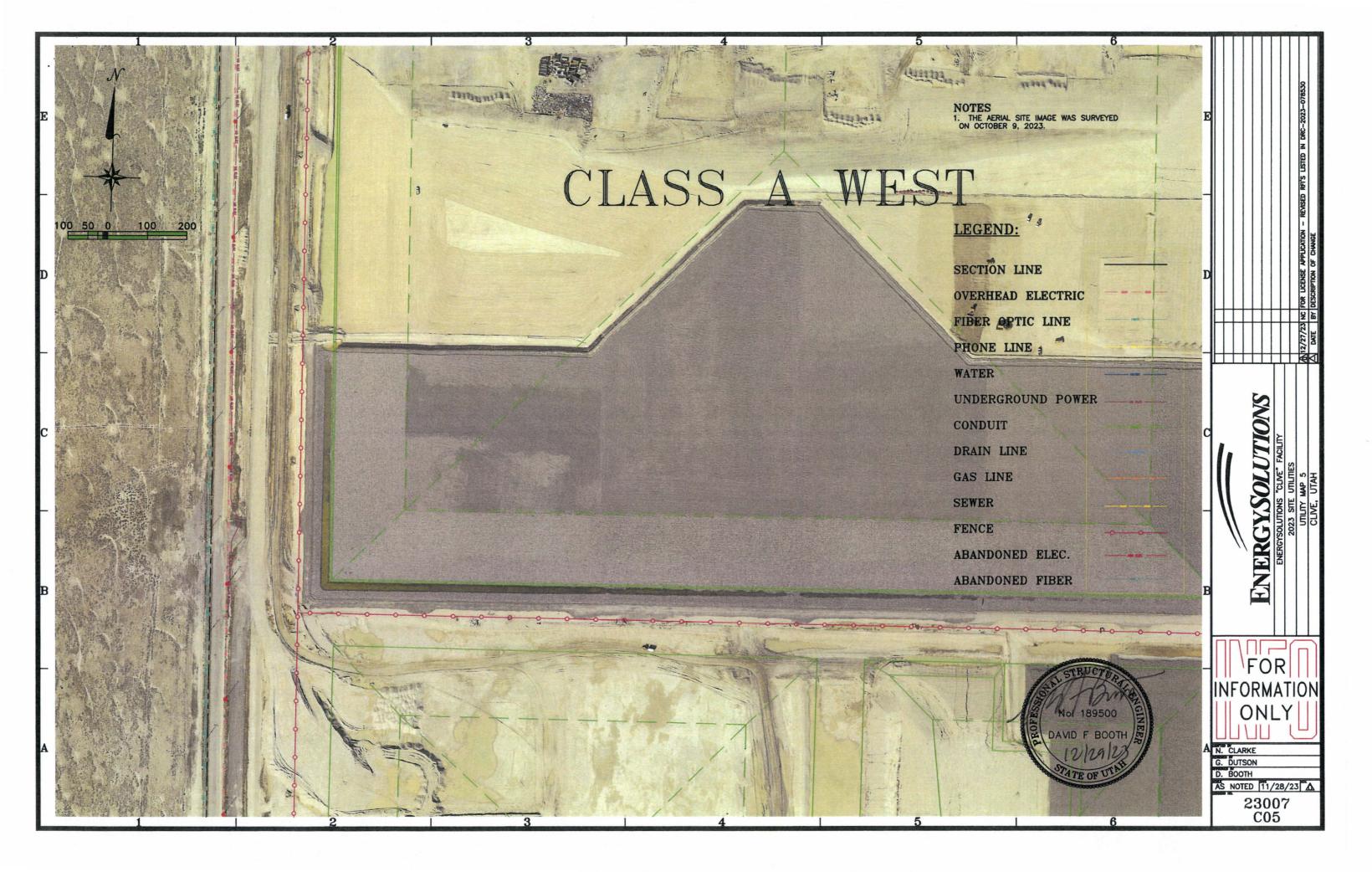


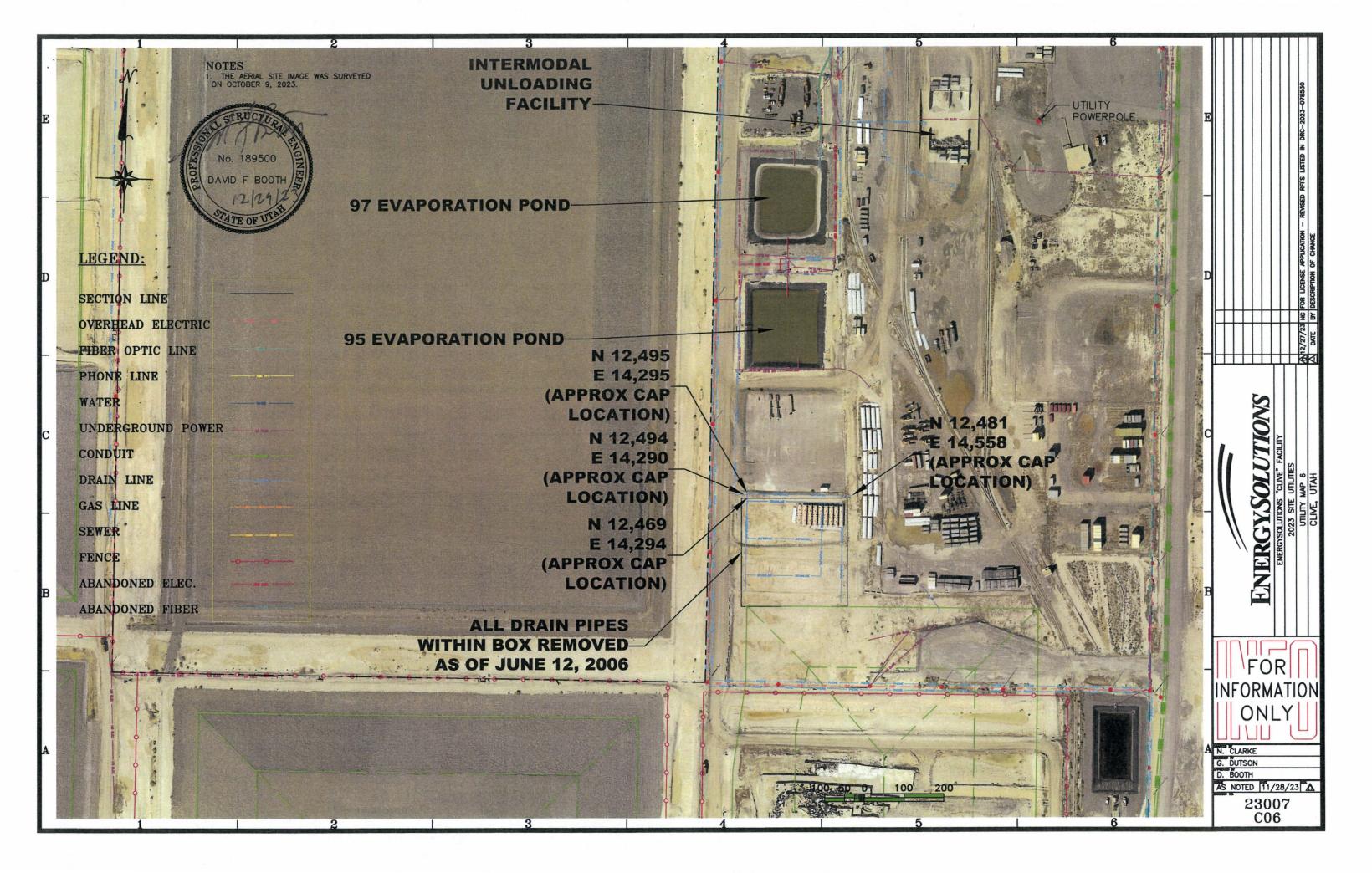


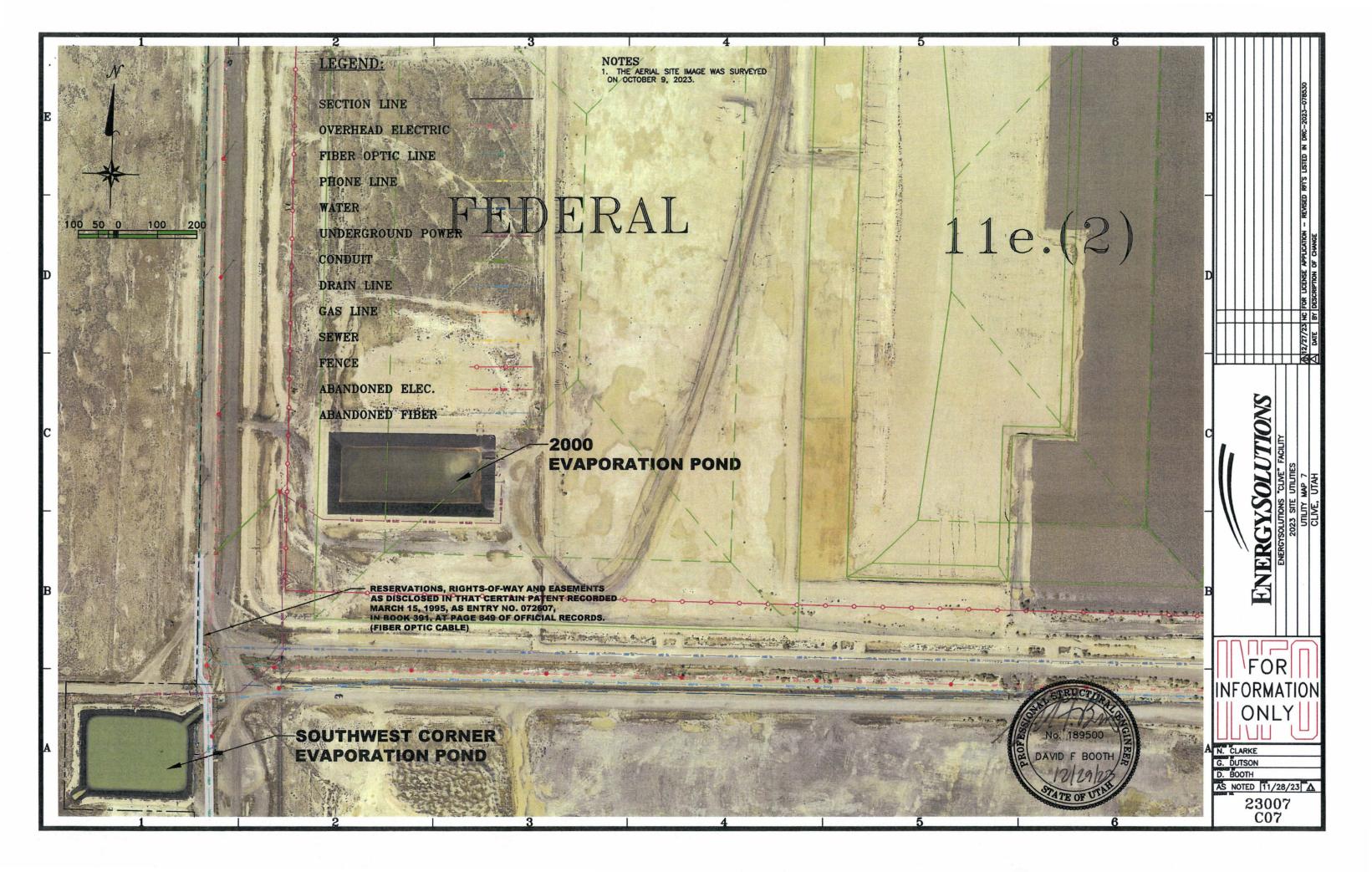


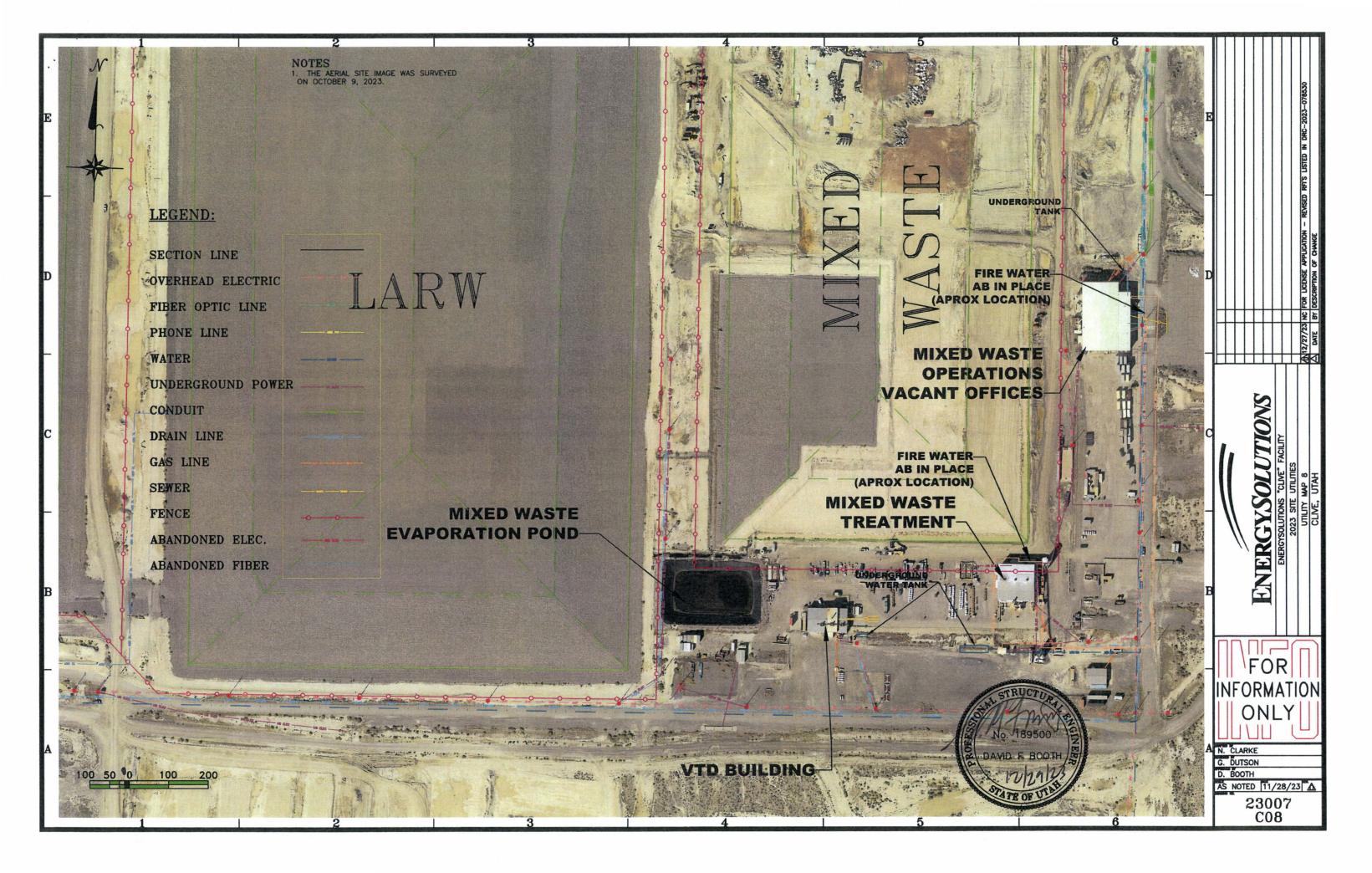


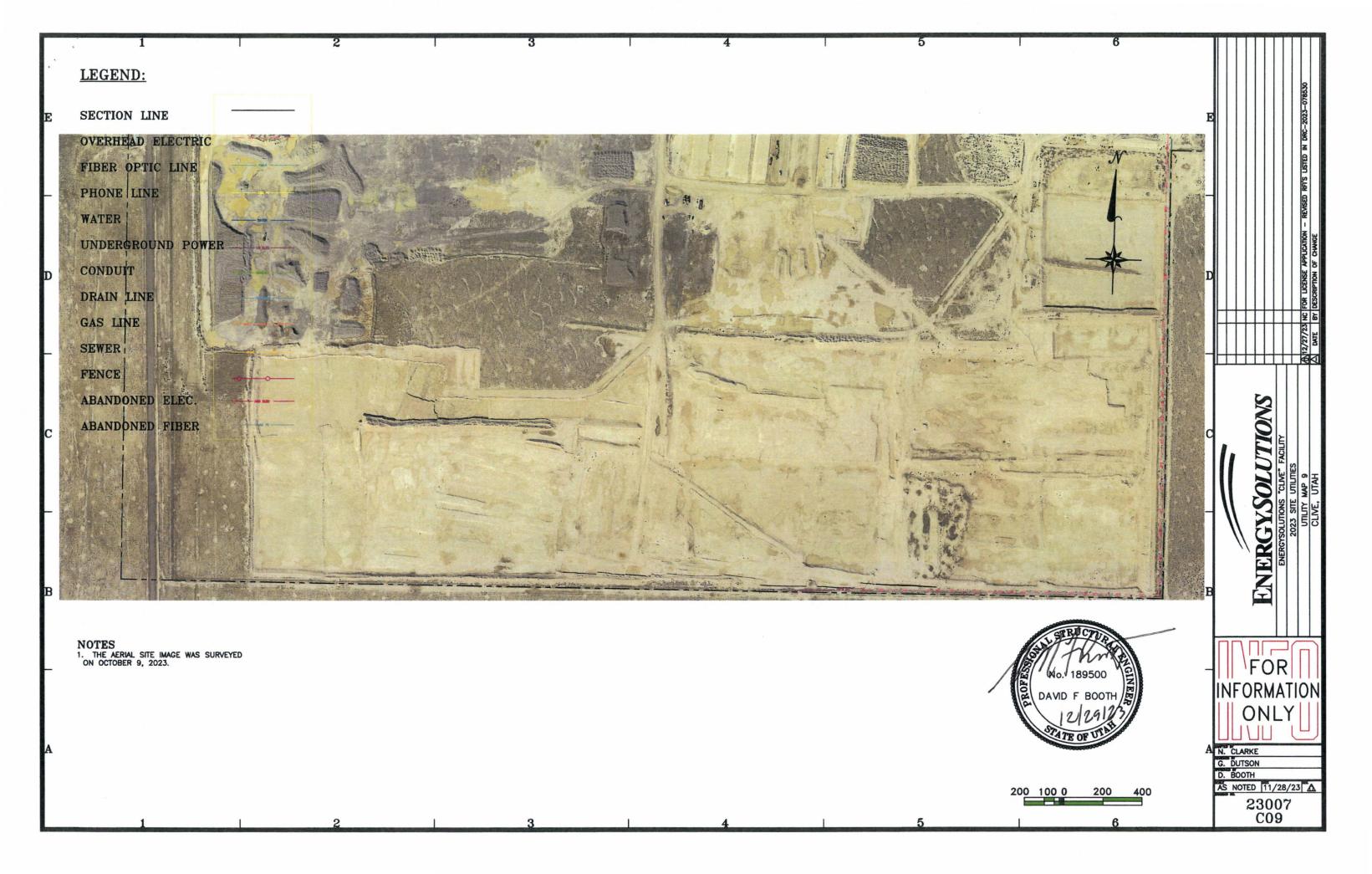


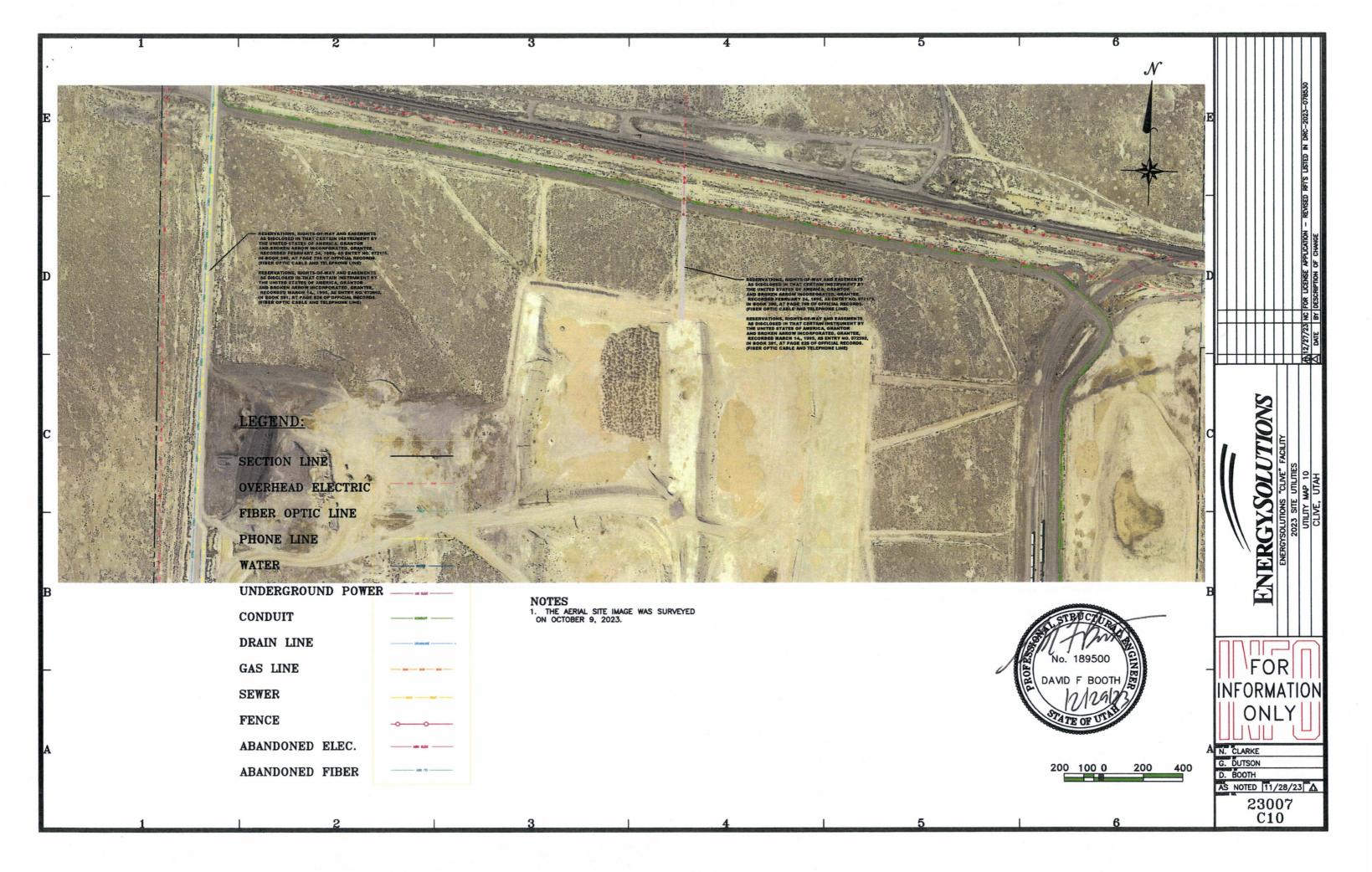


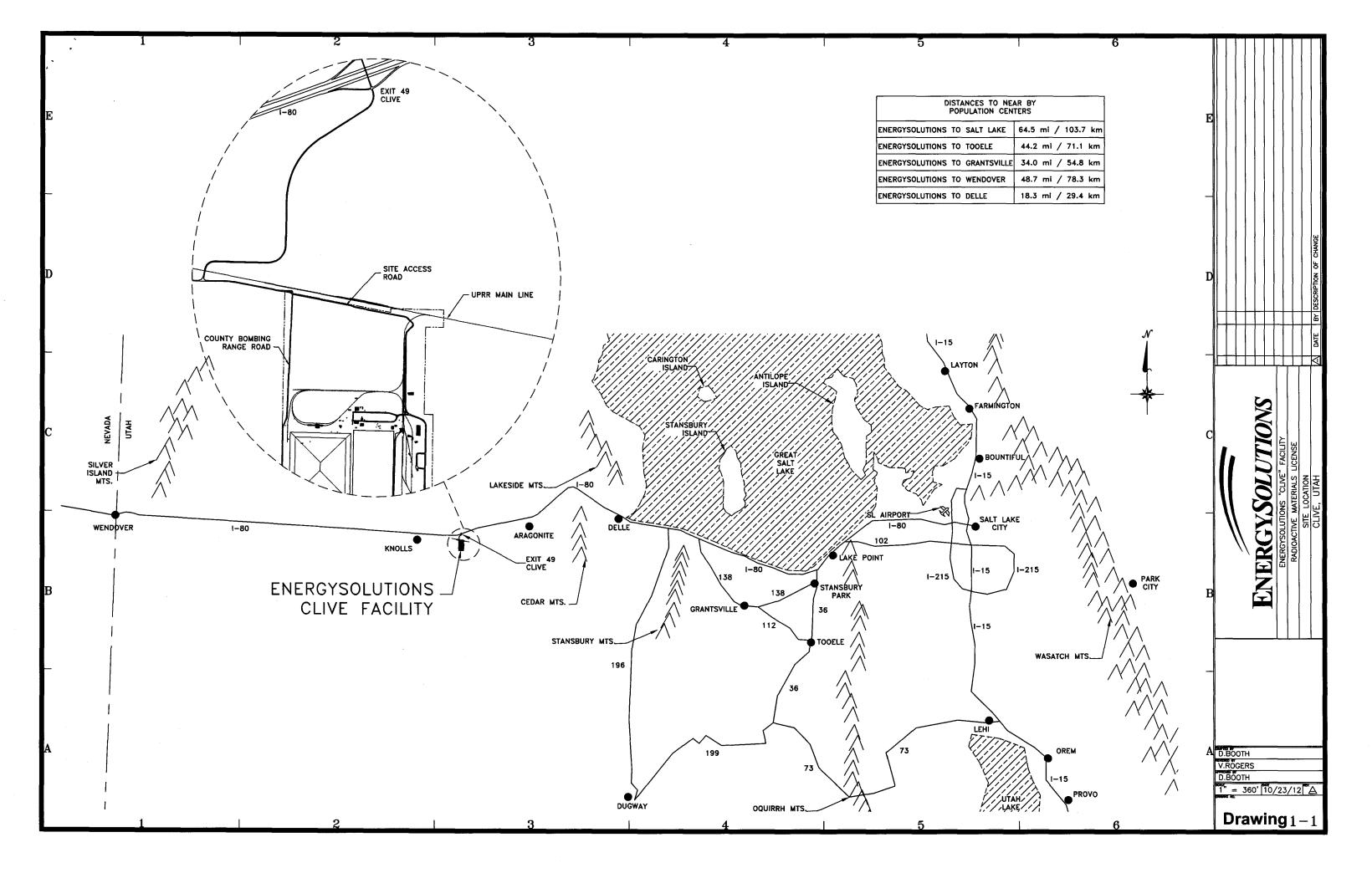












## SURVEYOR'S CERTIFICATE FEDERAL CELL FACILITY SUBDIVISION PLAT LOAVID B DRAPER DO HERESY CERTIFY THAT I AM A PROFESSIONAL IAND SURVEYOR AND THAT I HOLD CERTIFICATE NO. 3881599 IN ACCORDANCE WITH ITTILE SI, CHAPTER 22. PROFESSIONAL ENGINEERS AND PROFESSIONAL LAND SURVEYORS ACT, HAVE COMPLETED A SURVEY OF THE PROPERTIES DESCRIBED ON THIS PLAT IN ACCORDANCE WITH SECTION 17-20-17 AND HAVE EVERIFIED ALL MEASUREMENTS AND HAVE PLACED MOVAMENT AS PREVIOUNDED ON THIS PLAT IN ACCORDANCE WITH SECTION 17-20-17 AND HAVE EVERIFIED ALL MEASUREMENTS AND HAVE PLACED MOVAMENT AS PREVIOUNDED ON THIS PLAT I AND THE AUTHORITY OF THE OWNERS, I HAVE MUCE A SURVEY OF THE TRACT OF LIAND SHOWN ON THIS PLAT AND DESCRIBED HEREOUR AND HAVE SURDANCED SAND TRACT INTO A LOT PREPARATIES TO BE FINDED. OF SECTION 32, TOWNSHIP 1 SOUTH, RANGE 11 WEST, SALT LAKE BASE & MERIDIAN FEDERAL CELL FACILITY SUBDIVISION AND THAT AT THE SAME HAS BEEN CORRECTLY SURVEYED AND MONUMENTED ON THE GROUND AS SHOWN ON THIS PLAT. SUBDIVISION DESCRIPTION A PARCEL OF LAND BEING A PORTION OF THE SOUTHWEST QUARTER OF SECTION 32, TOWNSHIP 1 SOUTH, RANGE 11 WEST, SALT LAKE BASE & MERIDIAN, SAID PARCEL BEING DESCRIBED MORE PARTICULARLY AS FOLLOWS: BEGINNING AT A FOUND 1913 GL.O. BRASS CAP MONLMENT MARKING THE SOUTHWEST COPIER OF SAID SECTION 32, AND RUNNING THENCE NORTH-1704ZE SEST ALONG THE SECTION LINE 2194,25 FEET, THENCE SOUTH BY 2239Y EAST 164,03 FEET, THENCE SOUTH 17952Y WEST 2183,25 FEET TO TH SOUTHLINE OF SAID SECTION 32, THENCE NORTH 87559Y DISTALLAND AS MOUNT SECTION LINE BY SECTION 125. THENCE FOR THE ORDER OF SECTION 32. CONTAINS 3,569,125 SQ, FT, OR 81,936 ACRES (1 LOT) LEGEND APPROVED By Steven J. Dale, P.L.S. at 1:06 pm, Sep 10, 2022 SUBDIVISION BOUNDARY ---- SECTION LINE OWNER'S DEDICATION AND CONSENT TO RECORD KNOWN ALL MEN BY THESE PRESENT THAT THE UNDERSIGNED ARE THE OWNERS OF THE ABOVE DESCRIBED TRACT OF LAND, AND HEREBY CAUSE THE SAME TO BE DIVIDED INTO A LOT AS SET FORTH THE BE HEREAFTER KNOWN AS: FEDERAL CELL FACILITY SUBDIVISION S 88°23'30" E 1640.63' AND DO HEREBY CONSENT TO THE RECORDING OF THIS PLAT IN WITNESS WHEREOF I (WE) HAVE HEREUNTO SET OUR HAND(S) THIS \_\_ SECTION 31 T.1S., R.11W. VICINITY MAP NOTES 1. SUBJECT TO IRREVOCABLE EASEMENT FOR DISPOSAL CAPACITY, ENTRY NO. 346489, ENTRY NO. 481736, ENTRY NO. 485839, ENTRY NO. 517264 AND ENTRY NO. 531762 LOT 1 SW 1/4 SECTION 32 T.15., R.11W. 04-101-A-0004 QUIT CLAIM DEED ENTRY NO. 034941 CORPORATE ACKNOWLEDGMENT SHEET S 88°55'12" E 2641.39' (MEASURED ON THE \_\_\_DAY OF \_\_\_\_A.D. 20 \_\_\_PERSONALLY APPEARED BEFORE ME, THE UNDERSIONED NOTARY PUBLIC IN AND FOR SAID COUNTY OF \_\_\_\_\_N SAID STATE OF UTAR!. \_\_\_\_\_\_WHO AFTER REIND QLV. SWIGHA, ACKNOWLEDGED TO ME THAT \_\_\_\_\_\_\_A UTARL CORPORATION AND THAT \_\_\_\_\_\_\_SKIRCE THE COWNERS DECLATION FREEZ LYND YOULDINARRY FOR AND IN BEHALF OF SAID CORPORATION FOR THE PURPOSES THEREIN MENTIONED AND THAT SAID CORPORATION EXECUTED THE SAME. TOWNSHIP 1 SOUTH ENERGYSOLUTIONS LLC 05-100-D-0001 SPECIAL WARRANTY DEED ENTRY NO. 128249 TOWNSHIP 2 SOUTH OF SPECIAL WARRANTY DEED SECTION 5 T.2S., R.11 W. SECTION 6 T.2S., R.11W. NORTH TOOELE FIRE DISTRICT TOOELE COUNTY TREASURER TOOELE COUNTY PLANNING COMMISSION MCNEIL ENGINEERING Foogonic and Sustainable Designs Perfessionals You Know and Trust FEDERAL CELL FACILITY SUBDIVISION DAY OF\_ APPROVED THIS \_\_\_\_\_\_ DAY OF \_\_\_\_\_\_ BY THE TOOELE COUNTY PLANNING COMMISSION. LOCATED IN THE SOUTHWEST QUARTER OF SECTION 32, TOWNSHIP 1 SOUTH, RANGE 11 WEST, SALT LAKE BASE & MERIDIAN 8610 South Sandy Parkway, Suite 200 Sandy, Utah 84070 901.255.7700 mcneilengineering.com Civil Engineering • Consulting & Landscape Architect Structural Engineering • Land Surveying & HDS TOOELE COUNTY TREASURER CHAIRMAN, TOOELE COUNTY PLANNING COMMISSION TOOELE COUNTY ENGINEER TOOELE COUNTY HEALTH DEPARTMENT TOOELE COUNTY ATTORNEY COUNTY SURVEY DEPARTMENT TOOELE COUNTY RECORDER I HEREBY CERTIFY THAT I HAVE HAD THIS PLAT EXAMINED BY THIS OFFICE AND IT IS CORRECT AND IN ACCORDANCE WITH INFORMATION ON FILE AND IS HEREBY APPROVED. APPROVED THIS \_\_\_\_\_\_\_ DAY OF \_\_\_\_\_\_\_\_ A.D., 20\_\_\_\_ APPROVED AS TO FORM THIS \_\_\_\_\_\_ DAY OF \_\_\_\_\_\_ A.D., 20\_\_\_\_ RECORD OF SURVEY FILE #0022-0042 STATE OF UTAH, COUNTY OF TOOELE, RECORDED AND FILED AT THE REQUEST OF \_\_\_\_ TOOELE COUNTY HEALTH DEPARTMENT TOOELE COUNTY SURVEY DEPT. DIRECTOR COUNTY ENGINEER