



Westinghouse Electric Company LLC  
Nuclear Fuel  
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U.S. Nuclear Regulatory Commission	Our ref: HEM-13-21
Washington, DC 20555-0001	Date: February 28, 2013

Subject: Hematite Decommissioning Project: Change in Project Director - Mr. Joe Smetanka as Managing Director and Mr. Dennis Richardson as Deputy Director (License No. SNM-00033, Docket No. 070-00036)

- References:
- 1) Hematite License No. SNM-33, Amendment 59, as approved by NRC (McConnell) Letter to Westinghouse (Hackmann) dated November 9, 2011, "Approval Of Westinghouse Hematite Physical Security Plan, Dated July 28, 2011, Category I Contingency Safeguards Contingency Response and Contingency Security Training And Qualification Plans, Dated July 28, 2011, and Fundamental Nuclear Material Control Plan Dated February 18, 2011; and Issuance of Hematite Amendment 59 (SNM-33)"
  - 2) NRC (Habighorst) letter dated January 9, 2010, "Acceptance of Proposed Reviewing Officials for Order Imposing Fingerprinting and Criminal History Records Check Requirements for Access to Safeguards Information"
  - 3) Westinghouse (Smetanka) letter HEM-12-31, dated March 26, 2012, "Request for Approval of a Reviewing Official for Access to Safeguards Information for the Westinghouse Hematite Decommissioning Project"

License Condition 16 of Hematite License No. SNM-33 (Reference 1) incorporates by reference the Decommissioning Plan (DP) for the Hematite Decommissioning Project (HDP), and the resolutions to requests for additional information (RAIs) received from the U.S. Nuclear Regulatory Commission (NRC). Section 9.3 of the DP requires HDP to submit a notification to NRC within 30 days of a change to the individual designated as the Project Director or the Radiation Safety Officer. The notification shall include a summary of the new individual's experience, qualifications, and an evaluation verifying the minimum requirements for the position are met.

As of February 21, 2013, Westinghouse Electric Company LLC (Westinghouse) assigned me to the position of Managing Director for HDP. In addition, Westinghouse has appointed Mr. Dennis Richardson as Deputy Director for HDP. Both of us will have roles that are part of the Project Director position described in DP Section 9.3. In general, I will direct the financial aspects of the project and Mr. Richardson will direct the day to day operations of the project,

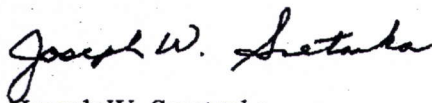
described in the DP, including all safety, regulatory, and remediation aspects of the project. Mr. Richardson will assist me with directing the day to day operations of the project, including safety and regulatory compliance aspects of the project. Both the Managing Director and the Deputy Director have the responsibility and accountability to enforce nuclear safety and compliance with regulatory requirements of the project. Signature by either the Managing Director or Deputy Director fulfills the review and approval authority of the Project Director as described in the DP.

Attachment 1 contains a summary of my experience and qualifications, and Attachment 2 contains the evaluation verifying that my experience and qualification meet the minimum requirements for the Project Director. Attachment 3 contains a summary of Mr. Richardson's experience and qualifications, and Attachment 4 contains the evaluation verifying that his experience and qualification meet the minimum requirements for the Project Director.

Reference 2 approved a named person as a Westinghouse Reviewing Official for access to Safeguards Information. Reference 3 identified the same person as a backup to the primary Reviewing Official for HDP. This backup person will now be the primary Reviewing Official for HDP.

Please contact me at 412-374-3966, or Dennis Richardson at 314-810-3376, should you have questions or need additional information.

Sincerely,



Joseph W. Smetanka  
Managing Director, Hematite Decommissioning Project

- Attachments:
- 1 Resume of Joseph Smetanka
  - 2) Evaluation of Experience and Qualifications of Joseph Smetanka to Satisfy Hematite License Requirements for Project Director
  - 3) Resume of Dennis Richardson
  - 2) Evaluation of Experience and Qualifications of Dennis Richardson to Satisfy Hematite License Requirements for Project Director

cc w/Attachments:

J. J. Hayes, NRC/FSME/DWMEP/DURLD  
M. M. LaFranzo, NRC Region III/DNMS/MCID  
J. M. Tapp, NRC Region III/DNMS/MCID

**ATTACHMENT 1**

**Resume of Joseph Smetanka**

**Westinghouse Electric Company LLC, Hematite Decommissioning Project**

**Docket No. 070-00036**



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**JOSEPH W. SMETANKA**

**SUMMARY**

Senior management executive with experience in diverse business segments requiring strategic planning, operational knowledge, customer satisfaction, and financial management skills. Demonstrated ability to lead, plan, organize, and communicate with teams to achieve significant financial and service levels.

**PROFESSIONAL EXPERIENCE**

**Westinghouse Electric Company, Cranberry PA**

**2009-Present**

Global provider of nuclear engineering & construction services.

**Vice President, Operations Support, Nuclear Fuel**

Responsible for leading best in class operating excellence within the asset management & investment planning, production & manufacturing planning, supply chain, environmental health & safety, quality & customer satisfaction, and continuous improvement processes for the nuclear fuel manufacturing business.

- Reduced annual capital investment by 50 percent (\$200M to \$100M)
- Increased manufacturing operating profit by 50 percent (\$75M to \$110M)
- Reduced Industrial Safety Accidents and Total Recordable Incident rates by 30 percent
- Implemented new manufacturing strategy, inventory management, quality, customer satisfaction, business continuity, and performance management processes.
- Negotiated long term outstanding legal settlement with prior owners of former nuclear fuel manufacturing site resulting in significant positive financial results for both Westinghouse and Toshiba.

**Crown Castle International, Canonsburg PA**

**2007-2009**

Cell tower owner providing service to 25,000 sites and wireless carriers across the United States

**Vice President\Director, Operations**

Responsible for the operations and maintenance requirements for cell towers, antenna systems, and the operations center. Included the management and strategic oversight for the supply chain, fleet, contractor, safety, and administrative operation functions of the company. Direct workforce responsibility for 30 personnel and \$5M annual budget; indirect responsibility for 150 field technicians and \$50M repair and maintenance budget.

- Developed 3 year strategic plan for the operations organization.
- Developed processes to achieve 10 percent annual cost savings, and increased customer service levels by 10 percent.
- Developed complimentary business model to position the organization for future strategic growth.



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- Incident & Disaster Commander responsible for developing critical operating plans and increasing awareness & responsiveness for the entire organization.
  - Leadership role on the Personal Communications Industry Association's Operations Committee to the wireless cellular industry.

**Duquesne Light Company, Pittsburgh PA**

**1982-2007**

Electric utility serving 585,000 customers in Allegheny and Beaver County

**Vice President, Operations & Customer Services**

**2005-2007**

Executive leadership and strategist reporting to the Chief Operating Officer (COO) for Customer Services (call center, billing and collections/payments, metering) and for Operations Services (supply chain, fleet maintenance, contractor, safety, and administrative operations) of the company. Workforce responsibility of 600 personnel and \$100M annual budget.

- Increased the overall customer satisfaction of the organization to all time levels.
- Responsible for developing the 3 year 'Operational Excellence' strategic plan for operations and customer services by identifying best practices and benchmarks to enable the organization to become top decile in key operating performance among electric utilities.
- Led initiative to develop the workforce plans to restructure the work, skills, education, and replenishment requirements for all operations and customer services positions.
- Assisted evaluating merger and acquisition opportunities for the holdings company.
- Implemented inventory improvement processes and controls to reduce inventory levels by 30 percent and increase inventory turnover by 2.0.
- Reduced accounts receivables arrearages by 50 percent from year 2000 levels.

**General Manager, Operations Services**

**2003-2005**

Responsible for directing 300 personnel and \$50M annual budget to provide financial and operations support in telecommunications, fleet management, supply chain, property management, and metering and billing.

- Restructured the fleet maintenance operations to standardize the specifications for new vehicle purchases resulting in 30 percent cost savings. Initiated a new business opportunity for non-company fleet maintenance services resulting in annual revenues of \$1M and profit margins of 30 percent.
- Implemented new internal telecommunications procedures to increase revenue and minimize business risk due to telecommunication providers' ability to utilize company pole and duct assets for data and communications access.
- Implemented facility master plan to determine optimal logistics of service centers, including which buildings to sell, retire/replace, or build new.

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- Negotiated labor agreement to perform meter reading in-house at market rates, and vendor service agreement to improve accuracy of meter reads and bills to highest levels in the industry.

**General Manager, Technical & Business Services**

**2000-2002**

Responsible for directing 100 engineering personnel designing \$50M annually of electrical construction projects. Additional responsibilities included developing and implementation of the \$200M corporate budget, and the administrative and training support requirements for all 1200 company personnel.

- Assisted the President to fundamentally redesign the organization, processes, and technology from a regulated to a competitive delivery company. Reduced total company expenditures by 40 percent while increasing service levels.
- Developed and implemented the asset management process to identify capital asset investments and maintenance and operations work required for the \$1.5B of assets.
- Restructured the engineering organization by 30 percent, while completing all projects required in the annual work plan.
- Developed and implemented a corporate management development training program.

**Prior Career Progression Positions at Duquesne Light Company:**

**1982-1999**

Manager, Maintenance Processes  
Manager, Business Solutions  
Senior Financial Consultant, Corporate Finance  
Project Manager, Special Projects Initiatives  
Director Project Management, Operations  
Supervisor Financial Accounting, Corporate Finance  
Planning & Scheduling Engineer, Fossil Generation  
Construction Supervisor, General & Administrative  
Structural Engineer, Nuclear Generation

**EDUCATION**

MBA	University of Pittsburgh, Finance	1988
BS	University of Pittsburgh, Civil-Structural Engineering	1982
	Leadership Pittsburgh – Class XXVI Graduate	2010

**LICENSES**

Professional Engineer, PA	Real Estate Salesperson, PA
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**BOARD AFFILIATIONS**

Electric League-Western PA	Pittsburgh Voyager–RiverQuest
Dance Alloy Theatre	

**OTHER**

Tollgrade – Business consultant to develop SmartGrid product line	2007-2008
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**ATTACHMENT 2**

**Evaluation of Experience and Qualifications of Joseph Smetanka to  
Satisfy Hematite License Requirements for Project Director**

**Westinghouse Electric Company LLC, Hematite Decommissioning Project**

**Docket No. 070-00036**



Evaluation of Experience and Qualifications of Joseph Smetanka to  
Satisfy Hematite License Requirements for Project Director

I. Introduction

This evaluation compares the experience and qualifications of Joseph Smetanka to the experience and qualification requirements for the Project Director specified in Hematite License No. SNM-33. The content of Mr. Smetanka's resume was the primary source used to ascertain his experience and qualifications. Based on the evaluation below, it is determined that Mr. Smetanka's experience and qualifications meet or exceed the requirements of Hematite License No. SNM-33 that are applicable to the Project Director. A copy of his resume is provided as an Attachment 1 to this letter.

II. License Experience and Qualifications Requirements for Project Director

License Condition 16 of Hematite License No. SNM-33 incorporates by reference Section 9.3.1 of the Decommissioning Plan. Section 9.3.1 states:

“At a minimum the Project Director will meet the following qualifications:

- Bachelor's degree in an appropriate discipline or an equivalent combination of education and experience;
- Previous managerial experience in project management of large complex projects; and
- Training in nuclear safety.”

III. Evaluation of Experience and Qualifications to License Requirements for Project Director

- *Bachelor's degree in an appropriate discipline or an equivalent combination of education and experience*

Based on the attached resume, Mr. Smetanka holds a Bachelor of Science Degree in Civil-Structural Engineering from the University of Pittsburgh and over 15 years of experience in the nuclear industry. Therefore, this license requirement is satisfied.

- *Previous managerial experience in project management of large complex projects;*

The attached resume indicates that Mr. Smetanka has 12 years of managerial and supervisory experience in large complex projects involving nuclear and cellular technology. This experience includes operations services for a nuclear electrical power plant and operation support for nuclear fuel manufacturing. He has been directly responsible at Westinghouse Corporate for the Hematite Decommissioning Project for the past three years. Therefore, this license requirement is satisfied.

- *Training in nuclear safety*

As indicated in his resume, Mr. Smetanka has been responsible for programs related to nuclear power and nuclear fuel manufacturing for over 15 years. He has received nuclear safety training commensurate with those responsibilities. Therefore, this license requirement is satisfied.

#### IV. Conclusion

Based on the evaluation documented above, it is determined that Mr. Smetanka's experience and qualifications meet or exceed the requirements for the Project Director specified in Section 9.3.1 of the Decommissioning Plan, and incorporated into the Hematite license.

**ATTACHMENT 3**

**Resume of Dennis Richardson**

**Westinghouse Electric Company LLC, Hematite Decommissioning Project**

**Docket No. 070-00036**



## **DENNIS RICHARDSON**

### **EDUCATION**

MBA University of Pittsburgh

MS in Mathematics, California State University, San Diego

MS in Mechanical Engineering, Penn State University

BS in Aerospace Engineering, Penn State University

### **SUMMARY OF QUALIFICATIONS**

- 40 years Nuclear Electric Power.
- Engineer for the digital replacement Reactor Protection System/Engineered Safeguards System at Duke Oconee Units 1, 2, 3.
- Verification and Validation (V&V) Engineer for the Triconex digital system nuclear applications.
- Licensing and Safety Manager for all nuclear facilities at the Hanford Site.
- Licensing and Safety Manager responsible for all nuclear facilities at the Savannah River production site (Aiken, SC) including the K reactor. Also was prime interface with the U.S. Nuclear Regulatory Commission (NRC) and U.S. Department of Energy (DOE) and state authorities for negotiating and meeting safety and environmental requirements.
- Managed the corrective action program to define and resolve all open issues (regulatory, safety and design bases issues) on K reactor and developed risk based prioritization method that was approved by NRC for identifying restart issues.
- Managed 30 Final Safety Analysis Report (FSAR) projects for Westinghouse commercial nuclear projects. This included participating in the review and licensing proceedings with regulating authorities and customers.
- Led licensing review with NRC for Westinghouse analysis codes, design bases, safety limit calculations, improved technical specification development, and risk assessment technology.
- Technical Director managing over twenty full Level 3 Probabilistic Risk Assessments for both U.S. and non-U.S nuclear plants. Also served as chief licensing witness for many plants worldwide including England (Sizewell B), Belgium, Italy (PUN), Japan and Taiwan.
- Led 10CFR50.59 developments and reviews for consideration of a large variety of proposed physical and procedural changes at operating plants. This included upgrading program and implementing guidance of NEI 96-07 and NRC 9900 Inspection Manual for 10CFR50.59.
- Licensing Manager at Beaver Valley Nuclear Plants (BVNP) including specification submittals, 10CFR50.59 reports, Unified FSAR Verification Project, verification of FSAR versus all design bases as defined in 10CFR 50.2, and implementation of guidance in NEI 97-04.
- Developed risk based Justification of Continued Operation (JCOs) for variety of operating issues at commercial and production reactors.

- Participated on top level Westinghouse safety/licensing review committee in support of the Westinghouse commercial power plant owners group (WOG).
- Directed 10CFR50.54f (design and licensing bases integration/resolution) and 10CFR50.59 (change control and Un-reviewed Safety Question [USQ] determination) activities for variety of sites including D.C. Cook units, Beaver Valley units, and Crystal River Nuclear Plant.

## **EXPERIENCE – CHRONOLOGICAL**

### **2/13 to current – Deputy Director, Westinghouse Hematite Decommissioning Project**

Directs the day to day operations of the project, including safety and regulatory compliance aspects of the project.

### **7/12 to 2/13 – Licensing Manager, Westinghouse Hematite Decommissioning Project**

Responsible for all NRC licensing submittals and compliance activities for the Westinghouse Hematite Decommissioning Project. In January 2013 added responsibilities for regulatory submittals and compliance activities with the Missouri Department of Natural Resources for remediation and control of non-radiological constituents of concern.

### **8/10 to 7/12 - Retirement**

### **7/07 to 8/10- RPS/ES Engineer for the Duke Oconee Nuclear Units 1, 2 & 3**

Responsible for the review and approval of various vendor documents for the RPS/ES digital replacement of the Bailey control and protection systems. This included review of all V&V activities including the factory acceptance testing (FAT) procedures and FAT testing for the replacement systems. Also, the primary reviewer and process developer for the Requirements Traceability Matrix (hardware and software).

### **8/06 to 7/07 - Retirement**

### **7/05 to 8/06 – Senior Technical Consultant for Invensys/Triconex Co. Nuclear Integration Quality Assurance and Product Application V&V**

### **2/01 to 7/05 Manager Pre-closure Safety Analysis Dept – Bechtel/SAIC**

Responsible for establishment and implementation of all programs to determine the risk informed pre-closure safety and design during all operational phases of the Yucca Mountain project. This includes determining safety related design bases and quality assurance classification for all Important to Safety (ITS) systems, components and structures and certification of the processes and methodology with the NRC to meet the regulatory criterion.

### **12/99 to 2/01 – Manager Repository Safety Yucca Mountain Project SAIC**

Regulatory & Licensing- Responsible for the planning, strategy, and guidance on essential elements of licensing the Repository, setting the Safety Strategy and defining regulatory requirements for the design and performance assessment safety cases. Also responsible for key regulatory interaction with the NRC and interfacing with the major review groups (Nuclear Waste Technical Review Board [NWTRB], Advisory Committee on Nuclear Waste and Materials [ACNW], Total System Performance Assessment [TSPA] peer review and State of



Nevada). Scope included defining interpretations of draft 10CFR63 and prescribing key regulatory design bases for the repository surface and sub-surface design.

**8/99 to 12/99 – Senior Consultant for American Electric Power**

Responsible for D.C. Cook Nuclear Units 1 & 2 restart program involving the safety evaluation of all design, procedural and program changes. This involved establishing the process, qualification and implementation of the 10CFR50.59 program for the site and review with the NRC for gaining restart credentials.

**7/98 to 8/99 – Manager Repository Safety, Yucca Mountain Nuclear Waste Project**

Responsible for the planning, strategy, and guidance on essential elements of licensing the Repository, setting the Safety Strategy and defining regulatory requirements for the design and performance assessment safety cases. Also responsible for key regulatory interaction with the NRC and interfacing with the major review groups (NWTRB, ACNW, TSPA peer review and State of Nevada).

**1/98 to 7/98 - Licensing Manager, Beaver Valley Nuclear Plants BVPS-1 and BVPS-2**

Performed revisions and verification of FSAR and Design Bases per 10CFR50.2 using guidance of NEI 97-04 in resolving 10CFR50.54 issues. Also prepared Technical Specification submittals and full review for Standard Technical Specification applicability to both units.

**5/97 TO 1/98 - Licensing Consultant, Crystal River Nuclear Plant**

Performed nuclear oversight review and approval in the Safety Analysis Group, of 10CFR 50.59 Safety Assessment/USQ Determinations for all plant modifications, procedures, FSAR updates for punch list items in support of the restart of CR-3. This included upgrading program and implementing guidance of NEI 96-07 and NRC 9900 Inspection Manual for 10CFR50.59 guidance. Also included resolution of 10CFR50.54 issues for licensing/design basis management.

**7/96 to 5/97 - Retirement**

**4/92 to 7/96 - Director, Safety and Engineering Department, Westinghouse Hanford Co.**

Responsible for establishment and implementation of all programs to resolve technical and safety issues in licensing, (FSAR, 10CFR50.59, License Event Reports [LERs], Design Basis Evaluations [DBEs]), for the Hanford environmental remediation effort. Responsibility also included determining USQs and justification for continued operations plus leading systems engineering projects to evaluate alternatives and preparing design criteria for all process, equipment, and facilities for the remediation of Hanford nuclear waste.

**9/88 to 4/92 - Director, Safety Analysis and Risk Mgt., Westinghouse Savannah River Co.,**

Responsible for managing control and safety system design and analysis, compliance and licensing (FSARs, SARs, 10CFR50.59, 10 CFR50.54F, LERs, DBEs) plus probabilistic risk assessment for all facilities on site. This activity included hazard assessment, safety and accident analysis, probabilistic risk assessment (PRA) and human factor analysis to support startup and operation of reactor and all nuclear processing facilities on site. This function included interfacing and presenting results to the NRC, DOE, and the Defense Nuclear Facilities Safety Board.



**7/85 to 9/88 - Associate Director, Westinghouse Enterprises**

Responsible for development and implementation of Westinghouse diversification plan including initiatives in computer workstations, robotics, vision systems, and microelectronics. Performed market research and developed business plans including international joint ventures for over 15 technology commercializations. During this time served as President of Stirling Technology company, which is a Westinghouse supported startup company specializing in cryogenic and engine technology.

**1/80 to 7/85 - Manager, Risk Assessment Technology, Westinghouse**

Created PRA engineering service for the Westinghouse Energy business unit. Responsible for performing over twenty PRAs worldwide for the commercial nuclear power industry. Served as the chief witness for PRA usage and results at many hearings over the world including the Indian Point hearings (first PRA used in court of law). PRA results were also used to address the NRC back fit rules for post-Three Mile Island requirements.

**6/76 to 1/80 - Manager, Reactor Safety Analysis, PWR, Westinghouse**

Responsible for FSAR DBE analysis and licensing for Westinghouse Pressurized Water Reactor. Participated in over thirty FSAR developments and presentation with the NRC. Also managed the safety reviews and USQ determinations while establishing a very workable Quality Assurance and calculation note system accepted by the utilities and the NRC.

**12/72 to 6/76 - Lead Senior Engineer, Systems Engineering, PWR, Westinghouse**

Responsible for systems engineering design function of control and protection systems for commercial nuclear power reactors. This included Patent APR-74-1, automatic control.

**JOURNAL/SOCIETY PUBLICATION TITLE**

Simula Society of America, Simulation and Control of High Temperature Gas Cooled (HTGR) Nuclear Power Plant

British Nuclear Society, Boiler Dynamics for Nuclear Power Plants

IEEE, Evaluation of Methods Sizing and Layout of Control Panels Used for Nuclear Power Generating Stations

ANS, Assessment of Operator Procedures & Displayed Instruments During Transients

ANS, Coping with Change, Post TMI

ANS/ENS, Methodology to Evaluate & Quantify the Mitigative Aspects of Containment Structures

IAEA, Probabilistic Risk Assessment Use in Two-Loop Power Plant Safety Analysis

IAEA, A Decade of PRA Experience in the USA - What Has Been Achieved

IAEA, PRA Applications in Nuclear Plant Design With Diverse Regulatory Criteria

ANS, Use of Probabilistic Risk Assessment in Determining Nuclear Power Plant Systems Designs

ANS, Use of Probabilistic Safety Study in the Design of Italian Reference PWR

**ATTACHMENT 4**

**Evaluation of Experience and Qualifications of Dennis Richardson to  
Satisfy Hematite License Requirements for Project Director**

**Westinghouse Electric Company LLC, Hematite Decommissioning Project**

**Docket No. 070-00036**



Evaluation of Experience and Qualifications of Dennis Richardson to  
Satisfy Hematite License Requirements for Project Director

I. Introduction

This evaluation compares the experience and qualifications of Dennis Richardson to the experience and qualification requirements for the Project Director specified in Hematite License No. SNM-33. The content of Mr. Richardson's resume was the primary source used to ascertain his experience and qualifications. Based on the evaluation below, it is determined that Mr. Richardson's experience and qualifications meet or exceed the requirements of Hematite License No. SNM-33 that are applicable to the Project Director. A copy of his resume is provided as an Attachment 3 to this letter.

II. License Experience and Qualifications Requirements for Project Director

License Condition 16 of Hematite License No. SNM-33 incorporates by reference Section 9.3.1 of the Decommissioning Plan. Section 9.3.1 states:

"At a minimum the Project Director will meet the following qualifications:

- Bachelor's degree in an appropriate discipline or an equivalent combination of education and experience;
- Previous managerial experience in project management of large complex projects; and
- Training in nuclear safety."

III. Evaluation of Experience and Qualifications to License Requirements for Project Director

- *Bachelor's degree in an appropriate discipline or an equivalent combination of education and experience*

Based on the attached resume, Mr. Richardson holds a Master of Science Degree in Mathematics from California State University, San Diego; a Master of Science Degree in Mechanical Engineering from Penn State University, a Bachelor of Science Degree in Aerospace Engineering from Penn State University, and 40 years of experience in the nuclear industry. Therefore, this license requirement is satisfied.

- *Previous managerial experience in project management of large complex projects;*

The attached resume indicates that Mr. Richardson has over 20 years of managerial and supervisory experience in nuclear projects. This experience includes being a senior manager at the the Department of Energy Hanford Site while it was undergoing decommissioning. He has also been a senior manager at nuclear power plants and the Yucca Mountain Nuclear Waste Repository project. Therefore, this license requirement is satisfied.

- *Training in nuclear safety*

As indicated in his resume, Mr. Richardson has been responsible for programs related to nuclear safety and risk assessment for over 30 years. He has received nuclear safety training commensurate with those responsibilities. Therefore, this license requirement is satisfied.



#### IV. Conclusion

Based on the evaluation documented above, it is determined that Mr. Richardson's experience and qualifications meet or exceed the requirements for the Project Director specified in Section 9.3.1 of the Decommissioning Plan, and incorporated into the Hematite license.