

From: [Mike Thomas](#)
To: [Mandeville, Douglas](#)
Cc: [Glenn Catchpole](#)
Subject: RE: Updated LC 10.15 and LC 10.17
Date: Friday, April 11, 2014 4:28:13 PM

Doug,

Uranerz finds the proposed language acceptable.

Thanks,

Mike

Mike Thomas

Vice President Regulatory and Public Affairs

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From: Mandeville, Douglas [mailto:Douglas.Mandeville@nrc.gov]
Sent: Friday, April 11, 2014 2:04 PM
To: Mike Thomas
Subject: Updated LC 10.15 and LC 10.17

Mike –

Below is proposed revised language for LC 10.15 and new language for LC 10.17. There are no proposed changes to LC 10.16.

10.15 The licensee shall continue to collect meteorological data on a continuous basis at a data recovery rate of at least 90 percent until the NRC headquarters staff verifies in writing the data to be representative of long term conditions at the Nichols Ranch ISR Project. The data collected shall include, at a minimum, temperature, wind speed, and wind direction. Data submitted shall include an annual wind rose and a summary of the stability classification. Justification of the similarity or validity of the data shall include an analysis of the statistical data presented to illustrate confidence in the representativeness of the data.

Until the NRC headquarters staff verifies in writing that the meteorological data

are representative of long term conditions at the Nichols Ranch ISR Project, the licensee shall continue to evaluate meteorological conditions to ensure that projected doses to members of the public and locations of environmental monitoring stations and radon detectors remain consistent with analyses submitted on February 28, 2014 (ML14063A214) and March 6, 2014 (ML14066A051). The licensee shall submit the results of this evaluation and discuss any proposed changes to its environmental monitoring program in the semi-annual operational effluent and environmental monitoring program report required by License Condition 11.1(D) to NRC headquarters for review.

10.17 Prior to the injection of lixiviant at the Hank Unit, the licensee shall provide to the NRC headquarters staff for review and written verification the following information for the airborne effluent and environmental monitoring program for the Hank Unit. The licensee shall develop written procedures to incorporate this information.

- A. Discuss how, in accordance with 10 CFR 40.65, the quantity of the principal radionuclides from all point and diffuse sources will be accounted for, and verified by, surveys and/or monitoring.
- B. Evaluate the member(s) of the public likely to receive the highest exposures from licensed operations consistent with 10 CFR 20.1302.
- C. Discuss and identify how radon (radon-222) progeny will be factored into analyzing potential public dose from operations consistent with 10 CFR Part 20, Appendix B, Table 2.
- D. Discuss how, in accordance with 10 CFR 20.1501, the occupational dose (gaseous and particulate) received throughout the entire license area from licensed operations will be accounted for, and verified by, surveys and/or monitoring.

Please let me know if these are acceptable.

Doug