



July 6, 2015

U.S. Nuclear Regulatory Commission
Nuclear Material Safety and Safeguards
Division of Decommissioning, Uranium Recovery, and Waste Programs
Uranium Recovery Licensing Branch
Attention: Mr. John Saxton, Project Manager
Two White Flint North, Mail Stop 8 F5
1545 Rockville Pike
Rockville, MD 20852

Re: Strata Energy Ross In Situ Recovery Project
Source Materials License SUA-1601, Docket No. 040-09091
Supplemental Information for Preoperational License Condition 12.10

Dear John:

Per License Condition (LC) 12.10, Strata Energy, Inc. (Strata) submitted a Quality Assurance Plan (QAP) to the Nuclear Regulatory Commission (NRC) for review and verification on March 5th, 2015. Following our discussions on July 1, 2015 Strata is submitting supplemental information to the QAP to ensure that all requirements set forth in LC 12.10 are met. The supplemental information is listed below.

LC 12.10 states in part: "The QAP will include the requirements in 10 CFR 20.1703(c)(4)(vii)..." 10 CFR 20.1703(c)(4)(vii) states that the licensee shall implement and maintain a respiratory protection program that includes: "Storage, issuance, maintenance, repair, testing, and quality assurance of respiratory protection equipment". As such, Strata has included wording in the QAP to meet this requirement. Those wording is provided below.

Under the section F.1, the following bullet point has been added: "Quality assurance of respiratory protection equipment"

The following section was also included: "F.1.9 Respiratory Protection Equipment. The respiratory protection equipment is selected, issued, stored, cleaned, maintained, repaired, inspected, tested, and controlled for contamination according to Strata's Radiation Protection Program (RPP) which is based on the guidance set forth in NRC's Regulatory Guide 8.15. Additionally, the respiratory protection program will undergo an annual program evaluation to ensure the program meets the standards set forth in 10 CFR 20.1703." The annual program evaluation is discussed further in RPP Section I.13.

LC 12.10 also states in part: "The QAP will include the requirements in 10 CFR 20.1703(c)(4)(vii), and be consistent with guidance for a Quality Assurance Project Plan in Regulatory Guide 4.15 (as revised)." Regulatory Guide 4.15 Section C.10 states the importance of having preventive and corrective actions as an integral component of a quality assurance program. As such, Strata has included a Preventive and Corrective Actions section (new Section J) to the Strata QAP. The included section is provided below, and is based on regulatory guidance set forth in NRC's Regulatory Guide 4.15.

SECTION J Preventive and Corrective Actions

The preventive and corrective actions aspect of the QAP ensures continuous improvement processes are implemented, deficiencies and non-conformance in programs are defined and identified, and corrective or preventive actions are taken.

J.1 Deficiencies and Non-conformance

Assessments, audits, inspections, and surveillance form the basis of the continuous improvement program. These methods allow for identification of deficiencies and non-conformance in programs, tasks, or performance as well as providing valuable information on areas of improvement. The information from these methods is reviewed by appropriate personnel, and these personnel have the authority to implement corrective actions to ensure the program, task or performance meets quality or regulatory acceptance criteria. Documentation of the deficiency or non-conformance is taken, tracked, and reported to appropriate management and regulatory agencies if required.

J.2 Corrective Actions

In the event that a program, task, or performance does not meet regulatory or quality acceptance criteria, corrective action is taken to ensure the program or task meets the appropriate criteria. The corrective action process involves the basic elements:

- Identification and documentations;
- Classification;
- Cause analysis;
- Corrections;
- Follow-up; and
- Closure

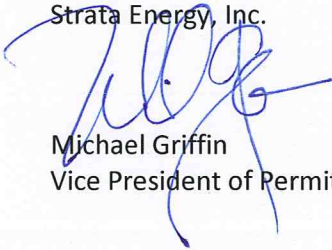
Documentation of the corrective action is taken, tracked, and reported to appropriate management and regulatory agencies if required. To ensure the effectiveness and adequacy of the corrective action, follow-up reviews will be conducted and documented. Management or appropriate personnel who review and implement the corrective action(s) will have sufficient authority to rectify the problem.

Mr. John Saxton
July 6, 2015

Strata believes that this supplemental information added to the QAP will ensure that Strata's QAP meets the requirements set forth in LC 12.10. Please contact me if you have any questions. You can reach me at (307) 686-4066 or mgriffin@stratawyo.com.

Sincerely,

Strata Energy, Inc.

A handwritten signature in blue ink, appearing to read 'M. Griffin', is written over the printed name and title.

Michael Griffin
Vice President of Permitting, Regulatory and Environmental Compliance