



July 6, 2015

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555-0001

Re: Strata Energy Ross In Situ Recovery Project  
Source Materials License SUA-1601, Docket No. 040-09091  
Minor Revision to License Amendment Request to License Condition 9.7

To Whom It May Concern:

In a letter dated July 1, 2015, Strata Energy, Inc. (Strata) submitted to the Nuclear Regulatory Commission (NRC) a letter which proposed a License Amendment to Source Material License SUA-1601. The July 1 letter requested that the NRC amend License Condition (LC) 9.7 of SUA-1601 to allow for a qualified Designee to perform daily inspections for four (4) consecutive days in the case of the Thanksgiving holiday. On certain years, Strata's holiday schedule gives Strata employees Christmas Eve and Christmas Day as holidays that may fall before or after a weekend. As such, Strata is requesting that the NRC also include the Christmas holiday in the wording of the License Amendment to reflect Strata's holiday schedule. To support Strata's request, attached please find the following information:

- Form 313 as Attachment 1
- Supplement to Form 313 (Sections 5-11) as Attachment 2
- Requested changes to License Condition 9.7 of Source Material License SUA-1601 as Attachment 3

Strata requests that that NRC staff review and approve the proposed License Amendment. Please contact me if you have any questions. You can reach me at (307) 686-4066 or [mgriffin@stratawyo.com](mailto:mgriffin@stratawyo.com).

Sincerely,

Strata Energy, Inc.

  
Michael Griffin  
Vice President of Permitting, Regulatory and Environmental Compliance

Cc: Mr. John Saxton, NRC Project Manager – via email

NM5501  
NM55

**Attachment 1**

**ROSS URANIUM PROJECT SUA-1601 SOURCE MATERIALS LICENSE AMENDMENT REQUEST  
NRC Form 313 Attachment**

**APPLICATION FOR MATERIALS  
LICENSE**

Estimated burden per response to comply with this mandatory collection request: 4.3 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the FOIA, Privacy, and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to [Infocollections.Resource@nrc.gov](mailto:Infocollections.Resource@nrc.gov), and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0120), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

**INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW. \*AMENDMENTS/RENEWALS THAT INCREASE THE SCOPE OF THE EXISTING LICENSE TO A NEW OR HIGHER FEE CATEGORY WILL REQUIRE A FEE.**

**APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:**

OFFICE OF FEDERAL & STATE MATERIALS AND  
ENVIRONMENTAL MANAGEMENT PROGRAMS  
DIVISION OF MATERIALS SAFETY AND STATE AGREEMENTS  
U.S. NUCLEAR REGULATORY COMMISSION  
WASHINGTON, DC 20555-0001

**ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:****IF YOU ARE LOCATED IN:**

ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, GEORGIA,  
KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY,  
NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO, RHODE ISLAND, SOUTH  
CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA,

**SEND APPLICATIONS TO:**

LICENSING ASSISTANCE TEAM  
DIVISION OF NUCLEAR MATERIALS SAFETY  
U.S. NUCLEAR REGULATORY COMMISSION, REGION I  
2100 RENAISSANCE BOULEVARD, SUITE 100  
KING OF PRUSSIA, PA 19406-2713

**IF YOU ARE LOCATED IN:**

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN,  
SEND APPLICATIONS TO:

MATERIALS LICENSING BRANCH  
U.S. NUCLEAR REGULATORY COMMISSION, REGION III  
2443 WARRENVILLE ROAD, SUITE 210  
LISLE, IL 60532-4352

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS,  
LOUISIANA, MISSISSIPPI, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH  
DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS,  
UTAH, WASHINGTON, OR WYOMING,

**SEND APPLICATIONS TO:**

NUCLEAR MATERIALS LICENSING BRANCH  
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV  
1600 E. LAMAR BOULEVARD  
ARLINGTON, TX 76011-4511

**PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTIONS.**

**1. THIS IS AN APPLICATION FOR (Check appropriate item)**

☐ A. NEW LICENSE

☒ B. AMENDMENT TO LICENSE NUMBER

SUA-1601

☐ C. RENEWAL OF LICENSE NUMBER

**2. NAME AND MAILING ADDRESS OF APPLICANT (Include ZIP code)**

Strata Energy, Inc.  
PO Box 2318  
Gillette, WY 82717-2318

**3. ADDRESS WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED**

2929 New Haven Road  
Oshoto, WY 82721

**4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION**

Michael Griffin

BUSINESS TELEPHONE NUMBER  
307.686.40

BUSINESS CELLULAR TELEPHONE NUMBER

BUSINESS EMAIL ADDRESS  
[mgriffin@stratawyo.com](mailto:mgriffin@stratawyo.com)

SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

**5. RADIOACTIVE MATERIAL**

a. Element and mass number; b. chemical and/or physical form; and c. maximum amount which will be possessed at any one time.

**6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.****7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING EXPERIENCE.****8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.****9. FACILITIES AND EQUIPMENT.****10. RADIATION SAFETY PROGRAM.****11. WASTE MANAGEMENT.****12. LICENSE FEES (Fees required only for new applications, with few exceptions\*)  
(See 10 CFR 170 and Section 170.31)**

FEE CATEGORY

AMOUNT  
ENCLOSED \$

**13. CERTIFICATION. (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.**

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 37, 39, AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.

WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

CERTIFYING OFFICER - TYPED/PRINTED NAME AND TITLE

SIGNATURE

DATE

**FOR NRC USE ONLY**

TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS
			\$		
APPROVED BY				DATE	

## Attachment 2

### ROSS URANIUM PROJECT SUA-1601 SOURCE MATERIALS LICENSE AMENDMENT REQUEST NRC Form 313 Attachment Items 5 Through 11

#### Applicant

Strata Energy, Inc.  
1900 W. Warlow Dr., Bldg. A,  
Gillette, Wyoming 82716

#### **5. Radioactive Material:**

##### a) Element and Mass Number:

Uranium- Unat (U238, U234, and U235)

##### b) Chemical and/or Physical Form:

Chemical form is U3O8

Solution of 0 to 50 grams/liter

Dried Yellowcake- 50% to 80% U

##### c) Maximum Amount which will be possessed at any one time:

Unlimited

#### **6. PURPOSE FOR WHICH LICENSED MATERIAL WILL BE USED:**

Fuel for electricity generation from nuclear power plants.

#### **7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING EXPERIENCE:**

Individual: Michael Griffin

Training: 31 years as Radiation Safety Officer experience including Uranium Mill Tailings Remedial Action (UMTRA) Project; Title II conventional uranium mill decommissioning projects; Manager of Health, Safety and Environment Affairs for Cameco Resources (Crow Butte Mine (SUA-1534) 1998-2006); Vice President of Safety, Health, and Environment for Uranium One (Willow Creek Uranium Project (SUA-1341) 2007 to 2012); Vice President of Permitting, Regulatory and Environmental Compliance for Strata Energy, Inc. (2012 to Present).

#### **8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS:**

This information is provided in detail in Section 5 of the approved License Application and supplemental submissions.

#### **9. FACILITIES AND EQUIPMENT:**

This information is provided in detail in Section 3 of the approved License Application and supplemental submissions.

**10. RADIATION SAFETY PROGRAM:**

This information is provided in detail in Section 5 of the approved License Application and supplemental submissions.

**11. WASTE MANAGEMENT:**

This information is provided in detail in Section 4 of the approved License Application and supplemental submissions.

## Attachment 3

### ROSS URANIUM PROJECT SUA-1601 SOURCE MATERIALS LICENSE AMENDMENT REQUEST License Amendment Request

The section of License Condition 9.7 to be amended currently reads:

- *A qualified designee may perform daily inspections on weekends, holidays, or times when both the RSO or RST(s) must both be absent (e.g., illness or offsite training). A designee shall not perform daily inspections for more than two consecutive days except in the event of a Federal or company holiday, whereby the designee will not exceed more than three consecutive days.*

Strata requests that the wording of License Condition 9.7 stated above be changed to:

- *A qualified designee may perform daily inspections on weekends, holidays, or times when both the RSO and RST(s) are absent. A qualified designee shall perform daily inspections for no more than 2 consecutive days per week, except when a Federal holiday falls on a Monday or Friday (3 days), and the Christmas and Thanksgiving holidays when those holidays are Thursday and Friday or Monday and Tuesday (4 days).*