

From: [Saxton, John](#)
To: [Mike Griffin](#); [Nikolas Roche](#)
Cc: [Brown, David](#)
Subject: FW: Additional Questions on Strata's July 1, 2015 letter (ML15195A430).
Date: Wednesday, August 05, 2015 5:48:00 AM

Nikolas,

Here are those 3 comments on license Condition 12.4.

John

From: Brown, David
Sent: Tuesday, August 04, 2015 3:33 PM
To: Saxton, John
Subject: Additional Questions on Strata's July 1, 2015 letter (ML15195A430).

John,
As we discussed, I have three additional comments on Strata's July 1, 2015, response to License Condition 12.4.

Dave

NRC staff has the following additional comments on Strata's July 1, 2015, response to License Condition 12.4 regarding Strata's proposed Qualified Designated Operator program (ML15195A430).

1. In Attachment 1, under the section titled "Qualified Designated Operators (Designee)," Strata stated in the last bullet:

- The RSO and RST will continually assess the adequacy of daily inspections completed by all qualified Designated Operators. On a recurring basis the RSO or RST will accompany Qualified Designated Operators on no less than semi-annual inspections. The RSO or RST will signify in writing by signing (initialing) and dating inspection reports completed by Designees. All training and testing will be documented in writing.

On the basis of programs previously approved by NRC staff, requalification will include at least: five inspections annually under supervision of an RSO or RST (NRC 2013), or; 2 inspections performed semi-annually under supervision of an RSO or RST plus annual refresher training with a written examination and passing grade of at least 80% (NRC 2014).

2. In Attachment 1, under the section titled "Qualified Designated Operators (Designee)," Strata stated in the first sentence of the first paragraph that:

"The Designee is used at off-shift times (principally weekend and holidays) to complete the Daily Radiation Safety Inspection of the CPP in the absence of both the RSO and RST."

The guidance in Regulatory Position 2.3.1 of Regulatory Guide 8.31, "Information Relevant to Ensuring that Occupational Radiation Exposures at Uranium Recovery Facilities Will Be As Low As Is Reasonably Achievable," states that the daily walk-through inspection should include "all work and storage areas of the facility," and not just the central processing plant (CPP).

3. In Attachment 1, under the section titled "Qualified Designated Operators (Designee)," Strata stated at the end of the first paragraph that:

"The Vice President of Permitting, Regulatory and Environmental Compliance or the Radiation Safety Officer (RSO) shall make the determination that an individual meets the education, training, and experience requirements to be trained and qualified as a Designee."

On the basis of programs previously approved by NRC staff, an RSO makes the qualification determination (NRC 2013, 2014). While the current Vice President of Permitting, Regulatory and Environmental Compliance may be an NRC-approved alternate RSO, the person who holds that position in the future may not have the qualifications of an RSO, which are required to make the designee determination.

References

NRC (U.S. Nuclear Regulatory Commission). 2013. Letter from A. Persinko to S. Hatten, dated April 22, 2013, regarding "Lost Creek Project, Source Materials License SUA-1598 License Amendment No. 1 – Technical Report Page Changes, 2011-2012 Financial Assurance Update, and Addition of Two Dryers (TACS J00562, J00662, J00665)." Washington, D.C. Accession No. ML13016A071.

NRC (U.S. Nuclear Regulatory Commission). 2014. Letter from L. Camper to L. Teahon, dated November 5, 2014, regarding "Materials License SUA-1534, License Renewal, Crow Butte Resources, Inc., Crow Butte Uranium in Situ Recovery Project, Dawes County, Nebraska (TAC J00555)." Washington, D.C. Accession No. ML13324A090.