



July 27, 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
Request for a License Amendment to Source Material License SUA-1601 License Condition 12.8

To Whom It May Concern:

By letter dated July 23, 2015, the Nuclear Regulatory Commission (NRC) submitted to Strata Energy, Inc. (Strata) a response to Strata's License Amendment Request to Source Material License SUA-1601 License Conditions (LC) 12.6, 12.7, and 12.8, dated March 1, 2015 (ADAMS Accession No. ML15103A045). The response had several comments as well as a request for additional information (RAI). This letter concentrates on the RAI pertaining to LC 12.8, while a separate submittal to the NRC addresses the comments regarding LC 12.6 and 12.7.

In the July 23, 2015 response by the NRC to the License Amendment request, the requirements set forth in Source Material License SUA-1601 License Condition (LC) 12.8 were discussed. LC 12.8 states:

"Prior to the preoperational inspection, the licensee shall develop a survey program that will meet the requirements of 10 CFR Part 20, Subpart F to detect beta-gamma contamination on personnel exiting restricted areas and to detect beta-gamma contamination in unrestricted and restricted areas. The licensee shall provide, for NRC staff review and approval, the surface contamination detection capability (scan MDC) of the radiation survey meters used in surveys for releasing equipment and materials to unrestricted use or personnel contamination. In the scanning mode, the detection capability for any expected alpha and beta radiation shall be provided in terms of dpm per 100 cm²."

After reviewing Strata's March 1, 2015 submittal, the NRC staff found that the submittal did not provide adequate information regarding the surface contamination detection capability (scan MDC) of the radiation survey instruments which were proposed to be used in surveys for releasing equipment and materials to unrestricted use or personnel contamination. The specific wording from the RAI is as follows:

"In order to comply with LC 12.8, Strata must calculate surface contamination detection capability (scan MDC) of the radiation survey meters used in surveys for releasing equipment and materials to unrestricted use or personnel contamination."

NM5501

The NRC staff did not address the main point of the submittal, namely that only those beta-gamma surveys which were committed to in the Strata Technical Report (TR) (ADAMS Accession No. ML110120063) would be conducted until characterization studies demonstrated that additional beta-gamma surveys for contamination control were required. Of particular interest, Strata's TR only committed to doing contamination surveys for alpha radiation for personnel exiting restricted areas.

However, Strata recognizes that additional survey requirements for beta-gamma contamination control are not an unreasonable burden and have been adopted by several other operators in the uranium recovery (UR) industry. Thus, in accordance with the ALARA principle, Strata is submitting a revised survey program to detect beta-gamma contamination on personnel exiting restricted areas and to detect beta-gamma contamination in unrestricted and restricted areas. The revised survey program will ensure that the survey program used by Strata will meet the requirements of 10 CFR Part 20, Subpart F. The revised survey program is included as Attachment 4.

The requested calculations for surface contamination detection capabilities of the radiation survey meters are included as Attachment 3. Due to the lack of information regarding some of the variables, namely instrument efficiency and the background count rate, Strata has used the manufacturer's specifications for the instruments and values of background rates from other operating UR facilities to estimate the values for those variables. Strata commits to recalculation of the detection capabilities, using obtained data while in operation, within six (6) months of the start of operations to verify that the radiation detection instrumentation is adequate. This verification will be documented, stored, and made available for NRC review upon request.

Strata requests that NRC staff review and approve the submitted calculations for surface contamination detection capabilities of the radiation survey meters and the revised Beta-Gamma Contamination Control Survey Program. Should the NRC staff find the instrumentation and survey program adequate, Strata requests a License Amendment to Source Material License SUA-1601, namely the removal of the preoperational License Condition 12.8 from SUA-1601. To support Strata's request, attached please find the following information:

- Completed Form 313, as required by 10 CFR 40 (Attachment 1)
- Supplement to Form 313 (Sections 5-11) (Attachment 2)
- Instrument Specifications and Additional Considerations (Attachment 3)
- Beta-Gamma Contamination Control Survey Program (Attachment 4)

Please contact me if you have any questions. You can reach me at (307) 686-4066 or 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

Attachment 1

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

NRC FORM 313

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0120

EXPIRES: 05/31/2015

(03-2014)
10 CFR 30, 32, 33, 34
35, 36, 37, 39, and 40APPLICATION 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, 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)

Mike Griffin
PO Box 2318
Gillette, WY 82717

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

Mike Griffin

BUSINESS TELEPHONE NUMBER
(307) 686-4066

BUSINESS CELLULAR TELEPHONE NUMBER

BUSINESS EMAIL ADDRESS
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.

8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.

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

10. RADIATION SAFETY PROGRAM.

9. FACILITIES AND EQUIPMENT.

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

Michael Griffin, Vice President

SIGNATURE

DATE

7/27/2015

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 UO_4

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: Nikolas Roche

Training: Master's Degree in Health Physics from Colorado State University; three (3) weeks of specialized training in information directly relevant to Uranium Recovery facilities; two (2) years of experience working at a UR facility at Cameco's Smith Ranch-Highland site (2011-2013); currently Radiation Safety Officer for Strata Energy, Inc. (2015 – 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

INSTRUMENT SPECIFICATIONS AND ADDITIONAL CONSIDERATIONS

Instrumentation Specifications

Any potential contamination from radionuclides emitting gamma radiation will be detected using a Ludlum Model 19 or Ludlum Model 9-3, or equivalent instrumentation. The Model 19 is a highly sensitive uR meter, while the Model 9-3 is an air ionization chamber for areas with elevated gamma radiation. The Model 19 has a measuring range of background to 5mR/hr. The Model 9-3 has the ability to perform beta-gamma dose rate measurements from background to 50 R/hr. The Model 9-3 also has a 1,000 mg/cm² retractable beta shield which will allow for beta measurement with a 7 mg/cm² shield. Per the manufacturer's specification, the Model 9-3 and Model 19 have readings within 10% of true value.

Any potential removable contamination will be detected using a Ludlum Model 3030, or equivalent instrumentation. The Model 3030 is a sample counter capable of detecting both alpha and beta radiation. The Model 3030 consists of a detector of ZnS(Ag) adhered to plastic scintillation material. The window is 0.4 mg/cm² aluminized mylar with an active and open area of 20.3 cm². The sample holder is capable of holding a sample with up to a 5.1 cm diameter. The efficiency (4pi) of the detector for alpha is listed as 32% for Th-230, 39% for U-238, and 37% for Pu-239. The efficiency (4pi) of the detector for beta is listed as 8% for C-14, 27% for Tc-99, 29% for Cs-137, and 26% for Sr/Y-90. The background is 3cpm or less for alpha, and typically 50 cpm or less for beta (in a 10 uR/hr field).

Any potential contamination from radionuclides emitting alpha and/or beta radiation will be detected using a Ludlum Model 2360 ratemeter/scalemeter/data logger coupled with a Ludlum Model 43-93 alpha/beta probe, or equivalent instrumentation. The Model 43-93 probe is a ZnS(Ag) adhered to 0.0254 cm thick plastic scintillation material. The efficiency of the probe is 20% of Pu-239, 15% of Tc-99, and 20% of Sr/Y-90. The window is 1.2 mg/cm² metalized polyester. The background is rated as 3 cpm or less for alpha, and 300 cpm or less for beta.

Strata does not currently know the efficiency of the instruments to be used nor the background count rate, as the instruments and calibrated sources are still in the process of being shipped and Strata has not yet begun operations. However, the efficiency of the instruments can be approximated from the manufacturer specifications, and the background count rate can be estimated from the background count rate at other operating Uranium Recovery (UR) facilities. The Minimum Detectable Concentration (MDC) for the Ludlum Model 43-93 has been calculated by two other operators and submitted to NRC for approval by letters titled "Lost Creek Project, NRC License SUA-1598, Docket No. 40-9068, Amendment Request to Remove License Conditions 12.10, 12.11 and 12.12" and "Uranerz Energy Corporation, Nichols Ranch Project, Source Materials License SUA- 1597, Docket No. 040-09067, License Condition 12.11 Request for Additional Information Dated February 13, 2014." (ADAMS accession no. ML14064A128), dated July 12, 2013 and February 18, 2014 respectively.

The first submittal approximated the MDC for alpha at 346 dpm/100 cm² and the MDC for beta at 931 dpm/100 cm². The efficiency used for alpha was 13.3% while the efficiency for beta-gamma was 32.7%. The background count time was 1 minute, while the survey time was 4 seconds.

The second submittal used a slightly different approach and calculated for the maximum background in counts for the detection of contamination of 900 dpm/100cm² (to be able to meet the release limit of 1,000 dpm/100cm²). The formula used to calculate the MDC is from NUREG-1507, Section 3.1. For the approximations used by the operator, the results showed that the background must be under 1,271 cpm on the instrument. The values used by the operator were a 20% efficiency (the average efficiency for the instrument as quoted by Ludlum was 25%, so a more conservative value was used), a five (5) minute background count time, and a 0.5 minute sample count time. The operator then went on to discuss that the manufacturer's specifications for the Model 43-93 is 15-20 cpm per uR/hr. The operator explained that the average background seen at scanning stations at other UR facilities is between 20 and 30 uR/hr, and thus the conservative value of 30 uR/hr background was used. From those approximations, the operator estimated that the background reading on the instrument would be 600 cpm, below the 1,271 cpm limit for background for the instrument to see 900 dpm/100cm². The NRC has reviewed and approved the beta-gamma contamination control program for this operator, including the above mentioned instrumentation.

Additional Considerations

From the previously approved submittal by Uranerz, it can be seen that the MDC for the instrument Ludlum Model 43-93 is sufficient for a use in a beta-gamma contamination control program. However, Strata will take precautions to ensure that the background seen at the scanning stations is indeed below 30 uR/hr. If elevated background is detected, the personnel, equipment, or material will be moved to an area of lower background.

As stated in the Beta-Gamma Contamination Control Survey Program, the static sample will be the determinant in deciding if the contamination is above applicable limits. However, proper scanning techniques emphasizing the need for a controlled, slow speed while scanning will be addressed during radiation training and in the appropriate operating procedures.

The counting time for static sampling will be one (1) minute to ensure adequate detection time, and the counting time will be stipulated in the appropriate operating procedures. The use of a scalemeter as opposed to a ratemeter will be beneficial in ensuring the one minute sample count time is utilized. The instrument additionally has an alarm feature, which will aid in alerting scanning personnel that the contamination levels are above prescribed limits.

Additionally, Strata will utilize the recommendations set forth in NUREG-1507 to ensure that a scan of the personnel, equipment, or material is performed to maximize the instrument's ability to detect the radioactive contamination.

Specifically, as prescribed in NUREG-1507 Section 4.1, Strata has purchased radionuclide sources for calibration of instruments which emit radiation at energies most closely resembling those encountered at UR facilities. Strata has purchased a Th-230 source for calibration for alpha radiation, and a Sr-90 source for calibration for beta radiation.

As well, Strata's procedures for personnel, equipment, or material scanning of potential contamination state that the probe face should be held 1/8th of an inch (0.3125 cm) from the material being scanned. This ensures that the probe is far enough away from the material that the probe face will not get

contaminated, while also ensuring that the probe is able to detect the maximum amount of contamination potentially present. This is consistent with the data displayed in NUREG-1507, Table 4.4 and Table 4.5. Although the tables were populated using a gas proportional detector as opposed to the proposed ZnS detector, the overarching principle is still illustrated, namely improved detection efficiency if the detector is closer to the source.

Attachment 4

BETA-GAMMA CONTAMINATION CONTROL SURVEY PROGRAM

A contamination control program is outlined in Strata's Technical Report (TR) Section 5.7.6. The following information is meant to supplement the commitments set forth in Strata's TR Section 5.7.6. Strata will utilize the technique of slowly scanning personnel, equipment, or material until an elevated reading is observed, and then the user will hold the detector over the area in question for a static sampling. Thus the decision to determine if the frisk is within compliance with contamination limits will be determined by use of the static measurement.

Surveys for Surface Contamination in Restricted Areas

A program for surveying for surface contamination in restricted areas from beta radiation is already described in the TR. No further clarification or additional commitments are needed.

General Plant and Unrestricted Areas

In accordance with the TR Section 5.7.6.1.2, weekly spot-checks by the RSO or RST for removable surface contamination using filter paper smear tests will be conducted. The smear tests will now also include analysis for beta contamination. The smear tests will be analyzed using a Ludlum Model 3030 sample counter, or equivalent instrumentation. Consistent with the TR Section 5.7.6.1.2, contamination levels for alpha or beta exceeding the applicable values will be cause for immediate cleaning by trained radiation workers.

Special Surveys during Maintenance Activities

In accordance with the TR Section 5.7.6.1.3, contamination surveys may be conducted before, during, or after non-routine work. These surveys will be conducted at the discretion of the RSO, and will generally be specified in an operating procedure related to the task or in the Radiation Work Permit issued for the task. Contamination surveys will be performed using the Ludlum Model 2360 and Ludlum Model 43-93 instruments, or equivalent instrumentation. Both alpha and beta-gamma contamination will be surveyed for and appropriately documented.

Contamination Surveys for Personnel leaving Restricted Areas

Personnel who are exiting a restricted area are required to perform a contamination survey to ensure contamination control. The requirements for when personnel need to perform the survey and the procedure for performing the survey are outlined in the TR Section 5.7.6.2. A formal procedure is also included in the Radiation Protection Program. Additional to the requirements set forth in the TR Section 5.7.6.2, personnel must also perform a survey using instrumentation which is capable of detecting potential beta-gamma contamination. Thus the survey will be accomplished using a Ludlum Model 2360 ratemeter/scalemeter/data logger coupled to a Ludlum Model 43-93 probe, or equivalent survey

instrumentation, as this instrumentation allows for the detection of alpha and beta contamination. The action limits and applicable regulatory limits are provided in the section below titled "Applicable Limits".

Contamination Surveys for Equipment or Material

A Ludlum Model 2360 ratemeter/scalemeter/data logger with a Ludlum Model 43-93 alpha/beta probe and a Ludlum Model 19 or Ludlum Model 9-3, or equivalent survey instrumentation, will be utilized for contamination surveys of equipment or materials which are to be released to unrestricted areas. The procedure for contamination surveys for equipment or materials is outlined in the TR Section 5.7.6.3.1, and a formal procedure is set forth in the Radiation Protection Program. The action limits and applicable regulatory limits are provided in the section below titled "Applicable Limits".

Applicable Limits

The applicable regulatory limits for alpha and beta-gamma contamination on personnel exiting a restricted area, or for the release of equipment or material for unrestricted use, will be those limits set forth in NRC's FC 83-23, Enclosure 2, Table 1. Per the discussion in the TR Sections 5.7.6.3.2 and 5.7.6.2.1, the limits to be used for beta-gamma contamination in relation to U-Nat, U-235, U-238, and associated decay products are identical to those for alpha contamination as outlined in NRC's Regulatory Guide 8.30 Table 2. However, the additional stipulation outlined in footnote "f" of Table 1 of Enclosure 2 to NRC's FC 83-23 will be enforced.

The internal action level for alpha contamination levels for personnel exiting a restricted area is outlined in the TR Section 5.7.6.2. This internal action level will now apply to alpha and beta-gamma contamination levels. The goal is no personal contamination above background levels. The TR Section 5.7.6.2 states that a typical alarm setting for personnel exiting a restricted area would be 20 cpm above background. Thus an internal limit of 20 cpm above background will initially be used. The internal limit may be changed at the RSOs' discretion. Any contamination on personnel exiting a restricted area is considered removable, and thus the 1,000 dpm/cm² limit applies. The exception to the 1,000 dpm/cm² limit as discussed in NRC's Regulatory Guide 8.30 is the soles of the shoes, which has a limit of 5,000 dpm/cm². Detailed procedures for removal of contamination should levels be elevated above the action level are provided in the TR Section 5.7.6.2.1. The inclusion of surveying for beta-gamma contamination will not change the procedures outlined in the TR Section 5.7.6.2.1.

The internal action level for release of equipment and materials for unrestricted use will be 75% of the regulatory limits to ensure that released equipment or materials will not exceed the applicable limits.