STRATA ENERGY INC

A WHOLLY-OWNED SUBSIDIARY OF PENINSULA ENERGY LIMITED

July 30, 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
Response to Comments on Submittal for License Condition 12.7

To Whom It May Concern:

By letter dated July 23, 2015, the Nuclear Regulatory Commission (NRC) submitted to Strata Energy, Inc. (Strata) a technical review of Strata's March 1, 2015 License Amendment Request (ADAMS Accession No. ML15103A045). The technical review had several comments, as well as a request for additional information (RAI). This document addresses the NRC staff's comments regarding License Conditions (LC) 12.6 and 12.7. A separate document was submitted by letter dated July 27, 2105 to the NRC to address the RAIs for LC 12.8. Strata has provided several documents with this letter, and these are listed below:

- The responses to NRC's comments are provided in Attachment 1
- A map showing proposed survey locations regarding LC 12.7(B) is provided in Attachment 2
- A map showing the area to be designated as the "CPP General Area" is provided in Attachment 3
- A map showing the locations of the sample ports for analyzing the concentrations of radon in water is provided in 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**

NMSS01

Attachment 1

ROSS URANIUM PROJECT SUA-1601 SOURCE MATERIALS LICENSE
Response to NRC Comments

NRC Comment No. 1 – Form 313 Incomplete
The Form 313 provided as Attachment 1 to Strata's request is not complete. Items 5 through 11 of Form 313 were not provided.

Comment: Strata should provide a complete Form 313 for the proposed amendment.

Response to Comment No. 1:
Strata has submitted to the NRC a new License Amendment regarding License Condition 12.8 with a complete Form 313 attached. As such, a complete Form 313 will not be required with this submittal.

Comment No. 2 - Yellowcake Characterization
In light of Strata's previous commitment to characterize yellowcake, the commitment in Attachment 2 of its March 1, 2015, letter appears to clarify: (1) when the yellowcake would be characterized (i.e., within first 3 months of operation); and (2) what characterization would be performed (i.e., isotopic composition and total alpha and beta activity). However, Strata did not explain why it was committing to additional detail in its requirement to characterize yellowcake, and how this information would be relevant to the requirement in license condition 12.7 to 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.

Comment: Strata should explain how the additional detail regarding yellowcake characterization relates to LC 12.7(A)

Response to Comment No. 2:
Section 1.4.1 of Attachment 2 of the March 1, 2015 letter attempted to provide further detail relating to the isotopic analysis outlined in Strata's Technical Report (TR) Section 5.7.3.1.1. Section 1.4.1 stated that the isotopic analysis would be undertaken within the first 3 months of dryer operation. A specific timeframe for isotopic analysis was not provided in the TR Section 5.7.3.1.1. Section 1.4.1 also committed to undertaking a general characterization of the radionuclide composition of the Ross ISR product relative to isotopic composition. TR Section 5.7.3.1.1 only committed to analyzing the samples for U-nat, Th-230, and Ra-226.

Thus the purpose of Section 1.4.1 was to commit to a specific timeframe while also committing to a more comprehensive evaluation of the radionuclides present in the Ross ISR product. The more thorough isotopic analysis would allow for a greater understanding of the quantity of the principal radionuclides present in the yellowcake product to be in compliance with 10 CFR 40.65.

Comment No. 3 Methodology for Sampling and Analyzing Radon in Water

Strata did not explain its method for determining concentrations of radon in water. For example, one method for measuring radon in water is ASTM D5072-09, "Standard Test Method for Radon in Drinking Water" (ASTM 2009). When describing this method or another other, Strata should describe how it will control the pressure of lixiviant sampling to obtain a representative sample and also provide either a detailed description of the sampling locations and/or a piping diagram and sketch of the sampling station in detail sufficient to demonstrate that sample results will be representative of lixiviant conditions.

Comment: Strata should explain its method for sampling and analyzing radon in water.

Response to Comment No. 3:

Strata plans to follow the method for measuring radon in water from ASTM D5072-09, *"Standard Test Method for Radon in Drinking Water" (ASTM 2009)*. Sampling will be performed at the sampling location where the plant operators sample the daily grab or composite production/injection solution samples. The sample ports will be fitted with valves that allow the sampler to regulate the pressure and flow rate. The location of the sample ports are indicated in the piping diagram included in Attachment 4.

The sampling method will be the immersion technique, described as follows:

1. Purge the sampling port sufficiently to allow for a representative sample aliquot.
2. Fill a one liter glass beaker with water from the sample source and allow it to slowly overflow.
3. Open a 40 mL VOA vial and submerge, inverted, into the beaker.
4. Rotate the sample container so that it fills with water.
5. Cap with a Teflon-lined cap while the sample container is still under the water and the water flow is still on to eliminate head space.
6. Once the sealed vial is removed from the container, inverted it and check for bubbles that would indicate headspace.
7. If there are visible bubbles, empty the container and repeat the sampling collection steps 4-6.
8. If there are no visible air bubbles, the outside of the sealed bottle is wiped dry, and the cap is sealed in place with electrical tape.
9. After the vial is sealed, a second (duplicate) sample is collected in the same fashion.
10. Record the date and time of the sample collection for each vial.
11. Analysis should begin within three days of sample collection.

Samples will be analyzed by a commercial analytical laboratory using their published Radon in Water SOP and Method or equivalent, if the method changes. Duplicate samples will be collected in accordance with the commercial laboratory's requirements. Initially, duplicate samples will be collected for all radon samples to assess the sampling technique.

Comment No. 4: Justification for the Frequency of Lixiviant Sampling for Radon.
Strata did not explain and justify the frequency of lixiviant sampling for radon, other than to state that this sampling would occur during the first 6 months of "steady state operation."

Comment: Strata should explain and justify the frequency of lixiviant sampling for radon.

Response to Comment No. 4:

Sampling radon in the injection and production solutions will be conducted initially upon startup. This will include during the conditioning phase (i.e., recirculation of formation water without chemicals). Thereafter radon sampling will be conducted monthly, which will provide a good understanding of the process solution dissolved radon concentrations. As new wellfields are added and operations fluctuate, Strata may observe that there is no continuity. It is possible that variations in the ore body may influence the radon concentrations in the production and injection solutions. Strata will analyze this data to determine when steady-state operations are achieved in relation to radon concentrations in the process solutions. Radon sampling may be conducted less frequent when trending of data is available.

Comment No. 5: Procedures to Determine Effluent Quantities Prior to Steady-state Operations
Strata stated that it would perform measurements "in the first 6 months of steady state operations" but did not explain when it expected "steady state operations" to begin, relative to quantities of radon in air effluents. For example, if steady state operations are assumed to occur no sooner than year 3 or 4 of plant operation, Strata should explain how it will determine effluent quantities in years 1, 2 and 3.

Comment: Strata should explain when steady state operations will begin and what procedures will be used to determine effluent quantities until steady state operations begin.

Response to Comment No. 5:
Strata is not certain when "steady state operations" will begin as this is determined by various factors, as discussed in the response to comment number 4 above. However, Strata commits to performing the same procedures to determine effluent quantities during the initial period of production as those outlined in this attachment and in previously approved submittals for steady state operations.

Comment No. 6: Accounting for Radionuclides in Unmonitored Effluents
Strata did not explain how it would account for radionuclides in effluents from well fields or deep disposal well houses. Regulatory Guide 8.37, "ALARA Levels for Effluents from Materials Facilities," Regulatory Position 3.3, "Unmonitored Effluents," states, "If a licensee has release points for which monitoring is not practicable, the licensee should estimate the magnitude of the unmonitored effluents ... Unmonitored releases may be estimated based on the quantity of material used in these areas or the

number of procedures performed or other appropriate methods. When practicable, unmonitored effluents should not exceed 30% of the total estimated effluent releases." (NRC 1993)

Comment: Strata should explain how it will account for radionuclides in unmonitored effluents, such as those from well fields or deep disposal well houses.

Response to Comment No. 6:
In order to account for the quantity of the principal radionuclides from all point and diffuse sources, Strata commits to undertaking several other effluent monitoring activities than those initially proposed in its' March 1, 2015 letter.

Strata has identified three main sources of effluent from areas outside the Central Processing Plant (CPP). These sources are the header houses, the deep disposal well building, and the production wells in the wellfield. An additional source of effluent would be the potential unplanned release of process fluid in the wellfield.

Radon and Radon Progeny Emissions

In order to account for the quantity of radon and radon progeny from these sources, Strata will conduct surveys of radon concentration in the header houses, deep disposal well building, and at specified wells in the wellfield. Strata will utilize the modified Kusnetz method to conduct the surveys for radon and radon progeny . The surveys will be conducted at least monthly in the header houses and deep disposal well building. Strata will use the radon progeny equilibrium factor of 1, as it is the most conservative value. In regards to the wells, the injection wells have sealed well heads and thus the potential of radon release from the injection wells is minimal. There is the potential for radon release from the production wells, however. Thus Strata will survey 10% of the production wells on a quarterly basis. This method of quarterly representative sampling of production wells has been previously approved for other operators by the NRC as an acceptable method for accounting for radon and radon progeny from well heads.

The concentrations of radon and radon progeny in the air from the surveys conducted in the various header houses will be averaged to obtain an average concentration of radon and radon progeny for the header houses for that month. This average concentration will be multiplied by the design flow rate of the exhaust fans to be used in the header houses to determine the potential activity of radon and radon progeny being discharged from a header house. The number of header houses in operation will then be multiplied by the average emission such that the total emissions of radon and radon progeny from all operating header houses can be estimated. The addition of new header houses will be included in this estimate, using the amount of time that the header house was in operation. For example, if a newly added header house was in operation for only the last month of the time period, then the emissions for only that month will be estimated and added to the total release from all header houses.

The same procedure as used for the header houses will be used for potential radon and radon progeny emissions from the deep disposal well building. Monthly grab samples will be used to obtain a concentration level in the building, and this will be multiplied by the design flow rate of the ventilation.

As discussed above, 10% of the production wells will be sampled quarterly using the modified Kusnetz method. Protective equipment, such as insulting barrels, surrounding the wellhead will be removed and

a sample will be collected at the wellhead to obtain a sample that is representative of the amount of radon being released at the wellhead. Due to the high variability in the emissions rate from the wellhead, it will be assumed that the wellhead is emitting air at a rate of 2 LPM, the rate that the air sampler will pull the sample. This assumption will be a gross overestimation, but will be utilized until and unless proof of the actual emissions rate can be determined. Consistent with the method for estimating emissions from the header houses, the quarterly data obtained from sampling will be averaged so that an average concentration of radon and radon progeny emitted from each wellhead can be estimated. This average concentration of radon will be multiplied by the estimated ventilation rate and the number of production wells to estimate the total emission of radon and radon progeny from the wells.

In the event of an unplanned release of process fluid in the wellfield, Strata will estimate the total volume of solution released using monitoring data (e.g., flow rate of a specific well that is the source of the spill). This volume data will then be used with the most recent radon sampling data for the relevant process solution to determine the total activity released.

Particulate Emissions

In order to account for the quantity of radioactive particulates emitted from sources other than the CPP, Strata will conduct surveys of particulate concentrations in the header houses and the deep disposal well building. Strata will utilize air sampling techniques outlined in the TR Section 5.7.3.1 for air particulate sampling. The surveys will be conducted at least monthly in the header houses and deep disposal well building. The samples obtained will be measured for gross alpha concentration. Radiological characterization of the samples will also be performed semi-annually. The samples will be sent to an outside accredited laboratory and analyzed for the composition of U-Nat, Th-230, Ra-226, Po-210, and Pb-210. The effluent attributed to each radionuclide will be calculated using the method discussed above for radon and radon progeny emissions from the header houses and deep disposal well building, namely the multiplication of the averaged concentrations by the ventilation rate.

In the event of an unplanned release of process fluid in the wellfield, Strata will use the concentrations obtained from the most recent analysis of the relevant process fluids regarding isotopic composition. These concentrations will be multiplied by the volume of process fluid released to estimate particulate effluent from this source.

The surveys described above will be conducted according to approved procedures and in accordance with Strata's Quality Assurance Program. Proper documentation will be made of all surveys and the results will be provided in applicable reports.

Comment No. 7: Description of Operational Livestock and Vegetation Sampling
Strata should reconcile the different commitments in Sections 5.7.7.1.3 and Table 5.7-1 of its Technical Report, and clarify its description of triggers for operational livestock and vegetation sampling. In a revised response, Strata should also address whether a license amendment is needed to reconcile differences between TR Section 5.7.7.1.3 and Table 5.7-1.

Comment: Strata should clarify its description of operational livestock and vegetation sampling in light of commitments already made and staff guidance in Regulatory Guide 4.14, Table 2, regarding acceptable trigger levels.

Response to Comment No. 7:
Strata will follow the commitments outlined in the Technical Report (TR) Section 5.7.7.1.3, and not those commitments made in the TR Table 5.7-1 or Section 1.5 of Attachment 2 to Strata's March 1, 2015 letter. Upon NRC review and verification of this LC, Strata will update TR Table 5.7-1 to reflect this.

Comment No. 8: Deficiencies in Accounting for Radon Progeny in Estimates of Public Dose.
The staff identified the following concerns with Strata's proposed approach:

1. *Measurements of lead-210 at the air sampling stations at the site boundary are not annual average concentrations of radioactive material released in gaseous and liquid effluents at the boundary of the unrestricted area, as described in 10 CFR 20.1302(b)(2)(i). Therefore, the comparison to effluent concentrations of measured lead-210 concentrations at site boundary locations beyond the boundary of the unrestricted area does not demonstrate that public dose limits are met.*
2. *Even if lead-210 concentrations were measured at the boundary of the unrestricted area, lead-210 is not "at the end of the short-lived radon progeny decay train," as stated by Strata. Lead-210 is a long-lived progeny of radon-222 with a half-life of 22 years and is not present in the environment in either secular equilibrium or transient equilibrium with relatively short-lived radon-222 from nearby licensed sources. In fact, assuming radon-222 were present at constant concentrations, lead-210, with its half-life of 22 years, would take about 100 years to reach equilibrium (Eisenbud 1997). Furthermore, as a result of both its long half-life and various mechanisms for removal of dust from the atmosphere (e.g., dry and wet deposition), it is generally not possible to reliably attribute measured lead-210 in air to any nearby source of radon-222. Therefore, lead-210 is not an appropriate "proxy" for short-lived radon progeny emitted from nearby sources.*
3. *For the reason stated above (item 2), the use of MILDOS-AREA to calculate downwind concentrations of lead-210 for comparison to measured values for the first four quarters of plant operation is not valid. Also, the staff has not approved the use of MILDOS-AREA during the period of plant operation to calculate annual public dose for purposes of annual demonstrations of compliance with 10 CFR 20.1301 and 20.1302. As stated in Section 4.2.2 of the Draft Interim Staff Guidance (NRC 2014a), one acceptable approach involves measurements of radon-222 in*

lixiviant water, as proposed by Strata, and use of MILDOS-AREA to estimate downwind concentrations of radon and radon progeny, provided that the licensee also commits to measuring radon or radon progeny in air to verify that predicted concentrations are not exceeded. As described in Section 4.7 of the draft ISG, when feasible, measurements should be performed close enough to the facility that releases from the facility are statistically distinguishable from background.

The staff recognizes that operations at newer ISR facilities may result in annual effluent quantities of radon below that which would result in concentrations of radon near the facility that are statistically distinguishable from background. This may be because newer ISRs: (1) use pressurized down flow columns that are not open to the atmosphere, and; (2) have facility-wide leak rates of radon from all systems containing pressurized lixiviant that are much less than 1% per day, which is the value assumed in the example in Appendix D of NUREG- 1569 (NRC 2003), and which is the value used by many licensees in initial applications. In such cases, a network of radon samplers at the security perimeter of the CPP, which includes at least one sample in each of the eight cardinal and ordinal directions (N, NE, E, SE, etc.), will provide staff the requisite assurance that calculated annual quantities of radon in air effluent are not exceeded.

Acceptable approaches were described by the staff in its draft Interim Staff Guidance (NRC 2014a).

Comment: Strata should revise its plan for accounting for radon progeny in estimates of public dose.

Response to Comment No. 8:
As discussed in the March 1, 2015 letter, Strata will commit to utilizing the approach specified in Section 4.2.2 of NRC's draft Interim Staff Guidance (ISG) FSME-ISG-01 titled "Evaluations of Uranium Recovery Facility Surveys of Radon and Radon Progeny in Air and Demonstrations of Compliance with 10 CFR 20.1301". As discussed in the ISG Section 4.2.2, "If such models are used for transport calculations, NRC staff should ensure that the licensee has measured (or the applicant commits to measuring) radon or radon progeny in air to verify that the predicted concentrations are not exceeded". In order to provide NRC staff with reasonable assurance that the predicted concentrations are not exceeded, Strata will conduct surveys to measure the radon in air.

The main source of potential public dose from radon progeny is anticipated to be from effluent from the Central Processing Plant (CPP). Due to the predicted low concentrations present in the effluent coupled with a variable background, it is not anticipated that the concentrations of radon near the facility will be statistically distinguishable from background when using reasonable current detector technology. Nonetheless, a network of radon samplers at the security perimeter of the CPP will be used as the survey method to verify that the concentrations predicted by the model are not exceeded. The network will include at least one sample in each of the eight cardinal and ordinal directions. Passive alpha-track radon detectors will be used for obtaining these samples, and the detectors will be exchanged quarterly. A map depicting the locations of the sample network is included as Attachment 2. Strata will designate the radon sample locations as "receptor locations" in the MILDOS-AREA model. The calculated concentration levels will then be analyzed with the measured concentration levels to verify that the calculated annual quantities of radon in air effluents are not exceeded.

Strata also currently has an operational environmental monitoring program which includes passive alpha-track detectors. These monitoring locations are located along the permit boundary and at the nearest residences. The data obtained from the passive alpha-track detectors at the nearest residences can also be used to verify the accuracy of the MILDOS-AREA model in estimating the dose received by the residents. As stated in the ISG Section 4.2.1, it will be assumed that the indoor radon concentration due to licensee activities is equal to the outdoor concentration due to licensee activities.

Per the discussion in the ISG Section 4.3, Strata has obtained a general knowledge of the background radon concentrations through the NRC approved preoperational monitoring program. However, as stated in the ISG: "Background measurements should be made during the same time period as the measurements around the facility" due to the potential variability of background radon concentrations for different years. Thus, data obtained from the predetermined background station for the environmental monitoring program will be used to estimate background radon concentrations. This monitoring station will be used as it is the station which is most consistently upwind, as determined from meteorological data. Additionally, the monitoring station is far enough from the facility that the radon concentration will not be significantly affected by radon releases from the facility, while also close enough to the facility that the geology is similar to the site geology and is representative of the monitoring locations. The passive alpha-track detectors used as part of the environmental monitoring program will also be used at the plant monitoring locations so that the same detector used at the background station and nearest residences is used at the unrestricted area boundary.

Strata does not anticipate that there will be issues associated with the uncertainty or Minimum Detectable Concentration (MDC) of the devices, namely the passive alpha-track detectors, as they are currently in use for the preoperational environmental monitoring program. However, if issues do arise, Strata will utilize the techniques outlined in the ISG Section 4.5, such as using a high sensitivity device with a lower MDC or multiple detectors in a single location to lower the uncertainty associated with that location.

Comment No. 9: Annual Occupational Dose in Areas Outside the Central Processing Plant
The information provided by Strata in response to LC 12.7(C) does not address any additional workplace air sampling inside structures outside the CPP (e.g., header houses) to assess internal exposure, or additional external exposure monitoring. Also, the NRC staff has not approved the use of the MILDOS-AREA code for estimating annual occupational dose in License Areas outside the CPP. The staff has previously approved a program for accounting for occupational dose outside the CPP (NRC 2014d).

Comment: Strata should explain how it will account for annual occupational dose received in areas outside the Central Processing Plant (CPP) (i.e., throughout the entire License Area) for employees who are already monitored in accordance with 10 CFR 20.1502 using workplace air sampling and personnel dosimetry.

Response to Comment No. 9:
In regards to accounting for annual occupational dose received through external radiation, dosimeters will be worn by all regular fulltime employees to monitor external radiation per the TR Section 5.7.2.3. The results from the dosimeters will be used to assign dose from external radiation to the workers. As the workers will be instructed to wear their dosimeters at all times while at work, the results from the dosimeters will include exposure to external radiation in areas outside the CPP.

Surveys will be performed by Strata for the internal dosimetry program in areas outside the CPP, as specified in Strata's response to NRC's Comment No. 6 above. Through these surveying activities, Strata will obtain a value for the average concentration levels of particulates and radon and radon progeny present in the wellfield, header houses, and deep disposal well building. The header houses and area of the wellfield designated as a controlled area will be considered the "Wellfield Area". The particulate concentration level for the Wellfield Area will be the average concentration level from surveys in the header houses. The radon and radon progeny concentration level will be the summation of the average concentration level for the header houses with the average concentration level for the well heads. The emissions due to potential process fluid releases will be added to the appropriate category for any spills which have occurred.

As the estimated occupancy times for the deep disposal well building are negligible, the values obtained from the surveys will not be included in the general consideration of annual occupational dose. However, if non-routine work occurs in or around the deep disposal well building then the concentration values obtained can be used in assigning dose received during that work.

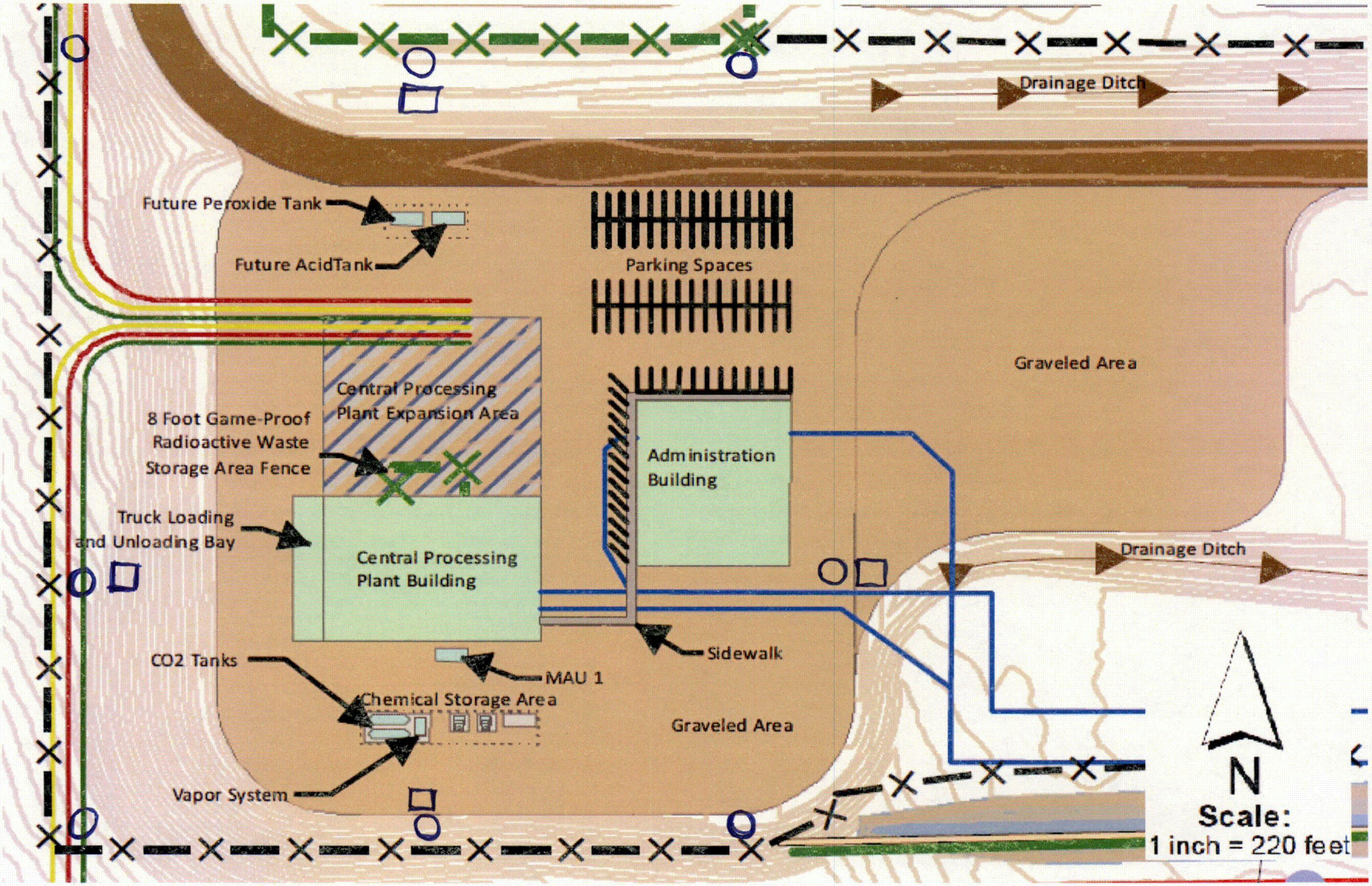
Strata will take monthly air particulate grab samples in the four cardinal directions around the CPP. Samples were chosen to be taken at the four cardinal directions to provide representative data of the concentration levels of particulates in the area around the CPP. The samples will be averaged monthly to determine an average concentration level. The grab sample locations are shown on the map in Attachment 2. The particulate samples will be taken according to procedures outlined in the TR Section 5.7.3.1. Strata has also committed to placing eight (8) passive alpha-track detectors around the perimeter of the CPP to validate the concentration levels of a predictive model for radon and radon progeny. The average monthly concentration levels obtained from the alpha track detectors and the average monthly concentration levels obtained from the particulate samples will be analyzed against the associated levels obtained through surveys within the plant. Although it is anticipated that concentration levels in the plant will be much higher, the average concentration levels from the surveys conducted in the area outside the CPP will be compared to the average concentration levels found in the plant. The most conservative concentration level will be used in determining dose to workers while in the CPP area. This will include workers performing work outside of the CPP building, but within the general area of the building. The "CPP General Area" will be the area designated as the "Controlled Area" in the map attached as Attachment 3.

The TR Sections 5.7.4.1 and 5.7.4.2 outline the calculations to be used for the intake of uranium and radon progeny, respectively, given the average concentration level and occupancy time. Strata will assume that the radon progeny are in 100% equilibrium with the radon. Occupancy factors will be assigned for each work group and will be based off of estimated time spent in the area designated as the "CPP General Area" versus time spent in the area designated as the "Wellfield Area". If it is unclear which area the occupancy factor should be assigned to for a worker, the area with the more conservative level will be used. The TR Section 5.7.4.3 describes the calculations to be used in calculating the annual occupational dose received by employees.

Attachment 2

ROSS URANIUM PROJECT SUA-1601 SOURCE MATERIALS LICENSE
Map Showing Locations for Passive Alpha-track Detectors and Particulate Grab Samples

Figure A-1



Legend: X-X-X = Fencing around entire CPP area; X-X-X (green color) = Fencing around surge Pond 1 Cell 1;

O = Sampling locations for radon; ☐ = Sampling locations for air particulates

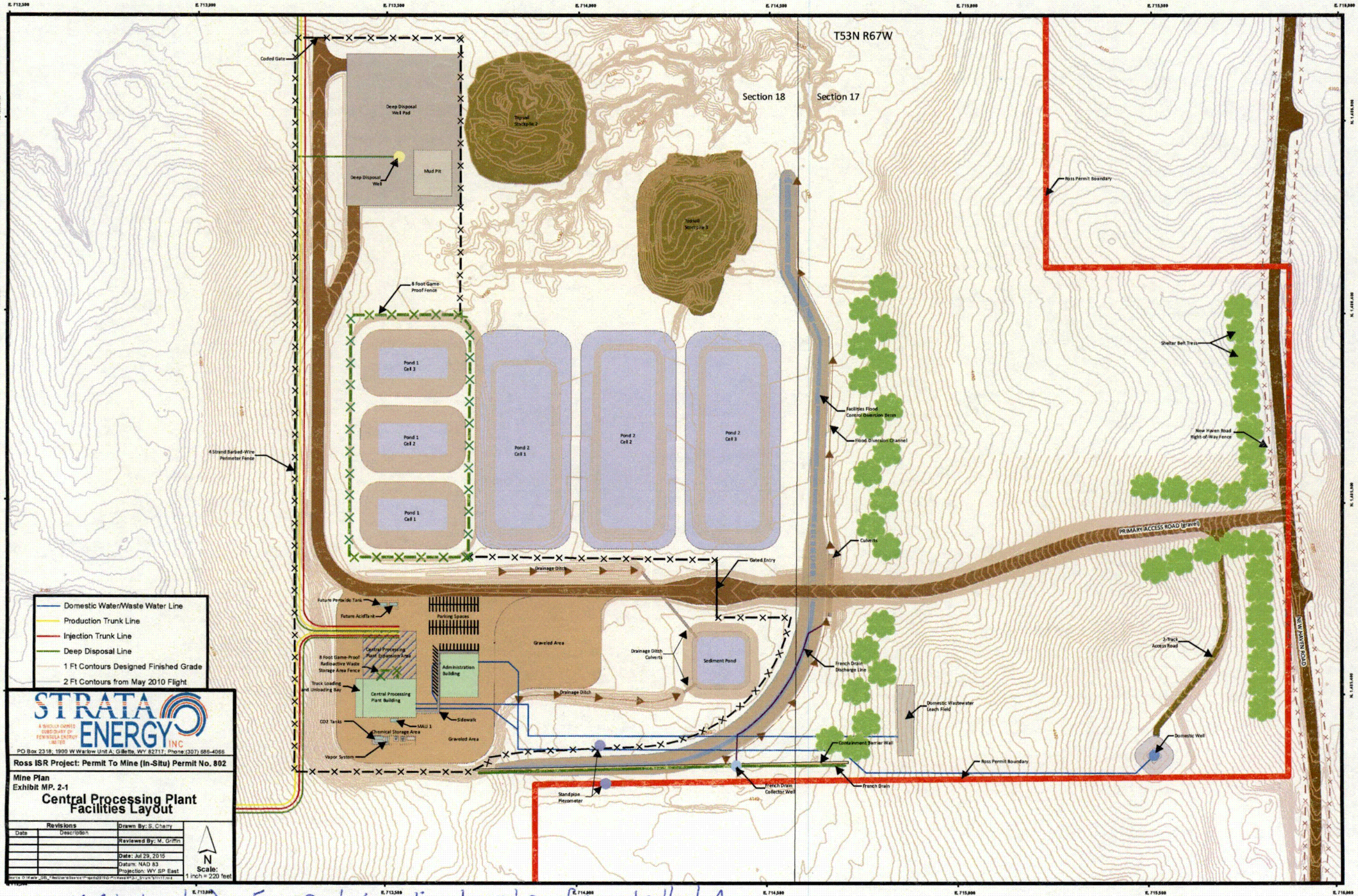
Attachment 3

ROSS URANIUM PROJECT SUA-1601 SOURCE MATERIALS LICENSE
Map Showing Locations of Controlled and Restricted Areas

NOTES:

- The area around the individual wellfields will be fenced and considered a controlled area. The controlled area for a wellfield will be determined upon completion of a wellfield and will be assigned per wellfield. The minimum area designated as a "Controlled Area" for the wellfields will be the area encompassing at least the groundwater monitoring well ring;
- Header houses will be encompassed within the wellfield area and will be designated as "Controlled Areas" as well;
- The deep disposal well building, the area enclosed by the fencing surrounding the surge ponds, the area enclosed by the fencing surrounding the radioactive waste storage area, and any area inside the CPP will be designated as "Restricted Areas";
- The area enclosed by the main fence surrounding the surge ponds, administration building, parking area, and the CPP will be designated as a "Controlled Area"; and
- Any other area than those listed above will be considered an "Unrestricted Area".

Figure A-2



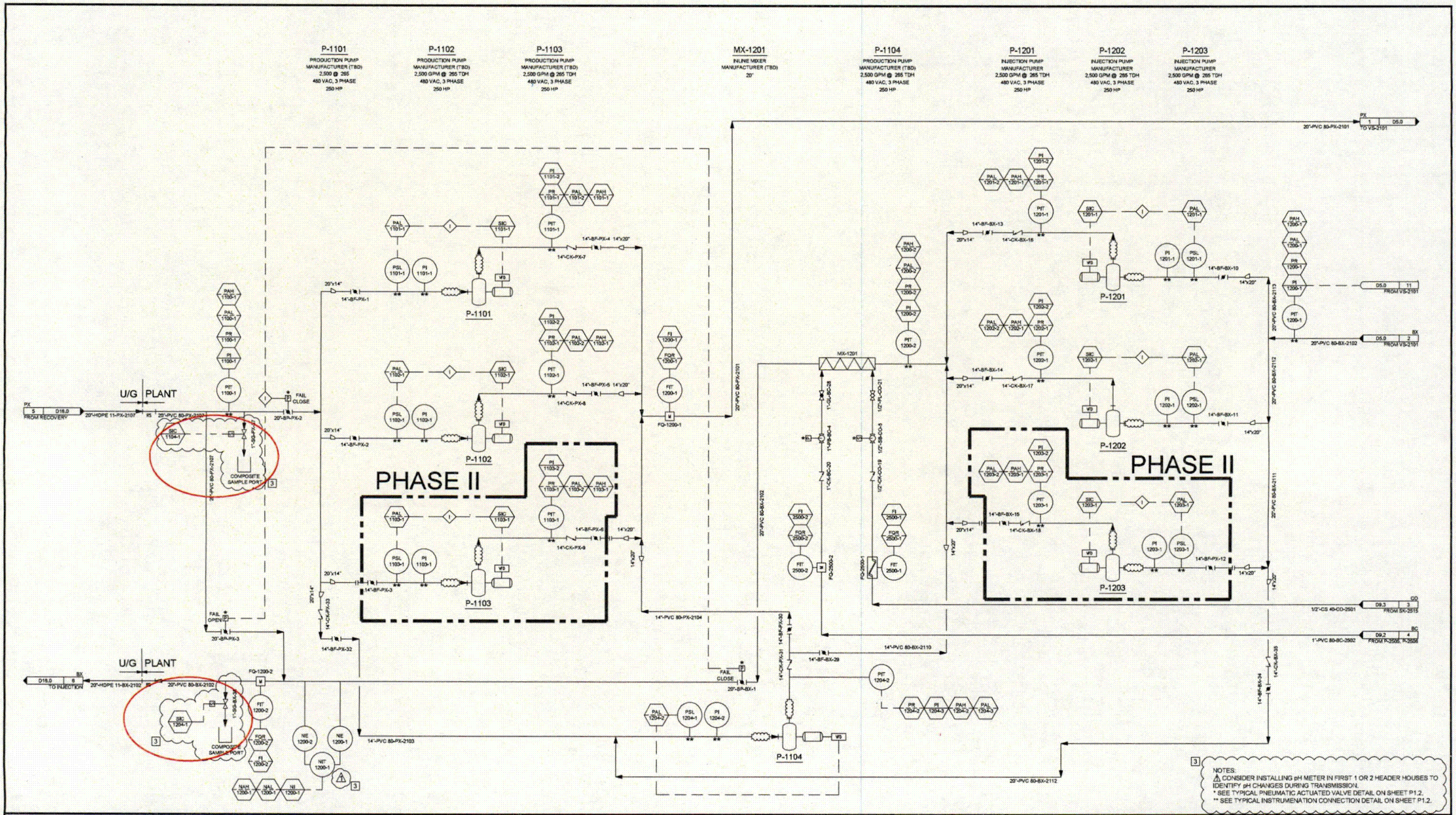
X-X-X (black color) = Fence designating boundary of "controlled Area"
X-X-X (green color) = Fence designating boundary of "Restricted Area"
The interior of the CPP building is also a "Restricted Area"

Attachment 4

ROSS URANIUM PROJECT SUA-1601 SOURCE MATERIALS LICENSE
Map Showing Locations of Sampling Ports for Radon in Water Analysis

Note: The areas circled in red are the proposed locations of the sampling ports for obtaining water samples to analyze the concentration of radon in the water. The sampling ports are those ports which will be used for the general composite sampling.

Figure A-3



DRAWING ISSUE TYPES: PRB = PRE-BID POB = POST-BID IFC = ISSUED FOR CONSTRUCTION POI = POST ISSUED FOR CONSTRUCTION

NO:	DATE	CADD	CHECK	APP'D	ISSUE / REVISION DESCRIPTION	NO:	DATE	CADD	CHECK	APP'D	ISSUE / REVISION DESCRIPTION
A	10/29/12	AJE	STH	BMP	60% OWNER REVIEW						
B	01/31/13	AJE	BAJ	BMP	95% OWNER REVIEW						
0	06/13/13	AJE	BAJ	BMP	100% IFC						
1	02/04/14	AJE	BAJ	BMP	100% IFC						
2	02/06/15	AJE	BAJ	BMP	100% IFC (RAMPED DESIGN)						
3	04/22/15	AJE	BAJ	BMP	100% IFC - EQUIPMENT REVISIONS						

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STRATA ENERGY INC

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