



August 17, 2015

ATTN: Document Control Desk, Director  
Office of Nuclear Material Safety and Safeguards  
U. S. Nuclear Regulatory Commission  
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**Reply to a Notice of Violation: Inspection Report 040-08964/2015-001**

Power Resource's Inc., d/b/a Cameco Resources (Cameco), received a Severity Level IV Notice of Violation (NOV) from the Nuclear Regulatory Commission (NRC) dated July 14, 2015 and received by Cameco on July 21, 2015. The NOV resulted from the failure to accurately include the total quantity of hazardous material on shipping papers. This response is being provided in accordance with 10 CFR 2.201.

The notice of violations provides the following discussion:

*"During the U.S. Nuclear Regulatory Commission (NRC) inspection conducted on April 14-16, 2015, a violation of NRC requirements was identified. In accordance with NRC Enforcement Policy, the violation is listed below.*

*10 CFR 71.5(a) requires, in part, that each licensee who transports licensed material outside of the site of usage, as specified in the NRC license, or where transport is on public highways, or who delivers licensed material to a carrier for transport, shall comply with the applicable requirements of the Department of Transportation regulations in 49 CFR Parts 171 through 180, appropriate to the mode of transport.*

*49 CFR 172.202(a)(5) requires, in part, that the shipping description of a hazardous material on the shipping paper must include the total quantity of hazardous materials covered by the description, as indicated (by mass or volume, or by activity for Class 7 materials), and must include an indication of the applicable unit of measurement.*

*Contrary to the above, from August 8, 2014 through December 11, 2014, the licensee failed to include the total quantity of hazardous material covered by the description indicated by mass, volume, or activity for Class 7 materials on multiple transportation shipping papers. Specifically, 30 shipping papers associated with byproduct waste shipments identified the total activity of each shipment as 5.85 Becquerel (Bq), when the actual quantities shipped were 5.85E+10 Bq."*

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*This is a Severity Level IV violation (Section 6.8)*

**Reason for Violation**

Cameco began cleaning out the sediment in the East Evaporation Pond in July 2014. As part of the cleanout, Cameco rented IP-1 containers with built on lids, lined the containers and the soil was sent to an approved disposal facility.

The shipping containers were each loaded with 13 cubic yards of material. A lab analysis of the material was used to prepare the Bill Of Lading (BOL) that was used for each out going shipment. Once the activity was calculated the amount was transferred incorrectly onto the BOL. Each container was filled with the same yardage and therefor copies were made of the BOL with the incorrect activity. The incorrect BOL was used on all shipments for the duration of the project.

**Corrective Actions**

- All shipment paperwork will be reviewed for accuracy by a trained second party, both preparer and reviewer will initial the bottom of the Bill of Lading.
- All Bills of Lading will be original paperwork with no copies being made and/or stored for use on future shipments.
- Employees responsible for surveying shipments of byproduct material and those responsible for preparing and reviewing Bills of Lading for these shipments will renew their DOT training and the training records will reflect that refresher training.

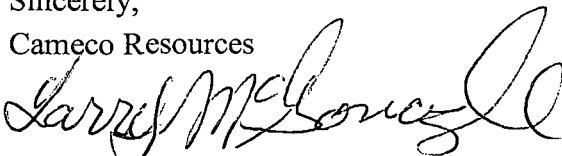
**Date of Full Compliance**

All corrective actions with the exception of the DOT refresher training have been implemented. The DOT refresher training will be completed based on availability of an applicable course for our employees to attend.

If you have any questions or concerns regarding this estimate please feel free to contact Larry McGonagle at 307-333-7655.

Sincerely,

Cameco Resources



Larry McGonagle

Division SHEQ Manger