

Lowman, Donald

From: Jim Viellenave <jviellenave@auc-llc.com>
Sent: Monday, December 12, 2016 1:57 PM
To: Lowman, Donald
Cc: Leland Huffman; Dan Dowers
Subject: [External_Sender] RE: Per our discussion...

Don.

We've had a chance to review the Strata document and find the revised License Condition 12.7 to be acceptable.

AUC can now state that it is agreement with all of the License Conditions for the Reno Creek Project.

Thanks.

Jim Viellenave
President
AUC LLC
1536 Cole Blvd.
Suite 230
Lakewood CO 80401
P: 303-953-7975
F: 303-953-7994
M: 303-884-9208
jviellenave@auc-llc.com

From: Lowman, Donald [mailto:Donald.Lowman@nrc.gov]
Sent: Thursday, December 08, 2016 10:26 AM
To: Jim Viellenave
Subject: Per our discussion...

Please review License Condition 12.7 (see below). As mentioned on the phone, Condition 12.7 was revised after you provided comments via email on September 13, 2016 (ML16265A043).

Draft License:

- 12.7 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 radiation indicative of contamination on personnel exiting restricted areas and to detect beta-gamma radiation indicative of contamination in unrestricted and restricted areas. The licensee shall provide, for NRC staff review and verification, the surface contamination detection capability (scan minimum detectable concentration (MDC)) of the radiation survey meters used in surveys of personnel contamination and for releasing equipment materials to unrestricted use consistent with the limits described in "Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use or Termination of Licenses for Byproduct, Source, and Special Nuclear Material" (ADAMS Accession Number ML003745526) and the methodologies described in NUREG-1507 and NUREG-1575. In the scanning mode, the detection capability for any expected alpha and beta radiation shall be provided using the term disintegrations per minute (dpm) per 100 square centimeters (cm²).

Revised Draft License:

- 12.7 The licensee shall submit a survey program for NRC Headquarters staff review that meets the requirements of 10 CFR Part 20, Subpart F to detect beta-gamma radiation indicative of contamination on personnel exiting restricted areas and to detect beta-gamma radiation indicative of contamination in unrestricted and restricted areas. The survey program shall contain the surface contamination detection capability (scan minimum detectable concentration (MDC)) of the radiation survey meters used in surveys of personnel contamination and for releasing equipment and materials to unrestricted areas, or for unrestricted use, consistent with the limits described in "Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use or Termination of Licenses for Byproduct, Source, and Special Nuclear Material" (ADAMS Accession Number ML003745526) and the methodologies described in NUREG-1507 and NUREG-1575. In the scanning mode, the detection capability for any expected alpha and beta radiation shall be provided using the term disintegrations per minute (dpm) per 100 square centimeters (cm²). Additionally, the survey program shall be modeled after a program previously approved by the NRC. The licensee shall receive written verification from NRC Headquarters staff on the requirements specified in this license condition prior to the NRC staff scheduling a preoperational inspection.

Also, language was added to the SER to coincide with the revised draft license condition 12.7 (this language is found on page 5-33 of the SER):

The staff determined that a survey program for beta-gamma contamination for personnel (and equipment) exiting from restricted areas that meets the contamination limits as described in NRC "Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use or Termination of Licenses for Byproduct, Source, and Special Nuclear Material (NRC, 1993c) and the methodologies described in NUREG-1507 and NUREG-1575 will satisfactorily comply with NRC requirements. Based on the staff's review of RAI-49, the staff determined that the applicant will provide a written overview of a program meeting this criteria before the pre-operational inspection. The program overview may be deemed acceptable if it is consistent with the "Beta-Gamma Contamination Control Program" found in a Strata Energy letter to the NRC dated October 28, 2015 (Strata, 2015).

Please review the above and provide me with an email stating you are in agreement with *all* Licensing Conditions.

Thanks,

Don Lowman

Project Manager
U.S. Nuclear Regulatory Commission
NMSS/DSFM/URLB
301.415.5452