



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
WASHINGTON, D.C. 20555-0001

August 27, 2018

Mr. Royal Pond  
Manager of Health, Safety, and  
Environment/Radiation Safety Officer  
Strata Energy, Inc.  
2929 New Haven Road  
Oshoto, WY 82721

**SUBJECT: CLARIFICATION OF RESPONSES TO PREOPERATIONAL LICENSE  
CONDITIONS REGARDING THE OCCUPATIONAL EXTERNAL RADIATION  
EXPOSURE MONITORING PROGRAM AT THE ROSS IN SITU RECOVERY  
PROJECT, CROOK COUNTY, WYOMING**

Dear Mr. Pond:

I am responding to Strata Energy, Inc.'s (Strata's) letter to the U.S. Nuclear Regulatory Commission (NRC), dated August 7, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18221A544), providing a clarification to Strata's external exposure monitoring program.

By letter dated July 13, 2018 (ADAMS Accession No. ML18183A267), the NRC requested information from Strata regarding its occupational external radiation exposure monitoring program. Specifically, the NRC requested Strata provide the results of its Safety and Environmental Review Panel (SERP) evaluation of changes made to its external radiation exposure monitoring program (SERP 17-6) in light of its previous commitments to issue dosimeters to all regular full-time employees. Strata provided the evaluation of SERP 17-6 in an e-mail dated August 2, 2018 (ADAMS Accession No. ML18214A320). In addition, by letter dated August 7, 2018 (ADAMS Accession No. ML18221A544), Strata indicated that an incorrect reference was made in its response to an NRC comment on License Condition (LC) 12.7 (refer to the reference "TR Section 5.7.2.3" in Response to Comment No. 9 of ADAMS Accession No. ML15224B400). Strata stated that the correct reference should have been its response to NRC comments on the submittal for LC 12.9 (ADAMS Accession No. ML15219A188).

In its submittal for LC 12.9, Strata described how, after the first year of monitoring, it will analyze its exposure monitoring program and assess compliance with 10 CFR Part 20, Subpart C, Occupational Dose Limits. By letter dated October 15, 2015 (ADAMS Accession No. ML15278A123), the NRC notified Strata that the procedures submitted in accordance with LC 12.9 will ensure that unmonitored employees will not exceed 10 percent of the dose limits in 10 CFR Part 20, Subpart C. In an e-mail dated May 22, 2018, Strata provided the NRC with an example demonstrating its analysis of occupational external radiation exposure monitoring (ADAMS Accession No. ML18144A812). In addition, Strata's dosimetry data for calendar year 2016 was reviewed by the NRC inspectors in August 2017 (ADAMS Accession No. ML17264A428) with no problems noted.

As the NRC has reviewed, and agreed with, Strata's methodologies for keeping occupational doses within regulatory limits, the NRC finds no reason to require Strata to adhere to an incorrect reference that refers to an outdated description of its external radiation exposure monitoring program. Therefore, the NRC finds that replacing the reference "TR Section 5.7.2.3" in its response to LC 12.7 with a reference to its submittal for LC 12.9 (ADAMS Accession No. ML15219A188) acceptable.

In accordance with Title 10 of the *Code of Federal Regulations* Part 2.390 of the NRC's "Agency Rules of Practice and Procedure" a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's ADAMS. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions concerning the above, please contact Ronald A. Burrows at (301) 415-6443 or via email at [Ronald.Burrows@nrc.gov](mailto:Ronald.Burrows@nrc.gov).

Sincerely,

/RA/

Ronald A. Burrows, Project Manager  
Uranium Recovery Licensing Branch  
Division of Decommissioning, Uranium Recovery  
and Waste Programs  
Office of Nuclear Material Safety  
and Safeguards

Docket No.: 040-09091  
License No.: SUA-1601

cc: B.J. Kristiansen, WDEQ

R. Pond

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**ADAMS Accession No.: ML18229A043**

**\*via email**

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