

INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM
QUESTIONNAIRE

Reporting Period:

- 1. December 14, 2017 – September 19, 2019 Technical Quality of Incidents and Allegation Activities and Compatibility Requirement.**
- 2. August 1, 2015 – September 13, 2019: all other indicators**

Note: If there has been no change in the response to a specific question since the last IMPEP questionnaire, the State or Region may copy the previous answer, if appropriate.

A. GENERAL

1. Please prepare a summary of the status of the State's or Region's actions taken in response to each of the open recommendations from previous IMPEP reviews.

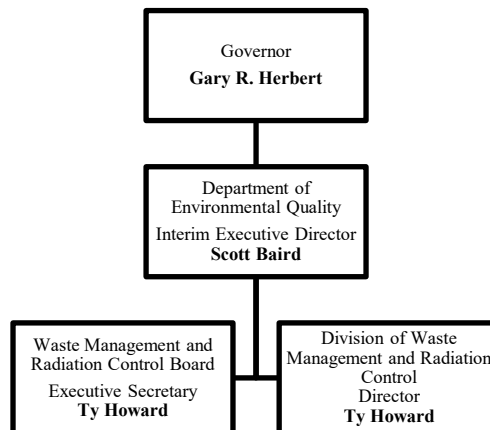
All recommendations from the 2015 IMPEP review were acted on and were addressed in the 2017 periodic review and report. No open recommendations currently exist.

B. COMMON PERFORMANCE INDICATORS

I. Technical Staffing and Training

2. Please provide the following organization charts, including names and positions:

- (a) A chart showing positions from the Governor down to the Radiation Control Program Director;



¹ Estimated burden per response to comply with this voluntary collection request: 53 hours. Forward comments regarding burden estimate to the Records Management Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0183), Office of Management and Budget, Washington, DC 20503. If an information collection does not display a currently valid OMB control number, NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

Name	Position	Area of Effort	FTE%
Bishop, Charlie	Environmental Scientist III	Low-level waste	1.00
Carney, Kevin	Environmental Scientist III	Low-level waste	1.00
Boone, Eric	Environmental Engineer III	Low-level waste Uranium Mills	0.90 <u>0.10</u> 1.00
Butler, Tim	Environmental Scientist III	Radioactive materials inspection/licensing	1.00
Craig, Bill	Environmental Scientist III	Low-level waste Emergency Response (RSO) Instrument calibration and repair	0.70 0.10 <u>0.20</u> 1.00
Christoffersen, Carlee	Environmental Program Coordinator	Generator site access Not related to Radiation Program	0.20 <u>0.80</u> 1.00
Edwards, David	Environmental Scientist III	Low-level waste	1.00
Esser, David	Environmental Engineer III	Low-level waste	1.00
Fausto, Jule	Environmental Scientist III	Generator site access	1.00
Gabert, Helge	Environmental Scientist III	Low-level waste Uranium Mills Not related to Radiation Program	0.70 0.10 <u>0.20</u> 1.00
Galloway, Gwyn	Environmental Scientist III	Radioactive Materials Uranium Mills	0.90 <u>0.10</u> 1.00
Goble, Phil	Environmental Manager I	Uranium Mills Radioactive Materials U mills - Title I (groundwater)	0.50 0.45 <u>0.05</u> 1.00
Griffin, Philip	Environmental Scientist III	Radioactive materials inspection/licensing	1.00
Henderson, Dean	Environmental Scientist III (All Groundwater)	Uranium Mills	1.00

Howard, Ty	Division Director	Low-level waste Radioactive materials Uranium Mills Generator site access Not related to Radiation Program	0.30 0.05 0.05 0.01 <u>0.59</u> 1.00
Johnson, Ryan	Environmental Scientist III	Uranium Mills Radioactive Materials	0.95 <u>0.05</u> 1.00
Lundberg, Rusty	Deputy Director	Low-level waste Radioactive materials Uranium Mills Not related to Radiation Program	0.40 0.05 0.05 <u>0.55</u> 1.00
Mickelson, Heather	Environmental Engineer III	Uranium Mills Corrective Action	0.25 <u>0.75</u> 1.00
Rushing, Tom	Environmental Scientist III (All Groundwater)	Uranium Mills U mills - Title I	0.90 <u>0.10</u> 1.00
Russell Topham	Environmental Engineer III	Uranium Mills	1.00
Verbica, Don	Environmental Manager I	Low-level waste Generator site access Mixed waste Not related to Radiation Program	0.85 0.10 0.03 <u>0.02</u> 1.00
Spencer Wickham	Environmental Scientist III	Radioactive materials inspection/licensing	1.00
Otis Willoughby	Environmental Scientist III	Low-level waste Mixed waste	0.80 <u>0.20</u> 1.00

If consultants were used to carry out the program's radioactive materials responsibilities, include their efforts. The table heading should be:

Name Position Area of Effort FTE%

Consultants provide technical assistance to the Division of Waste Management and Radiation Control staff for various license renewal or amendment application reviews involving EnergySolutions LLC or Energy Fuels Resources.

Fiscal Year	Consultant Hours
2015 (07/01/2014 - 06/30/2015)	370.55 (SC&A)
2016 (07/01/2015 - 06/30/2016)	1,265.25 (SC&A)
2017 (07/01/2016 - 06/30/2017)	211.55 (SC&A)
2018 (07/01/2017 - 06/30/2018)	2,405.20 (SC&A)
2019 (07/01/2018 - 06/30/2019)	2,564.10 (SC&A)

4. Please provide a listing of all new professional personnel hired into your radioactive materials program since the last review, indicate the date of hire; the degree(s) they received, if applicable; additional training; and years of experience in health physics or other disciplines, as appropriate.

Tim Butler (Radioactive Materials)

EDUCATION:

Bachelor of Science, Physics, Louisiana Tech University, 2010

RELATED WORK EXPERIENCE:

Mr. Butler has more than eight years working as a health physicist. He worked five years as an inspector with the State of Louisiana Agreement State Program (Department of Environmental Quality). He has worked for the past three years as an inspector and license reviewer for the Utah Division of Waste Management and Radiation Control

SHORT COURSES: Mr. Butler has completed each invitational training the NRC has to offer to NRC Agreement states.

PROFESSIONAL AFFILIATIONS:

None

PROFESSIONAL REGISTRATION:

None

Helge Gabert (Low-Level Waste)

EDUCATION:

Masters in Hydrology, University of Freiburg, Germany (1985)

RELATED WORK EXPERIENCE:

24 years at Utah DEQ in Hazardous Waste, five years of which were in the low-level radioactive waste program as project manager for the EnergySolutions, Clive, Depleted Uranium Performance Assessment.

SHORT COURSES:

Analyzing Environmental Data with R, Statistics Course, RESRAD Training, Uranium Recovery, Introduction to Health Physics

PROFESSIONAL AFFILIATIONS:

National Groundwater Association (NGWA)

PROFESSIONAL REGISTRATION:

Professional Geologist, licensed through State of Utah.

Heather Mickelson (Uranium Mills)

EDUCATION:

Bachelor of Science, Geological Engineering, University of Utah, 2002

Bachelor of Science, Environmental Earth Science, University of Utah, 2002

Master of Science, Environmental Engineering, Utah State University, 2007

Master of Business Administration, University of Utah, 2013

RELATED WORK EXPERIENCE: 12 years working in the Environmental Field, including the last three years in the Utah Division of Waste Management and Radiation Control.

SHORT COURSES:

Fundamentals of Health Physics, Fundamentals of Health Physics Lab, Licensing Procedures, Inspection Procedures, Health Physics for Uranium Recovery, MILDOSE-Area Workshop, Air Sampling for Radioactive Materials, Root Cause/Incident Investigation.

PROFESSIONAL AFFILIATIONS:

Air and Waste Management Association

PROFESSIONAL REGISTRATION:

Professional Engineer, licensed through State of Utah.

Professional Geologist, licensed through State of Utah.

Otis Willoughby (Low-Level Waste)

EDUCATION:

Brigham Young University, M.S. Geology, April 1991.

Brigham Young University, B.S. Geology, April 1986.

Brigham Young University, B.A. German, April 1986.

RELATED WORK EXPERIENCE:

28 years working in the Environmental Field working in the Utah Division of Solid and Hazardous Waste, including the last five years in the Utah Division of Waste Management and Radiation Control when the Division of Solid and Hazardous Waste and the Division of Radiation Control were combined

SHORT COURSES:

Air Sampling for Radioactive Sources, Environmental Monitoring, Health Physics for Uranium Recovery, Inspection Procedures, Introductory Health Physics, Root Cause Analysis, Fundamental Health Physics, Licensing Procedures, Advanced Environmental Crimes.

PROFESSIONAL AFFILIATIONS:

National Groundwater Association (NGWA)

PROFESSIONAL REGISTRATION:

Professional Geologist, licensed through State of Utah.

Don Verbica (Low-Level Waste)

EDUCATION:

Bachelor of Science, Geology, Brigham Young University, 1982

RELATED WORK EXPERIENCE:

35 years working in the Environmental Field working in the Utah Division of Solid and Hazardous Waste, including the last five years in the Utah Division of Waste Management and Radiation Control when the Division of Solid and Hazardous Waste and the Division of Radiation Control were combined

SHORT COURSES:

Introductory Health Physics, Fundamentals of Health Physics, Fundamentals of Health Physics Lab, Licensing Procedures, Inspection Procedures, Health Physics for Uranium Recovery, Environmental Monitoring for Radioactive Materials, Transportation of Radioactive Material, and Alternate Concentration Limit Workshop.

PROFESSIONAL AFFILIATIONS:

National Groundwater Association (NGWA)

PROFESSIONAL REGISTRATION:

Professional Geologist, licensed through State of Utah.

5. Please list all professional staff who have not yet met the qualification requirements for a radioactive materials license reviewer or inspector. For each, list the courses or equivalent training/experience they need and a tentative schedule for completion of these requirements.

All current license reviewer / materials inspection staff have met the qualification requirements.

6. Identify any changes to your qualification and training procedure that occurred during the review period.

Since the last IMPEP review was conducted in 2015, the DWMRC has implemented a tracking system for the hours of applicable refresher/continuing education received by staff members associated with licensing and inspection of radioactive materials. Other than the implementation of this tracking, the DWMRC has not changed the core training and experience required by each staff member. Core training and experience required for each applicable staff member are

determined based on the associated duties and responsibilities assigned to each staff member as related to the regulation of licensed radioactive materials in the State of Utah.

7. Please identify the technical staff that left your radioactive materials program during the review period and indicate the date they left.

Eleanor Divver (Indoor Radon) (July 1, 2015), Connie Rauen (February 18, 2016), Mike Givens (April 8, 2016), Scott Anderson (Division Director), (December 28, 2019), Boyd Imai (April 29, 2019).

8. List any vacant positions in your radioactive materials program, the length of time each position has been vacant, and a brief summary of efforts to fill the vacancy.

No vacancies in existing positions.

9. For Agreement States, does your program have an oversight board or committee which provides direction to the program and is composed of licensees and/or members of the public? If so, please describe the procedures used to avoid any potential conflict of interest.

When the Department of Environmental Quality was created in 1991, the Radiation Control Board was also established. This board was granted all administrative rulemaking authority for Utah's radiation control programs. In 2015, the Utah Legislature passed and the governor signed a bill that consolidated the Division of Solid and Hazardous Waste and the Division of Radiation Control into the Division of Waste Management and Radiation Control. The new division began on July 1, 2015. With this organizational change, the Waste Management and Radiation Control Board was also created, resulting from a similar consolidation of the previous Solid and Hazardous Waste Control Board and the Radiation Control Board.

Board members are appointed by the governor and confirmed by the state senate. The Waste Management and Radiation Control Board is granted rulemaking and certain administrative functions, including conducting various public hearings as necessary. State law specifies the makeup of the board to include designated representatives of various government, private organizations, and industry (A complete list is provided below). Board members serve a four-year term and may be reappointed by the governor and confirmed by the state senate for an additional term.

State law governs the need for board members to comply with state conflict of interest policies and ethics standards. Therefore, board members who have, or may have, a conflict of interest in any issue before the board, should declare the conflict, verbally, prior to entering into a discussion of the issue. Board members who have a conflict of interest in a motion to be voted on by the board should abstain from voting on the motion. Upon appointment to the Waste Management and Radiation Control Board, each board member is required to complete a written Conflict of Interest statement. If a board member has no known conflicts of interest, he or she is to so state on the written statement. The member's individual statements are to be updated as necessary. Other required qualifications include:

- Utah resident
- Knowledgeable about solid and hazardous waste matters and radiation safety and protection as evidenced by a professional degree, professional accreditation, or

- documented experience
- Regular attendance of board meetings

The board consists of the following 12 members:

- Executive Director of the Department of Environmental Quality (or other DEQ employee designated by the Executive Director)
- Utah-licensed engineer
- Two non-federal government representatives
- Manufacturing, mining, or fuel industry
- Private solid or hazardous waste industry
- Private hazardous waste recovery industry
- Radioactive waste management industry
- Uranium milling industry
- Environmental nongovernmental organization or nongovernmental organization that represents community interests
- Licensed medical doctor or dentist
- Medical or health physicist or professional employed in the field of radiation safety

II. Status of Materials Inspection Program

10. Please identify individual licensees or categories of licensees the State is inspecting less frequently than called for in NRC's Inspection Manual Chapter (IMC) 2800 and explain the reason for the difference. The list only needs to include the following information: license category or licensee name and license number, your inspection interval, and rationale for the difference.

The Division of Waste Management and Radiation Control does not have any radioactive material license categories that have an inspection frequency less than the frequency identified in NRC's Inspection Manual Chapter (IMC) 2800. Many of the radioactive material license categories within the State of Utah are inspected more frequently than specified in IMC 2800.

11. Please provide the number of routine inspections of Priority 1, 2, and 3 licensees, as defined in IMC 2800 and the number of initial inspections that were completed during each year of the review period.

Inspections of NRC Priority 1-3		
Timeframe	Routine	Initial
08/1/2015 - 12-31/2015	12	3
01/01/2016 - 12/31/2016	33	16
01/01/2017 - 12/31/2017	33	5
01/01/2018 - 12/31/2018	33	10
01/01/2019 - 08/01/2019	10	1

12. Please submit a table, or a computer printout, that identifies inspections of Priority 1, 2, and 3 licensees and initial inspections that were conducted overdue.

At a minimum, the list should include the following information for each inspection that was conducted overdue during the review period:

- (1) Licensee Name
- (2) License Number
- (3) Priority (IMC 2800)
- (4) Last inspection date or license issuance date, if initial inspection
- (5) Date Due
- (6) Date Performed
- (7) Amount of Time Overdue
- (8) Date inspection findings issued

Licensee	License Number	NRC Priority	Last Inspection or Date License Issued	Date Due (Plus Extra Time)	Date Performed	Amount of Time Overdue (days)	Date Inspection Findings Issued
Century Geophysical, LLC	UT 2500557	3	4/23/2015	4/23/2016 (4/23/2016)	1/24/2017 Closeout: 2/8/2017	278	3/7/2017
Salt Lake Clinic	UT 1800277	3	7/12/2012	7/12/2015 (7/12/2016)	12/01/2016	142	12/31/2016
Western Technologies, Inc.	UT 1800575	1	4/21/2015	4/21/2016 (10/21/2016)	11/04/2016	14	12/1/2016

13. Please submit a table or computer printout that identifies any Priority 1, 2, and 3 licensees and initial inspections that are currently overdue, per IMC 2800. At a minimum, the list should include the same information for each overdue inspection provided for Question 12 plus your action plan for completing the inspection. Also include your plan for completing the overdue inspections.

There are no inspections overdue when comparing inspection due dates with the inspection intervals allowed by the NRC. The inspection interval is determined by the NRC Priority associated with the license and may exceed that interval by 50 % or 1 year depending on the assigned priority level.

14. Please provide the number of reciprocity licensees that were candidates for inspection per year as described in IMC 1220 and indicate the number of reciprocity inspections of

candidate licensees that were completed each year during the review period.

Year	Candidate Licensees	Reciprocity Inspections Completed
08/1/2015 - 12-31/2015	5	1
2016	11	8
2017	6	4
2018	8	4
1/01/2019 - 08/01/2019	9	5

III. Technical Quality of Inspections

15. What, if any, changes were made to your written inspection procedures during the reporting period?

During the given IMPEP interval, the DWMRC's written inspection procedures were modified as follows:

- The NRC modified their inspection frequency intervals from the assigned inspection priority $\pm 25\%$ of the inspection priority to an interval of the priority $+ 50\%$ of the inspection priority for those inspections assigned Priorities I or II.
- Additionally, the inspection intervals for those inspections assigned Priorities III, IV, or V, the inspection intervals were modified from the assigned inspection priority $\pm 25\%$ of the inspection priority to an interval of the priority $+ 1$ year.
- Changes were made to the inspection procedures to address changes necessary due to the DWMRC's adoption of the requirements in 10 CFR 37.

16. Prepare a table showing the number and types of supervisory accompaniments made during the review period. Include:

Inspector Supervisor License Category Date

Inspector	Supervisor	License Category	Date
Mike Givens	Phil Goble	3-n.1	8/1/2015
Tim Butler	Phil Goble	3-m.2	9/7/2016
Tim Butler	Phil Goble	2-e	2/17/2017
Tim Butler	Phil Goble	7-c	8/30/2018
Gwyn Galloway	Phil Goble	7-c	11/23/2015
Philip Griffin	Phil Goble	2-e	11/10/2015
Philip Griffin	Phil Goble	3-k.0	12/8/2016
Philip Griffin	Phil Goble	7-b.1A	3/7/2017

Philip Griffin	Phil Goble	7-b.1B	5/30/2018
Philip Griffin	Phil Goble	3-d.2	5/9/2019
Spencer Wickham	Phil Goble	3-l.1	8/13/2015
Spencer Wickham	Phil Goble	3-b.1	6/22/2016
Spencer Wickham	Phil Goble	3-m.4	7/10/2017
Spencer Wickham	Phil Goble	3-1.2A	4/19/2018

17. Describe or provide an update on your instrumentation, methods of calibration, and laboratory capabilities. Are all instruments properly calibrated at the present time? Were there sufficient calibrated instruments available throughout the review period?

Exposure rate instruments and dosimeters are calibrated on-site using a one-curie cesium-137 source. The calculated source intensity is adjusted for decay prior to each calibration session. Each instrument is placed on a small table at a specified distance from the source to evaluate the desired reading on multiple scales or decades. An electronic pulser is used to check electronic counting circuits. Instruments have also been sent to the manufacturer for calibration.

Contamination instruments are calibrated using a variety of beta or alpha sources. Sources are chosen based on energy and activity. Ratemeters or scalers are calibrated with specific probes. An electronic pulser is also used to check high voltage settings, threshold settings, instrument linearity, and digital displays.

All instruments currently used by inspectors are properly calibrated and there were sufficient calibrated instruments available through the review period. Our instrument calibration records will be available for the IMPEP team members to review.

IV. Technical Quality of Licensing Actions

18. How many specific radioactive material licenses does your program regulate at this time?

As of August 1, 2019, the Division regulates 192 active radioactive material licenses.

19. Please identify any major, unusual, or complex licenses which were issued, received a major amendment, were terminated, decommissioned, submitted a bankruptcy notification or renewed in this period.

Major, Unusual, or Complex Licenses Issued

UT 0200610 Corrine City Corporation
UT 1800609 Companion Curie Therapy, LLC
UT 2900599 Petersen, Inc.

Major, Unusual, or Complex Licenses Amended

UT 1800494 IHC Health Services, Inc. d.b.a. Intermountain Medical Center
UT 1800102 IHC Health Services, Inc. d.b.a. LDS Hospital
UT 1800074 Isomedix Operations, Inc.
UT 1800001 The University of Utah (Broad Scope)
UT 2900149 Weber State University

UT 2500081 Brigham Young University
 UT 1800145 The University of Utah (Intermountain Radiopharmacy)
 UT 1800458 The University of Utah (Cyclotron Radiopharmacy)
 UT 2900599 Petersen, Inc.
 UT 1800225 Cardinal Health Nuclear Pharmacy Services
Major, Unusual, or Complex Licenses Terminated
 UT 2700464 Nuclear Apothecary, Inc.
 UT 1800408 American Red Cross Blood Services

Major, Unusual, or Complex Licenses Decommissioned

None

Major, Unusual, or Complex Licenses with a Bankruptcy Notification

UT 2900176 Westinghouse Electric (Company sold)

Major, Unusual, or Complex Licenses Renewed

No Major, Unusual, or Complex Licenses Renewed.

20. Discuss any variances in licensing policies and procedures or exemptions from the regulations granted during the review period.

A request for a variance from the requirements of R313-19-100(5)(b) was made by The University of Utah, UT 1800001, (U of U) for the transport of small quantities of radioactive waste created in laboratories on the U of U campus. The waste would contain levels of radioactivity that would not require specific packaging, labeling, bill of lading, and emergency procedures for transport under DOT requirements. However, even though the DOT requirements would not be applicable under normal circumstances, the requirements in R313-19-100(5)(b), would require a licensee to treat the waste as if DOT requirements applied to the waste. The licensee requested an exemption from the requirements so that the licensee would not be required to package, label, mark, provide shipping papers or emergency information as if the DOT requirements applied when the waste is transported from the laboratories on campus to the licensee's waste building on campus. The waste would not be transported on public highways, but would either be transported by State employees, in a State owned and operated vehicle, on surface streets on campus or would simply be carried by State employees from the laboratory to the waste building. The Board granted the request.

A request was made to allow the decay-in-storage (DIS) of radioactive waste from Lu-177 treatments that potentially contains a small percentage of Lu-177m as an impurity in the treatment. Lu-177m has a half-life of about 161 days. License Condition 25 of IHC Health Services, Inc. d.b.a. Intermountain Medical Center's (IMC) Utah Radioactive Materials License Number - UT 1800494 and 10 CFR 35.92, restricted the licensee from holding radioactive materials with a half-life of greater than 120 days for DIS and would require waste from medical treatments involving Lu-177/Lu-177m to be disposed as low level radioactive waste. This was also required by the provisions of R313-32 (incorporating 10 CFR 35.92 by reference). IMC provided specific information to demonstrate that the licensee had sufficient storage for the additional waste, would securely and safely store the radioactive waste during the DIS, and would appropriately survey the radioactive waste to discern that it was indistinguishable from background prior to disposal as normal waste. NRC has approved of the storage of wastes with half-lives greater than 120 days if these conditions were met in the past. Therefore, the exception was granted in this instance.

Additionally, due to the anticipated increase in requests to allow DIS for medical facilities using Lu-177/Lu-177m for certain cancer treatments, the Division has proposed rulemaking to allow DIS

for waste containing radioactive materials with half-lives greater than 120 days but less than 175 days in the proposed modifications to R313-32 of the Utah Administrative Code which is currently out for public comment. If the proposed requirement is passed, a variance for DIS of waste from Lu-177 treatments will not be necessary; however, the licensee will need to request an amendment to their license.

21. What, if any, changes were made in your written licensing procedures (new procedures, updates, policy memoranda, etc.) during the reporting period?

In 2017, the Division's Administrative Procedures were updated to finalize changes to the policies and procedures made when the Divisions of "Solid and Hazardous Waste" and "Radiation Control" were merged to form the Division of Waste Management and Radiation Control. The licensing procedures were modified to update the use of E-Docs (a document tracking system) in the processing of license actions and to include requirements found in R313-37 (incorporating 10 CFR Part 37 by reference) where applicable. The Division's name was updated to reflect the new Division's name.

With recent revisions to the Division's management, the Division's Administrative Procedures are currently undergoing a review to ensure that any recent modifications to procedures or protocols are reflected in the Administrative Procedures. Any necessary modifications should be completed before the State of Utah's IMPEP review in September 2019.

22. Identify by licensee name and license number any renewal applications that have been pending for one year or more. Please indicate why these reviews have been delayed and describe your action plan to reduce the backlog.

GammaWest Brachytherapy, LLC, dba GammaWest Cancer Services, License No. UT 1800550
The review of the renewal was delayed by the licensee's delay in the original submittal of the renewal application. In addition, the RSO is new and is still learning what is necessary from an adequate renewal application. This delay has not caused an issue for the licensee and has not resulted in delayed medical treatment for patients. This license action should be completed by the time the NRC conducts their IMPEP review the week of September 9-12, 2019.

GammaWest Brachytherapy, LLC, dba GammaWest Cancer Services, License No. UT 0600553
The review of the renewal was delayed by the licensee's delay in the original submittal of the renewal application. In addition, the RSO is new and is still learning what is necessary from an adequate renewal application. This delay has not caused an issue for the licensee and has not resulted in delayed medical treatment for patients. This license action should be completed by the time the NRC conducts their IMPEP review the week of September 9-12, 2019.

V. Technical Quality of Incident and Allegation Activities

23. For Agreement States, please provide a list of any reportable incidents not previously submitted to NRC (See Procedure SA-300, *Reporting Material Events*, for additional guidance, OMB clearance number 3150-0178). The list should be in the following format:

<u>Licensee Name</u>	<u>License #</u>	<u>Date of Incident/Report</u>	<u>Type of Incident</u>
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All incidents that were reportable have been submitted to NRC.

24. Identify any changes to your procedures for responding to incidents and allegations that occurred during the period of this review.

In August 2015, Radioactive Materials staff received allegation refresher training regarding SA-300 and the DWMRC incident/allegation procedures. At the same training, one individual (Russ Topham) was assigned to ensure that events were reported to the NRC within the appropriate timeframe and that incidents were complete and closed out in a timely manner.

On August 30, 2016 Robert Sant from Idaho National Laboratory conducted Nuclear Material Events (NMED) training for all applicable DWMRC staff, including the LLRW, Uranium Mills, and Radioactive Materials program staff.

On June 19, 2018, all Utah Agreement State Program staff (i.e. radioactive materials, uranium mills, and low-level waste) received incident/allegation refresher training regarding SA-300 and the DWMRC incident/allegation procedures.

C. NON-COMMON PERFORMANCE INDICATORS

I. Compatibility Requirements

25. Please list all currently effective legislation that affects the radiation control program. Denote any legislation that was enacted or amended during the review period.

2017 LEGISLATION

Senate Bill 79 (S.B. 79) During the 2017 General Session of the Utah Legislature, S.B. 79 was passed, amending the Utah Radiation Control Act, to address the incompatibility findings of the 2015 IMPEP with respect to the statutory provisions for financial surety for a low-level radioactive waste (LLRW) disposal facility. In a letter dated June 27, 2017, (ML17143A410), the NRC states that as a result of their review of S.B. 79, no further comments were necessary, essentially resolving the incompatibility matter for financial surety.

Additionally, in a letter dated, January 12, 2018 (ML18019A129), Mr. Randall, Assistant Attorney General, Utah Attorney General's Office, provided a legal opinion regarding Utah's inspection authority under the Radiation Control Act. This letter specifically addresses NRC's request for such an opinion in a letter dated November 25, 2015 (ML15303A276) as well as addresses NRC's comment number 3 based on a review of the original 2015 legislation (S.B. 173 and S.B. 244), as stated in a letter dated March 18, 2015 (ML15068A249).

2019 LEGISLATION

House Bill 220 (H.B. 220) Amended the Utah Radiation Control Act to (1) provide that certain waste classifications are determined at the time of acceptance, (2) allow the director of the Division of Waste Management and Radiation Control to authorize alternate requirements for waste classification and characteristics, (3) require notification to the Legislature on alternate waste classification determinations, (4) require certain conditions associated with the disposal of more than one metric ton of concentrated depleted uranium, and (5) impose a tax on the disposal of concentrated depleted uranium. In a letter dated February 22, 2019 (ML19057A375), a copy of H.B. 220 was submitted to the NRC for review and comment. In a letter dated March 14, 2019

(ML19063B039), the NRC responded and indicated that based on their review of the bill there were no comments.

26. Are your regulations subject to a "Sunset" or equivalent law? If so, explain and include the next expiration date for your regulations.

The Utah Administrative Rulemaking Act (63G-3-101 *et seq.*, Utah Code Annotated (UCA)) provides that all administrative rules in effect on February 28 expire on May 1 each year unless reauthorized by the Legislature. During each general legislative session, the Administrative Rules Review Committee of the Utah Legislature files a bill reauthorizing all rules except any listed as "not reauthorized." The bill may except for reauthorization an entire rule, a single section of a rule, or any complete paragraph of a rule. Agencies whose rules are listed as not reauthorized have the opportunity to respond before passage of the bill. If the reauthorization bill fails to pass, the governor may reauthorize all rules by publishing a notice in the *Utah State Bulletin*, Utah's analogue to the *Federal Register*.

The Utah Administrative Rulemaking Act also requires an agency to review each of its administrative rules within five years of the rule's original effective date or last five-year review. To retain a rule as part of the *Utah Administrative Code*, an agency must also file a "Five-Year Notice of Review and Statement of Continuation" before the rule's anniversary date. The purpose of the review is to provide agencies with an opportunity to evaluate the rules to assess if the rules should be continued. In performing a five-year review, an agency may consider the need to amend or repeal rules that are archaic in form, are no longer used, are not based on existing statutory authority or are otherwise unnecessary.

The Radiation Control Act authorizes the Waste Management and Radiation Control Board to make rules governing the radiation control program (UCA §19-3-104(4), see also §19-6-104(1)). Because the Administrative Rulemaking Act's definition of "agency" includes each state board authorized or required by law to make rules, it is appropriate that the Board approve the five-year review of a rule.

To retain a rule as part of the Utah Administrative Code, a "Five-Year Notice of Review and Statement of Continuation" must be filed with the Office of Administrative Rules, before the rule's five-year anniversary date. Completing the form and filing it before the five-year review date satisfies the provisions of the Administrative Rulemaking Act with respect to a five-year review.

TABLE A
UTAH DIVISION OF WASTE MANAGEMENT AND RADIATION CONTROL
R313 – RADIATION CONTROL RULES – UTAH ADMINISTRATIVE CODE

FIVE-YEAR REVIEW / NOTICE OF CONTINUATION COMPLETIONS

RULE	TITLE	2016	2017
R313-12	General Provisions	7/1/2016	
R313-14	Violations & Escalated Enforcement	7/1/2016	
R313-15	Standards for Protection Against Radiation		1/17/2017
R313-16	General Requirements Applicable to the Installation, ... and use of Radiation Machines	7/1/2016	
R313-17	Administrative Procedures	7/1/2016	

R313-18	Notices, Instructions Reports to Workers by Licensees or Registrants	7/1/2016
R313-19	Requirements of General Applicability to Licensing of Radioactive Materials	7/1/2016
R313-21	General Licenses	1/17/2017
R313-22	Specific Licenses	7/1/2016
R313-24	Uranium Mills and Source Material Mill Tailings Disposal Facility Requirements	1/17/2017
R313-25	License Requirements for Land Disposal of Radioactive Waste	7/1/2016
R313-26	Generator Site Access Permit Requirements for Accessing Radioactive Waste Disposal Facilities	3/10/2016
R313-28	Use of X-Rays in the Healing Arts	7/1/2016
R313-30	Therapeutic Radiation Machines	1/17/2017
R313-32	Medical Use of Radioactive Material	7/1/2016
R313-34	Requirements for Irradiators	1/17/2017
R313-35	Requirements for X-Ray Equipment Used for non-Medical Applications	1/17/2017
R313-36	Special Requirements for Industrial Radiographic Operations	7/1/2016
R313-37	Security	1/17/2017
R313-38	Licenses and Radiation Safety Requirements for Well Logging	1/17/2017
R313-70	Payments, Categories and Types of Fees	7/1/2016

TABLE B
UTAH DIVISION OF WASTE MANAGEMENT AND RADIATION CONTROL
R313 – RADIATION CONTROL RULES – UTAH ADMINISTRATIVE CODE

FIVE-YEAR REVIEW / NOTICE OF CONTINUATION DUE

RULE	TITLE	2021	2022
R313-12	General Provisions	7/1/2021	
R313-14	Violations & Escalated Enforcement	7/1/2021	
R313-15	Standards for Protection Against Radiation		1/17/2022
R313-16	General Requirements Applicable to the Installation, ... and use of Radiation Machines	7/1/2021	
R313-17	Administrative Procedures	7/1/2021	
R313-18	Notices, Instructions Reports to Workers by Licensees or Registrants	7/1/2021	
R313-19	Requirements of General Applicability to Licensing of Radioactive Materials	7/1/2021	
R313-21	General Licenses		1/17/2022
R313-22	Specific Licenses	7/1/2021	
R313-24	Uranium Mills and Source Material Mill Tailings Disposal Facility Requirements		1/17/2022
R313-25	License Requirements for Land Disposal of Radioactive Waste	7/1/2021	
R313-26	Generator Site Access Permit Requirements for Accessing Radioactive Waste Disposal Facilities	3/10/2021	
R313-28	Use of X-Rays in the Healing Arts	7/1/2021	

R313-30	Therapeutic Radiation Machines	1/17/2022
R313-32	Medical Use of Radioactive Material	7/1/2021
R313-34	Requirements for Irradiators	1/17/2022
R313-35	Requirements for X-Ray Equipment Used for non-Medical Applications	1/17/2022
R313-36	Special Requirements for Industrial Radiographic Operations	7/1/2021
R313-37	Security	1/17/2022
R313-38	Licenses and Radiation Safety Requirements for Well Logging	1/17/2022
R313-70	Payments, Categories and Types of Fees	7/1/2021

NOTE: Utah statutes are available online at https://le.utah.gov/Documents/code_const.htm and Utah administrative rules are available online at <https://rules.utah.gov/publications/utah-adm-code/>.

The sunset provision for the Radiation Control Act was removed by legislative action in 2012. (S.B. 132, 2012 General Session). Consequently, the Utah Radiation Control Act, the underlying statutory authority for Utah's radiation control program, is not currently subject to a set expiration date.

27. Please review and verify that the information in the enclosed State Regulation Status (SRS) sheet is correct. For those regulations that have not been adopted by the State, explain why they were not adopted, and discuss actions being taken to adopt them. If legally binding requirements were used in lieu of regulations and they have not been reviewed by NRC for compatibility, please describe their use.

The most recent SRS data sheet is dated August 1, 2019 (TTN: 19-36). Based on this SRS data sheet, the following comments are provided:

RATS ID 2013-2: The date for an Agreement State to adopt the rule changes under RATS ID 2013-2 was August 27, 2016. On October 12, 2017, the Waste Management and Radiation Control Board approved the adoption of the final rule changes for RATS ID 2013-2 and set an effective date of October 13, 2017. A letter transmitting the final revised rules was submitted to the NRC on November 30, 2017 (ML 17339A952). In a letter dated January 16, 2018 (ML17339A950), the NRC recommended some minor revisions be made. The Division believes the recommended changes may provide added clarity, but may not be necessary for compatibility purposes and anticipates submitting a response to the NRC by the end of September, 2019.

RATS ID 2018-1: On August 8, 2019, the Waste Management and Radiation Control Board approved the final adoption of the rule changes published by the NRC in the July 16, 2018 *Federal Register* (83 FR 33046) regarding the medical use of byproduct material. The effective date of the final rule changes is August 9, 2019 and will be published in the September 1, 2019 issue of the *Utah State Bulletin*. A letter transmitting the final rules will be submitted to the NRC in September, 2019 following the publication of the final rule notice of effective date. In a letter dated August 1, 2019 (ML19183A076), the NRC indicated there were no comments on the draft rule submitted to the NRC by the Division (ML19183A115).

28. If you have not adopted all amendments within three years from the date of NRC rule promulgation, briefly describe your State's procedures for amending regulations in order to maintain compatibility with the NRC, showing the normal length of time anticipated to complete each step.

As noted in the response to Question 27 for RATS ID 2013-2, the Division believes that NRC's recommended changes may provide added clarity, but may not be necessary for compatibility purposes and anticipates submitting a response to the NRC's comments by the end of September, 2019.

The Utah Waste Management and Radiation Control Board is the rulemaking body for all administrative rulemaking for Utah's radiation materials management and control program. All rulemaking in Utah, including the process and associated timeframes, is governed by the Utah Administrative Rulemaking Act (63G-3-101 *et seq.*, Utah Code Annotated) and Title R15 of the Utah Administrative Code.

II. Sealed Source and Device (SS&D) Evaluation Program

29. Prepare a table listing new and amended (including transfers to inactive status) SS&D registrations of sources and devices issued during the review period. The table heading should be:

<u>SS&D Registry Number</u>	<u>Manufacturer, Distributor or Custom User</u>	<u>Product Type or Use</u>	<u>Date Issued</u>	<u>Type of Action</u>
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A response is not provided, because the question is not applicable to the Utah Radiation Control Program. On January 16, 1996, Utah's Governor Leavitt requested to relinquish to the NRC Utah's authority to evaluate sealed source and device applications. After reviewing the request and the staff's analysis, the Commission decided to reassume regulatory authority for sealed source and device evaluations in the State of Utah, effective June 1, 1996.

30. Please include information on the following questions in Section A, as they apply to the SS&D Program:

Technical Staffing and Training - Questions 2-9
Technical Quality of Licensing Actions - Questions 18-22
Technical Quality of Incident and Allegation Activities - Questions 23-24

A response is not provided, because the question is not applicable to the Utah Radiation Control Program. On January 16, 1996, Utah's Governor Leavitt requested to relinquish to the NRC Utah's authority to evaluate sealed source and device applications. After reviewing the request and the staff's analysis, the Commission decided to reassume regulatory authority for sealed source and device evaluations in the State of Utah, effective June 1, 1996.

III. Low-level Radioactive Waste Disposal Program

31. Please include information on the following questions in Section A, as they apply to the Low-Level Radioactive Waste Disposal Program:

Technical Staffing and Training - Questions 2-9

2. See organization chart at 2(c) above.

3. See response to question 3 in the "Common Performance Indicators" above.
4. During the 2015 General Session of the Utah Legislature, S.B. 244, *Department of Environmental Quality Modifications*, was enacted. This bill combined the Division of Radiation Control and the Division of Solid and Hazardous Waste into a new division named as the Division of Waste Management and Radiation Control. The effective date of the agency consolidation was July 1, 2015. Three individuals were moved from the Utah Hazardous Waste program to the Low-Level Radioactive Waste Disposal Program. Their professional experience is presented in our response to question 4 in the "Common Performance Indicators" above.
5. Not applicable.
6. See response to question 6 in the "Common Performance Indicators" above.
7. Boyd Imai (April 29, 2019).
8. Environmental Scientist, Low-Level Radioactive Waste: Vacant since April 29, 2019.
9. Yes, see answer to number 9 in the "Common Performance Indicators" above.

Status of Materials Inspection Program - Questions 10-14

10. The licensee is not inspected less frequently than the schedule established by NRC. See also the answer to number 10 in the "Common Performance Indicators" above.
11. Radiation Safety staff conducted approximately 130 modular inspections over the review period. Thirty (30) Groundwater inspection modules were conducted and 33 engineering inspection modules were completed. In total, there were approximately 175 inspections conducting during the review period.
12. The low-level radioactive waste disposal facility (EnergySolutions – License # UT2300249) is a Priority 1 licensee and is currently inspected on a modular basis. The agency conducts modular inspections regarding radiation safety, engineering, and groundwater. There are forty-three (43) individual modules developed for this licensee. These inspections are assigned at the beginning of the year by the program managers for appropriate staff members to complete. These inspections do not include the inspections performed as part of the Generator Site Access Permit Program. For the reporting period, the Generator Site Access Permit Program inspected approximately 7,000 shipments (by rail and highway) that were received at the disposal facility.
13. If inspections do not get completed during the year, then they are typically conducted during the first or second quarter of the following year. Program managers review the yearly inspection plan and coordinate with staff regarding the date the inspection will be conducted.
14. Not applicable.

Technical Quality of Inspections - Questions 15-17

15. See response to question 15 in the "Common Performance Indicators" above.
In addition, module inspections are update on an annual basis prior to being conducted by staff. Over the course of the review period, several modules were combined with other modules, some were eliminated and some new ones were developed.
16. The following table shows the number and types of supervisory accompaniments made during the review period.

Inspector	Supervisor	License Category	Date
Charlie Bishop	Don Verbica	4-a	12/3/15
Charlie Bishop	Don Verbica	4-a	09/19/16
Charlie Bishop	Don Verbica	4-a	8/29/17
Charlie Bishop	Don Verbica	4-a	12/3/18
Charlie Bishop	Don Verbica	4-a	7/18/19
Eric Boone	Don Verbica	4-a	11/9/18
Kevin Carney	Don Verbica	4-a	9/2/16
Kevin Carney	Don Verbica	4-a	8/17/17
Kevin Carney	Don Verbica	4-a	11/13/18
David Esser	Don Verbica	4-a	3/22/16
David Esser	Don Verbica	4-a	9/11/17
David Esser	Don Verbica	4-a	11/28/18
David Esser	Don Verbica	4-a	4/1/19
Jule Fausto	Don Verbica	GSA/4-a	9/30/16
Jule Fausto	Don Verbica	GSA/4-a	10/6/17
Jule Fausto	Don Verbica	GSA/4-a	9/17/18
Jule Fausto	Don Verbica	GSA/4-a	5/9/19
Boyd Imai	Don Verbica	4-a	7/8/16
Boyd Imai	Don Verbica	4-a	10/3/17
Boyd Imai	Don Verbica	4-a	3/16/18
Otis Willoughby	Don Verbica	4-a	9/20/16
Otis Willoughby	Don Verbica	4-a	9/18/17
Otis Willoughby	Don Verbica	4-a	9/18/18
Otis Willoughby	Don Verbica	4-a	7/16/19

Technical Quality of
Licensing Actions -
Questions 18-22
Technical Quality of
Incident and
Allegation Activities
-Questions 23-24

17. See response to question 17 in the "Common Performance Indicators" above.

Technical Quality of Licensing Actions - Questions 18-22

18. As of July 2019, the Division regulates one radioactive material licenses under the Low-Level Radioactive Waste program and one Groundwater Discharge Permit:

EnergySolutions	UT2300249	2-b	(more frequent)
EnergySolutions	UGW450005		

19. The Low-Level Radioactive Waste program has had one licensing action that met these

criteria, as follows:

EnergySolutions UT2300249: Amendment 24 - Conditions and requirements added for receipt, storage and transloading of radioactive material laden railcars stored on Section 29.

20. *EnergySolutions* requested a variance from License Condition 16.A to dispose of sealed sources as part of the source Collection and Threat Reduction Program. This variance was granted. *EnergySolutions* has requested that their license be amended to allow for the disposal of sealed sources. The Division is evaluating this request.

EnergySolutions requested a variance from License Condition 57.B to store rail cars on section 29 for 180 day on August 11, 2015 because of the DOT changes from July 11, 2015. The variance was granted. *EnergySolutions* has since amended its license to include storage of railcars on section 29.

EnergySolutions requested a variance to the Groundwater Discharge Permit to extend the open cell limit from 18 years to 25 years on October 16, 2015. The Division issued a conditional approval on January 29, 2016. The conditions for approval were: 1. If two consecutive years were to occur with above precipitation events of 9.32 inches we would reevaluate the variance and 2. Once a final decision was made concerning the proposed cover, *EnergySolutions* would begin final cover.

EnergySolutions requested a variance from License Condition 50.C to allow two steam generators destined for disposal to be left unattended. This variance was granted until the steam generators could be disposed.

EnergySolutions requested a variance from License Condition 11 on January 24, 2017 to temporarily increase to the amount of uncovered radioactive waste surface area waste. This was terminated on June 7, 2017.

21. None

22. *EnergySolutions* UT2300249

Following the submittal of the LLRW License Renewal Application (LRA) on October 25, 2012, License No. UT 2300249 has been in a status of timely renewal since November 29, 2012. Since October 25, 2012 the LRA has been retracted and resubmitted three times. LRA Revision 1 dated March 15, 2013 was mainly a response to the completeness review. LRA Revision 2 dated January 28, 2015 provided responses to interrogatories from Revision 1, incorporated new language for blended ion-exchange resin waste, and formalized a request to replace the approved rock armor cover design for the Class A West embankment with a new Alternative Evapotranspirative cover design. Shortcomings with the redesign of the embankment cover and with the blended waste performance assessment caused LRA Revision 2 to be retracted. The current LRA Revision 3 dated June 8, 2016 has reverted to the rock armor cover with a continued interest in receiving blended waste.

Due the adjudicative process, records supporting the issuance of a Radioactive Materials license must be clear and complete, requiring no additional explanation since the adjudicative process requires a review of the record and there is no longer a provision for

testimony explaining the record. During the above mentioned activities to revise and reissue the license with the potential for additional waste streams it was identified that fundamental concerns exist with the current make-up and record supporting a license renewal that need to be resolved during the renewal process.

To achieve this goal the LLRW section has begun bi-weekly meetings with keys staff of various disciplines, the Attorney General, and section leadership. Additionally LLRW professional staff has been reviewing pertinent sections of NUREG-1200 to address the essential pieces of the LRA that will be a part of a Safety Evaluation Report expected to support the renewal application. This methodology has also been reconciled within a Gantt schedule using Microsoft Project.

Technical Quality of Incident and Allegation Activities - Questions 23-24

- 23. See response to question 23 in the "Common Performance Indicators" above.
- 24. See response to question 24 in the "Common Performance Indicators" above.

IV. Uranium Recovery Program

- 32. Please include information on the following questions in Section A, as they apply to the Uranium Recovery Program:

Technical Staffing and Training - Questions 2-9

- 2. See organization chart in 2(c) above.
- 3. See response to question 3 in the "Common Performance Indicators" above.
- 4. There have been one individual hired to work in the Uranium Recovery Program since the last IMPEP review. Her professional experience is presented in the response to question 4 in the "Common Performance Indicators" above.
- 5. None
- 6. See response to question 6 in the "Common Performance Indicators" above.
- 7. Connie Rauen (February 18, 2016).
- 8. No vacancies in existing positions.
- 9. Yes, see answer to number 9 in the "Common Performance Indicators" above.

Status of Materials Inspection Program - Questions 10-14

- 10-12. The Division's uranium mill licensees include an active mill, a mill undergoing decommissioning and a mill in standby status. A comprehensive radiation safety inspection

is conducted at each facility. Current program plans call for the annual inspection to be performed over four quarters for the active mill and annually for the mills undergoing decommissioning and in a standby status. Inspections are also conducted on an ad hoc basis.

EnergySolutions (11e.(2) disposal)	UT 2300478	2-b	(more frequent)
Rio Algom Mining	UT 1000481	2-b	(more frequent)
Energy Fuels Resources	UT 1900479	2-b	(more frequent)
Anfield Resources Inc.	UT 0900480	2-b	(more frequent)

The agency conducts modular inspections of radiation safety, groundwater, and engineering activities at these facilities. There are 14 radiation safety modules for Energy Fuels Resources (active mill), two modules for Anfield Resources Inc. (standby status), and one module for Rio Algom Mining (decommissioning). In addition, there are approximately 22 individual groundwater modules and approximately 12 engineering modules regarding the four licensees. Radiation safety inspections regarding the EnergySolutions 11e.(2) disposal license are performed in conjunction with the low-level waste inspection modules. During the NRC review period the Division performed the following modular inspection at the four 11e.(2) facilities: 39 radiation safety inspections (29 at Energy Fuels Resources, 5 at Uranium One and 5 at Rio Algom), 43 engineering inspections, and 52 groundwater inspections.

13. If inspections do not get completed during the year, then they are typically conducted during the first or second quarter of the following year. Program managers review the yearly inspection plan and coordinate with staff regarding the date the inspection will be conducted.
14. Not applicable.

Technical Quality of Inspections - Questions 15-17

15. None for the Uranium Mills Program: See response to question 15 in the "Common Performance Indicators" above.
16. The following table shows the number and types of supervisory accompaniments made during the review period.

17. to	Inspector	Supervisor	License Category	Date	See response question 17 in the “Common Performance Indicators” above.	Technical Quality of Licensing Actions - Questions 18-22
	Dean Henderson	Phil Goble	2-b	6/6/2016		
	Dean Henderson	Phil Goble	2-b	10/12/2017		
	Dean Henderson	Phil Goble	2-b	8/1/2018		
	Dean Henderson	Phil Goble	2-b	6/11/2019		
	Ryan Johnson	Phil Goble	2-b	10/20/2015		
	Ryan Johnson	Phil Goble	2-b	4/27/2016		
	Ryan Johnson	Phil Goble	2-b	8/9/2017		
	Ryan Johnson	Phil Goble	2-b	3/6/2018		
	Heather Mickelson	Phil Goble	2-b	10/3/2017		
	Heather Mickelson	Phil Goble	2-b	10/16/2018		
	Heather Mickelson	Phil Goble	2-b	7/18/2019		
	Tom Rushing	Phil Goble	2-b	10/12/2016		
	Tom Rushing	Phil Goble	2-b	9/27/2017		
	Tom Rushing	Phil Goble	2-b	9/25/2018		
	Russ Topham	Phil Goble	2-b	8/24/2016		
	Russ Topham	Phil Goble	2-b	6/29/2017		
	Russ Topham	Phil Goble	2-b	3/26/2018		
	Russ Topham	Phil Goble	2-b	3/14/2019		

18. As of July 2019, the Division regulates four radioactive material licenses under the Uranium Mills Program:

EnergySolutions (11e.(2) disposal)	UT 2300478	2-b	(more frequent)
Rio Algom Mining	UT 1000481	2-b	(more frequent)
Energy Fuels Resources	UT 1900479	2-b	(more frequent)
Anfield Resources, Inc.	UT 0900480	2-b	(more frequent)

19. The Uranium Mill has had three licensing actions that meets this criteria, as follows:

1. The Energy Fuels Resources license renewal for the White Mesa Uranium Mill was completed on January 19, 2018. The renewal for the Ground Water Discharge Permit No. UGW370004 was issued the same day, January 19, 2018.
2. The Rio Algom Mining, LLC license renewal for the former Lisbon Valley Uranium Mill was completed on March 3, 2017.
3. On January 29, 2016 the DWMRC approved the Transfer of Control of the Shootaring Canyon Uranium Mill from Uranium One Americas, Inc. to Anfield Resources Holding Corporation (Anfield Resources). Transfer of control of the Mill also included changing the name of Radioactive Material License No. UT0900480 and Utah Groundwater Quality Discharge Permit No. UGW170003 to Anfield Resources.
4. The renewal of the EnergySolutions 11e.(2) license (UT 2300478) was completed on November 17, 2017.

20. None

21. None

22. Anfield Resources Holding, Corp. UT 0900480 License Renewal – On June 29, 2016, Anfield Resources submitted a License Renewal Application. On November 29, 2016, the DWMRC sent the licensee a Completeness Review letter that documented the submittal was incomplete. Anfield Resources submitted a revised License Renewal Application on June 27, 2017, which was also determined to be incomplete in a May 3, 2018 DWMRC letter. On September 17, 2018 Anfield Resources submitted a revised License Renewal Application. However, because the licensee has yet to submit a complete License Renewal Application, the DWMRC decision was made not to continue the review until all the required information is submitted. To date, we are still waiting on the licensee to submit the necessary documentation (e.g. complete submittal) to continue our review of the license renewal.

Technical Quality of Incident and Allegation Activities - Questions 23-24

23. See response to question 23 in the "Common Performance Indicators" above.
24. See response to question 24 in the "Common Performance Indicators" above.