

5.0 General Demolition Procedures

The following general procedures will be utilized during the demolition activities at the site:

- 5.1 Prior to start of demolition in a discrete area, mill facilities and equipment in that area will be washed down to minimize potential residual contamination;
- 5.2 Release of salvageable materials shall be performed in accordance with License Condition #25. A copy of the existing release survey procedure is provided in Appendix C. Salvageable items will be surveyed and if required, decontaminated until established release levels are obtained. Salvageable materials will be placed in a designated salvage area;
- 5.3 Equipment will be dismantled/broken up and buried in the approved disposal areas. Underground utilities and pipelines that are more than 2 feet below final grade and that have not been used to handle radioactive materials based on process knowledge (e.g. water supply lines, gas lines, etc.), will remain in place. Foundations along with other underground structures that do not demonstrate contamination in excess of background levels will either be broken up or remain in place and be covered with a minimum of two (2) feet of clean cover material. The final grade (contour) is projected to approximate the existing surface elevation in the mill area. Areas where Rio Algom may leave foundations intact include the lower portions of the thickeners, any basement type area, and any foundations that extend two feet below existing grade. Underground cavities that are below grade, such as the crushing circuit from the primary crusher to the transfer house, will remain in place and will be backfilled with clean material. Those foundations left in place will be characterized and released in a manner consistent with 10 CFR 40, Appendix A Criterion 6(6), and those that cannot be released in this manner will be excavated and disposed as byproduct material. Figure 4 identifies those areas where Rio Algom expects to leave foundations and/or subgrade components intact.
- 5.4 Disposal of all demolition waste that is classified as 11e.(2) byproduct material, as defined by the AEA of 1954, as amended, shall be performed in accordance with approved disposal practices as authorized by License Conditions #30, 32, 36, and 41 with the following modification. Placement of waste materials in excavations associated with the mill (ore pockets) will be authorized provided similar disposal controls as currently

authorized are used. Figure 5 identifies the existing approved disposal areas and the proposed disposal areas for mill demolition debris. Disposal areas will be closed in accordance with License Condition #41(I), which requires Rio Algom to submit a final reclamation plan upon the end of receipt operations. Rio Algom anticipates that reclamation efforts in areas where mill demolition debris will be disposed will involve either the placement of an engineered cover to control radon emissions or alternate release criteria will be requested.

5.5 Surplus chemicals/materials will be removed for sale or disposal prior to demolition of the area where these materials may be present. All gear boxes, transformers, motors, etc. will be drained prior to demolition with the drained material disposed in accordance with applicable regulations.

5.6 The demolition schedule shall be developed between site management and the selected demolition contractor and will take into consideration safety, radiation protection, personnel availability, salvage potential, contamination control, and weather constraints. At a minimum, any regulated asbestos containing materials shall be abated from a structure prior to commencing structure demolition.

6.0 Specific Demolition Procedures

Standard Operating Procedures ("SOP") specific to the demolition activities will not be developed until the contractor selection process has been completed. This will allow site management to develop more specific and effective SOPs because important information will be available including knowledge of the type of equipment that will be used, size of contractor workforce, proposed demolition schedule, and anticipated health and safety considerations. All SOPs will be developed in accordance with License Condition #14. These SOPs will outline the tasks required to perform the activity along with any radiation protection and/or contamination control practices to be followed while performing the task. The SOPs will outline specific personal hygiene practices to be followed to minimize potential radiological contamination, spill control measures, and any actions to take in the event an upset condition occurs. Appendix C contains an example of the specific radiation protection and control practices that are currently implemented for the yellowcake area and will be incorporated into the demolition SOPs.