UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

F A C S I M I L E

Name: Philip N. Cavendor
Organization: Ur-Energy USA, Inc. Docket No. 030-37410
Control No. 471262
Fax: 720-981-5643
Phone: 720-382-4455
From: Jacqueline D. Cook
Date: May 10, 2007
Subject: Application dated February 7, 2007 for New License
Pages: 4

Mr. Cavendor:

Per your application dated February 7, 2007, the items on the next page are deficiencies which require your response. **Please respond to this fax by Thursday, May 31, 2007.** If you are unable to respond by this due date, please don't hesitate to contact me so we can discuss an extension to the date. Our fax number is (817) 860-8263. You may respond by email if you'd like. My email address is jdc1@nrc.gov. If you have any questions regarding this fax, please call me at (817) 860-8132. When responding to this fax, please include the docket and control numbers located at the top of this page.

Thanking you in advance for your cooperation, assistance, and prompt response in this matter.

/RA/
Jacqueline D. Cook
Senior Health Physicist

1. If the neutron generator will be used at temporary job sites (i.e., locations where work is conducted for limited periods of time), please specify “temporary job sites anywhere in the United States where NRC maintains jurisdiction.”

2. Please note that the representative signing the application must be authorized to make binding commitments and to sign official documents on behalf of the applicant.

   Please confirm that the person signing the application (Mr. Philip Cavendor) is authorized to make binding commitments and to sign official documents on behalf of Ur-Energy USA, Inc. If not, then have a management representative of the corporation sign the license application. As discussed previously in “Management Responsibility”, signing the application acknowledges management’s commitment and responsibilities for the radiation protection program.

3. Please submit a maximum possession limit for hydrogen-3. How many neutron generators do you propose to have in your possession, including in storage?

4. A. Under Item 7 of your application, you state, in part, that Mr. Philip Cavendor has completed the Radiation Safety Officer (RSO) Refresher 40-Hour training 10 CFR 35.24 as of October 13, 2006. Please note that 10 CFR 35.24 is the authority and responsibilities for the radiation protection program for medical use of byproduct material. Please note that 10 CFR Part 39 is the applicable regulations and requirements for well logging.

   Please clarify this discrepancy in Item 7 of your application by deleting references to 10 CFR Part 35 and replacing them with applicable references to 10 CFR Part 39.

   B. Please submit documentation of the alternative information demonstrating that the proposed RSO is qualified by training and experience, e.g., listed by name as an authorized user or the RSO on an NRC or Agreement State license that requires a radiation safety program of comparable size and scope.

5. We were unable to locate your training program for logging supervisors and logging assistants.

   Please make sure your training program includes the following:

   A. Submit an outline of the training to be given to prospective logging supervisors to include topics as outlined in 10 CFR 39.61(e).

   B. Please expand Item 6 of your Radiation Protection Program (RPP) for the training of logging assistants to include:

      - Received copies of 10 CFR Parts 19, 20, and Operating & Emergency (O & E) Procedures
      - Classroom instruction in 10 CFR Parts 19 and 20

- ♦ Instruction in the use of licensed materials, remote handling tools, survey equipment, etc.
- ♦ Successfully completed a verbal or written examination

C. Submit your procedures for experienced logging supervisors who have worked for another licensee.

D. Provide a copy of a typical examination and the correct answers to the examination questions. Indicate the passing grade.

E. Specify the qualifications of your instructors in radiation safety principles and describe their experience with well logging activities. If training will be conducted by someone outside the applicant's organization, identify the course by title and provide the name, address, and telephone number of the company providing the training, and provide a course outline (if available).

F. Please identify the instructor for annual refresher training.

G. Describe the field (practical) examination that will be given to prospective logging supervisors and logging assistants.

H. Submit a description of your program for inspecting the job performance of each well logging supervisor or logging assistant at intervals not to exceed 12 months.

6. Please submit a sketch or drawing to scale of the mobile logging vehicle in which the neutron generator will be stored, identifying boundary lines, where applicable.

7. Please provide one of the following:

A. A statement that: "We will obtain a written agreement prior to well logging with a sealed source that meets the requirements specified in 10 CFR 39.15."

OR

B. If the requirement for a written agreement does not apply to you, then you should include a statement in your application that you will only log holes where the well owner or operator is part of your corporate structure or otherwise similarly affiliated, and you should describe the corporate affiliation.

8. Item 10 of your checklist under "Occupational Dosimetry", Appendix C, shows that a bioassay plan is "N/A"; however, you checked the box that indicates you will contract with an outside group for bioassay services.

Please explain this discrepancy.

9. Please expand Item 10 of the RPP to include the following:

   A. Transportation of licensed materials to field stations or temporary job sites, packaging of licensed materials for transport in vehicles, placarding of vehicles when needed, and physically securing licensed materials in transport vehicles during transportation to prevent accidental loss, tampering, or unauthorized removal.

   B. Procedures for picking up, receiving, and opening packages containing licensed materials, in accordance with 10 CFR 20.1906.

   C. Instructions for maintaining records in accordance with the regulations and the license conditions.

   D. Steps for the use, inspection, and maintenance of sealed sources, source holders, logging tools, source handling tools, storage containers, and transport containers, as required by 10 CFR 39.43.

   E. Procedures for identifying and reporting to NRC defects and noncompliance, as required by 10 CFR 21.21(a).

10. Please expand Item 11 of the RPP to include the following:

   A. Procedures and actions to be taken if a sealed source is ruptured, including actions to prevent the spread of contamination and minimize inhalation and ingestion of licensed materials and actions to obtain suitable radiation survey instruments, as required by 10 CFR 39.33(b).

   B. Instructions for the proper stroage and disposal of radioactive waste, if applicable.

11. Concerning waste management, please provide one of the following:

   A. A statement that: “We will use the model waste procedures published in Appendix T to NUREG-1556, Vol. 14, ‘Program-Specific Guidance About Well Logging, Tracer, and Field Flood Study Licenses’, dated April 2000.”

OR

   B. A statement that: “Provided are our procedures for waste collection, storage and disposal by any of the authorized methods described in this section.” Applicants should contact Region IV for guidance to obtain approval of any method(s) of waste disposal other than those discussed in this section.