



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-4005

July 27, 2007

Mr. Bernard Bonifas, General Manager
COGEMA Mining, Inc.
P. O. Box 730
Mills, Wyoming 82644-0730

SUBJECT: NRC INSPECTION REPORT 40-08502/07-001 AND NOTICE OF VIOLATION

Dear Mr. Bonifas:

This refers to the inspection conducted on June 26 - 28, 2007, at the Irigaray and Christensen Ranch uranium recovery facilities. The inspection consisted of a routine review of site status, management organization and controls, operations review and in-situ leach facilities, radiation protection, environmental monitoring, and radioactive waste transportation activities. A final exit briefing was held with Mr. Larry Arbogast and Mr. Tom Hardgrove at the conclusion of the inspection on June 28, 2007.

Based on the results of this inspection, the NRC has determined that two Severity Level IV violations of NRC requirements occurred. The violations involve: (1) exceeding annual production limit specified in the license of 50,000 pounds of yellowcake; and (2) having an expired waste disposal agreement. The violations were evaluated in accordance with the NRC Enforcement Policy included on the NRC's Web site at www.nrc.gov/about-nrc/regulatory/enforcement.html. The violations are cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding them are described in detail in the subject inspection report. The violations are being cited in the Notice because they were identified by the NRC and because you have not provided the NRC with comprehensive corrective actions to prevent recurrence.

Based on the results of this inspection, the NRC has determined that one additional Severity Level IV violation of NRC requirements occurred involving the failure to use a radiation work permit resulting in a worker intake of uranium. This violation is being treated as a Non-Cited Violation (NCV), consistent with Section VI.A of the Enforcement Policy. The NCV is described in the subject inspection report. If you contest the violation or significance of the NCV, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001, with copies to: (1) the Regional Administrator, Region IV; and (2) the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. For your consideration and convenience, an excerpt from NRC Information Notice 96-28, "Suggested Guidance Relating to Development and Implementation of Corrective Action," is enclosed. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Should you have any questions concerning this inspection, please contact Ms. Linda Gersey at 817-860-8299 or the undersigned at 817-860-8191.

Sincerely,

/RA/

D. Blair Spitzberg, Ph.D., Chief
Fuel Cycle and Decommissioning Branch

Docket No.: 40-08502
License No.: SUA-1341

Enclosures:

1. Notice of Violation
2. NRC Inspection Report
040-08502/07-001
3. NRC Information Notice 96-28

cc w/enclosure:

Mr. LeRoy C. Feusner
Wyoming Department of Environmental Quality
Solid and Hazardous Waste Division
122 West 25th Street
Cheyenne, Wyoming 82002

Bob Giurgevich, District III Supervisor
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Wyoming Radiation Control Program Director

bcc w/enclosure (via ADAMS e-mail distribution):

LDWert

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LMGersey

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RIV Nuclear Materials File - 5th Floor

SUNSI Review Completed: LMG ADAMS: Yes No

Initials: LMG

Publicly Available Non-Sensitive

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LMGersey	RJEvans	DBSpitzberg
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ENCLOSURE 1
NOTICE OF VIOLATION

COGEMA Mining, Inc.
Mills, Wyoming

Docket No. 040-08502
License No. SUA-1341

During an NRC inspection conducted on June 26 - 28, 2007, two violations of NRC requirements were identified. In accordance with the NRC Enforcement Policy, the violations are listed below:

- (A) License Condition 10.5 requires, in part, that the annual yellowcake production shall not exceed 50,000 pounds.

Contrary to the above, in calendar year 2005, the licensee produced a total of 178,274 pounds of yellowcake.

This is a Severity Level IV violation (Supplement VII).

- (B) License Condition 9.7 requires, in part, that the licensee's approved waste disposal agreement must be maintained on site and, in the event the agreement expires or is terminated, the licensee shall notify the NRC in writing within 7 days after the date of expiration or termination.

Contrary to the above, the licensee failed to notify the NRC as required following the December 31, 2006, expiration of the approved waste disposal agreement with Pathfinder Mines Corporation, Shirley Basin Mine, Wyoming.

This is a Severity Level IV violation (Supplement VII).

Pursuant to the provisions of 10 CFR 2.201, COGEMA Mining, Inc., is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with a copy to the Regional Administrator, Region IV, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at www.nrc.gov/reading-rm/adams.html to the extent possible, it should not include any personal privacy, proprietary or safeguards information so that it can be made available to the public without redaction.

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days.

Dated this 27th day of July 2007

ENCLOSURE 2

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket No. 40-08502

License No. SUA-1341

Report No. 40-08502/07-001

Licensee: COGEMA Mining, Inc.

Facilities: Irigaray/Christensen Ranch In-Situ Leach Facilities

Location: Johnson and Campbell Counties, Wyoming

Dates: June 26 through June 28, 2007

Inspectors: Robert J. Evans, PE, CHP, Senior Health Physicist
Fuel Cycle & Decommissioning Branch

Linda M. Gersey, Health Physicist
Nuclear Materials Inspection Branch

Approved By: D. Blair Spitzberg, Ph.D., Chief
Fuel Cycle & Decommissioning Branch

Attachment: Supplementary Information

EXECUTIVE SUMMARY

Irigaray and Christensen Ranch In-Situ Leach Facilities NRC Inspection Report 40-08502/07-001

This inspection included a review of site status, management organization and controls, operations review and in-situ leach facilities, radiation protection, environmental monitoring, and radioactive waste/transportation activities. Overall, the licensee was operating the facility in a safe and effective manner.

Management Organization and Controls

- The licensee had both an organization and procedures in place to adequately implement the performance-based license, and staffing levels were acceptable for the work in progress at the facility (Section 2).

Operations Review and In-situ Leach Facilities

- One violation was identified by the inspectors related to the exceedance of the annual production limit of yellowcake as specified in the license (Section 3).

Radiation Protection

- The licensee had implemented a radiation protection program that met the requirements established in 10 CFR Part 20. One Non-Cited Violation of license requirements was identified related to the failure of an employee to utilize a radiation work permit while performing non-routine maintenance, which resulted in a uranium intake. Occupational exposures were well below NRC limits (Section 4).

Environmental Monitoring

- The licensee's groundwater monitoring program was determined to be in compliance with license requirements (Section 5).
- The licensee had completed restoration activities at the Christensen Ranch wellfields and continues restoration at Irigaray (Section 5).

Transportation of Radioactive Material and Radioactive Waste Management

- Radioactive waste related activities were conducted in accordance with applicable regulatory requirements, with one exception. A violation of a license condition was identified related to having an expired waste disposal agreement (Section 6).
- The licensee was conducting transportation operations in accordance with regulatory requirements (Section 6).

Report Details

1 Site Status

The Irigaray project started commercial ISL extraction operations during November 1978. The central processing facility is located at the Irigaray site, while the Christensen Ranch site is a satellite facility for the Irigaray plant. The licensee submitted a decommissioning plan for both facilities in May 2000, which was approved by the NRC on December 31, 2001. Groundwater restoration has been completed at Christiansen Ranch site and continues at the Irigaray.

By NRC letter dated September 20, 2006, the licensee was approved to begin plugging and abandoning wells at Irigaray Mining Units 1 through 9. The Wyoming Department of Environmental Quality accepted these Mining Units as restored to pre-mining class of use in November 2005. To date, 402 wells have been pugged and abandoned. Other activities at Irigaray include removing surface wellfield piping and electrical lines and removal of wellfield buildings and foundations. The Irigaray yellowcake dryer was in operation from January 5, 2005, through February 27, 2005, to dry remaining uranium from the Christensen groundwater restoration operations.

In May 2005, the Christensen Ranch site completed groundwater restoration at the last wellfield to be restored, Mine Unit 6. At that time, all restoration activity ceased and the stabilization monitoring period commenced. Sampling of monitor wells in Mine Units 2 through 6 continue.

2 Management Organization and Controls (88005)

2.1 Inspection Scope

The organizational structure was reviewed to ensure that the licensee had established an effective organization with defined responsibilities and functions. Also, the utilization and implementation of the licensee's performance-based license (PBL) was reviewed.

2.2 Findings and Observations

a. Management Organization

At the time of this inspection, the licensee had an onsite staff of 12 employees. A new radiation safety officer (RSO) was approved by the NRC on September 6, 2005. One staff member assists the RSO with radiation safety duties. The onsite organizational structure agreed with the licensee organization chart dated May 5, 2004.

b. Performance-Based License Review

License Condition 9.4 states, in part, that the licensee may, under certain conditions and without prior NRC approval, make changes in the facility or processes, make changes to procedures, or conduct tests and experiments not presented in the license application.

For calendar year (CY) 2004 through the date of this inspection, the licensee had not held any Safety and Environmental Review Panel (SERP) meetings nor made any changes to its license that would require a SERP.

c. Site Procedures

In accordance with License Condition 9.6, standard operating procedures (SOPs) are required to be established and followed for all operational process activities involving radioactive materials that are handled, processed, or stored. Additionally, all written procedures will be approved in writing and reviewed annually by the radiation safety officer (RSO). The inspectors observed several SOPs being followed appropriately, such as the use of survey meters for personnel monitoring while exiting from restricted areas.

The RSO had conducted the annual review of SOPs for CY 2004 through CY 2007.

2.3 Conclusions

The licensee had both an organization and procedures in place to adequately implement the PBL, and staffing levels were acceptable for the type and scope of work in progress at the facility.

3 Operations Review (88020); In-Situ Leach Facilities (89001)

3.1 Inspection Scope

A site tour was conducted by the inspectors. The inspector observed that site activities were being conducted in accordance with applicable regulations, conditions of the license, and to ensure that operational controls were adequate to protect the health and safety of the workers and members of the general public.

3.2 Findings and Observations

a. Site Tour

During the plant tour, site buildings, equipment, fences, and gates were observed. Site perimeter postings required by License Condition 9.11 were noted by the inspectors to be in place at all entrances to the site. No significant health or safety concern was identified during the tour.

The inspectors performed independent radiological surveys using an NRC-issued Ludlum Model 19 microRoentgen meter (NRC No. 015546 with a calibration due date of 02/12/08). Ambient gamma exposure rate readings averaged 30-50 microRoentgen per hour ($\mu\text{R/hr}$) at both Irigaray and Christensen Ranch sites. No radiation areas in excess of 5 milliRoentgen per hour were identified by the inspectors during the site tour at either the Irigaray or Christensen Ranch sites.

b. Process Plant Operations

License Condition 10.5 authorizes the licensee to produce no more than 50,000 pounds of yellowcake per year. In 2005, the restoration fluid collected since 2001 from decommissioning activities was dried into yellowcake. A total of 178,274 pounds of yellowcake was produced and placed into 274 55-gallon drums. Exceeding the annual yellowcake production limit was identified as a violation of License Condition 10.5 (VIO 40-08502/0701-01). The licensee did not consider that they would collect the

restoration fluid until it was feasible to run the dryer, which took several years, and would cause them exceed the annual production limit. Additionally, this violation is of concern because it occurred while the environmental monitoring program was suspended.

3.3 Conclusions

A violation was identified involving the exceedance of the annual yellowcake production limit during 2005. No significant health or safety concern was identified during tours of the Irigaray and Christensen Ranch sites.

4 **Radiation Protection (83822)**

4.1 Inspection Scope

The purpose of this portion of the inspection effort was to determine if the licensee's radiation protection program was in compliance with requirements established in the license and 10 CFR Part 20 regulations.

4.2 Findings and Observations

a. Audit Program Review and Personnel Exposures

In accordance with License Condition 12.6, an annual as low as is reasonably achievable (ALARA) audit of the radiation safety program is required to be performed and provided to the NRC. The licensee performed ALARA audits for CY 2004 through CY 2006. All audits were found to be thorough and comprehensive.

The inspectors reviewed personnel exposure data for CY 2005 through the date of this inspection to determine compliance with License Condition 11.7, which requires the licensee to assess personnel exposures in accordance with the provisions of 10 CFR 20.1502 and Section 5.7 of the license application. Since CY 2004, up to seventeen workers at any time wore dosimeters with the highest total effective dose equivalent measuring 22 millirems.

Additionally, the inspectors reviewed airborne particulate and radon progeny air sampling data for CY 2004 through the date of this inspection. The inspectors determined that the licensee had conducted monthly air sampling as required by License Condition 10.10.

Overall, the inspectors determined that personnel exposures, for CY 2004 through through the date of this inspection, were a small percentage of the allowable limit of 5,000 millirem per year specified in 10 CFR Part 20.

b. Decommissioning Recordkeeping

In accordance with 10 CFR Part 40.36(f)(1), decommissioning records are required to be permanently maintained, including a description of the restricted area, spills, and any unusual events. The licensee was noted by the inspectors as having maintained these records in onsite files.

c. Personal and Equipment Contamination Monitoring

License Condition 10.11 states, in part, that employees shall monitor themselves with an alpha survey instrument prior to exiting the site restricted areas. The inspectors observed that workers routinely conducted personnel contamination surveys before leaving the process areas and documenting the survey on the appropriate form. The inspectors observed workers functionally checking the contamination survey instruments prior to each use.

License Condition 9.8 stipulates, in part, that the release of equipment or packages from the restricted area shall be in accordance with the attachment to the license entitled, "Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use or Termination of Licenses for Byproduct or Source Materials." The licensee's equipment release records were reviewed for CY 2004 through the date of this inspection. The licensee had maintained records of equipment release showing that all released equipment was below contamination limits.

d. Bioassay Program Review

The bioassay program requirements listed in License Condition 10.12 states, in part, that the licensee shall implement the bioassay program discussed in Regulatory Guide 8.22, Bioassay at Uranium Mills. The licensee's CY 2005 bioassay records indicated that one individual exceeded the first action level of 15 micrograms per liter ($\mu\text{g/l}$) uranium in urine. The individual's bioassay measured 44 $\mu\text{g/l}$ uranium. The follow up bioassay taken five days later produced a non-detectable reading of less than 5 $\mu\text{g/l}$ uranium. The licensee investigated the bioassay result and determined that the employee had performed non-routine maintenance on the conveyor belt bearings from the yellowcake Drum Room without a radiation work permit (RWP). The individual wore the appropriate personal protective clothing and respirator while filling drums with dried yellowcake in the Drum Room. The bearings were removed from the Drum Room to be repaired and after exiting the Drum Room, the worker removed his respirator. The licensee believes he received an intake of uranium due to the yellowcake on the bearings. A thorough investigation was conducted and the licensee took appropriate action as required in Regulatory Guide 8.22. See Section 4.2 (f) below for further details.

e. Radiation Surveys

Licensee procedures require that all radiation survey instruments be operationally checked before each use. The radiation detection equipment in service at the plant sites were observed by the inspectors for operability. All radiation detection equipment used for personnel scanning and frisking were found to be properly calibrated and appeared to be fully functional. Each instrument responded accordingly when tested with a check source. Radiation survey records and instrument calibration records reviewed by the inspectors were found to be acceptable.

The licensee's May 2000 Decommissioning Plan, "NRC-approved Standard Operating Procedure for Gamma Exposure Rate Surveys, (HP-2)," states that gamma surveys be performed quarterly or monthly when an action level of 2 millirem in any one hour is exceeded. All site gamma exposure rates measured by the licensee were less than 5 millirem/hour at Christensen Ranch and at Irigaray.

f. Radiation Work Permits

License Condition 10.9 requires the licensee to use RWPs for all non-routine work or non-routine maintenance jobs where the potential for significant exposure to radioactive material exist and no applicable standard operating procedure exists. The inspectors reviewed RWPs that were utilized in CY 2004 (12 RWPs), CY 2005 (48 RWPs), CY 2006 (62 RWPs) and to the date of the inspection in CY 2007 (44 RWPs).

One violation was identified regarding failure to use a RWP while performing non-routine maintenance work on conveyor belt bearings from the Drum Room. During a weekend shift in January 2005, a licensee employee repaired conveyor rollers from the Drum Room. The employee exited the Drum Room and removed his respirator to work on the bearings in the dry pack area. The following day, he submitted a routine bioassay sample that came back with a positive reading of 44 ug/L uranium. A second bioassay sample from this worker was collected 5 days later which showed no detectable uranium. This employee had conducted non-routine maintenance activities without using a radiation work permit. The licensee concluded that a radiation work permit should have been used to perform this work. A thorough investigation was conducted and the licensee took appropriate actions to prevent recurrence. These actions included retraining workers in the need to obtain an RWP for all non-routine maintenance and stressing the importance of not conducting non-routine work over the weekend when the radiation safety personnel are not on site. The licensee conducted followup and corrective actions as outlined in Regulatory Guide 8.22 to the elevated sample results. The NRC concluded that information regarding the reason for the violation, and the corrective actions taken and planned to correct the violation and prevent recurrence, is already adequately addressed on the docket in this report. This licensee identified and corrected violation of License Condition 10.9 is being treated as a Non-Cited Violation consistent with Section VI.A of the Enforcement Policy (NCV 40-08502/0701-02). Therefore, the licensee is not required to respond to this violation unless the description herein does not accurately reflect its corrective actions or its position. In that case, or if the licensee chooses to provide additional information, it should follow the instructions specified in the enclosed Notice.

4.3 Conclusions

The licensee had implemented a radiation protection program that met the requirements established in 10 CFR Part 20 and the conditions of the license, with one exception. A Non-Cited Violation was identified related to a failure to use a RWP to perform non-routine maintenance. Occupational exposures were well below the NRC limits.

5 Environmental Monitoring (88045)

5.1 Inspection Scope

License Conditions 11.3 and 12.1 requires the licensee to implement and report to the NRC annually the effluent and environmental monitoring program results. At the time of the inspection, the licensee's environmental monitoring program consisted of sampling airborne particulates (during dryer operations), surface water, and groundwater.

5.2 Observations and Findings

a. Groundwater Monitoring Program

License Condition 11.2 states, in part, that all designated monitor wells shall be sampled and tested for upper control limits (UCLs) established in accordance with License Condition 10.4 and if routine sampling results indicate an exceedance of at least two UCLs, a second sample shall be collected. Confirmed exceedances of the UCLs in monitoring well samples shall be reported to the NRC. A review of selected licensee monitoring well data since the previous inspection did not identify any wells in excursion status that had not been previously reported to the NRC.

b. Evaporation Impoundments

The physical condition of all lined impoundments at both the Irigaray and Christensen Ranch sites was inspected. Since the previous inspection, Christensen Ranch Ponds A, C, D, RA, and E were emptied and in decommissioning. All decommissioned items were transported off-site for disposal in accordance with applicable requirements. At Irigaray, Ponds IR-B and IR-RB continued to be sampled quarterly. At Christensen Ranch, Ponds CR-P1, CR-1, CR-2, CR-3 and CR-4 also continued to be sampled quarterly.

Per License Condition 11.4, the licensee performed and documented weekly visual inspections of all evaporation pond embankments, fences and liners, as well as measurements of pond freeboard and checks of the leak detection system. The inspectors toured the evaporation ponds and found them in good physical condition with no visible tears or holes in the liner material.

c. Environmental Monitoring Program Review

License Condition 11.3 states, in part, that the licensee shall implement the effluent and environmental monitoring program specified in the approved Decommissioning Plan. The Decommissioning Plan eliminated the requirements for environmental monitoring of radon and gamma radiation. Only during dryer operations is the licensee required to perform dryer stack emissions tests and continuous airborne radionuclide sampling at Irigaray Ranch. Since the last inspection, the dryer was operated one time in 2005. During dryer operations, stack emissions testing and continuous airborne sampling were conducted. The inspectors reviewed the effluent data and determined that, in 2005, the licensee did not exceed the dose limits to members of the public.

d. Groundwater Restoration Program

Since the last inspection, groundwater restoration continued at Christensen Ranch in the last wellfield to be restored, Mine Unit 6, through the end of May 2005. At that time, all restoration activity ceased and the stabilization monitoring period commenced with quarterly monitoring. At Irigaray Ranch, restoration of Mine Units 1 through 9 have been completed and the Wyoming DEQ has released the groundwater to its original pre-mining conditions. Over 400 wells have been plugged and abandoned by the licensee.

e. Effluent Releases to Surface Waters

The Willow Creek surface water discharge outfalls at the Irigaray and Christensen Ranch facilities were examined to evaluate if the licensee was in compliance with 10 CFR Part 20. Willow Creek intermittently flows through parts of the licensee's site. The inspector reviewed the available surface water samples for CY 2004 through CY 2007 and determined that all samples were less than the 10 CFR Part 20, Appendix B, Table 2, Effluent Concentration Limits for all radionuclides analyzed.

5.3. Conclusions

The licensee has completed ground water restoration activities at the Irigaray and Christensen Ranch wellfields. Decommissioning activities undertaken by the licensee at the Irigaray facility and the Christensen Ranch were noted by the inspectors to be conducted in accordance with the NRC approved Decommissioning Plan.

**6 Transportation of Radioactive Material (86740)
Radioactive Waste Management (88035)**

6.1 Inspection Scope

The inspectors reviewed decontamination, disposal and transportation records to determine if these activities were being conducted in compliance with regulatory requirements.

6.2 Observations and Findings

The licensee ships radioactive materials in the form of radioactive waste. During CY 2004 through the date of this inspection, the licensee had completed a total of 232 waste shipments to Pathfinder Mines Corporation, Shirley Basin Mine. The inspectors reviewed the licensee's shipment records. Shipping records and manifests reviewed by the inspectors indicated that the licensee was in compliance with NRC and U.S. Department of Transportation (DOT) regulations. Included in the licensee's records were survey forms for documentation of DOT-required radiological surveys.

License Condition 9.7 authorizes the licensee to dispose of 11e.(2) byproduct material at a site licensed by the NRC or Agreement State. The License Condition also requires the licensee to notify the NRC within 7 days of the expiration or termination of the waste disposal agreement. The inspectors found that the waste disposal agreement between the licensee and Pathfinder Mines Corporation, Shirley Basin Mine, Wyoming, had expired on December 31, 2006. The licensee made ten shipments of 11e.(2) material to Shirley Basin for disposal after December 31, 2006. This inspector finding is a violation of License Condition 9.7 (VIO 40-08502/0701-03). The licensee stated that allowing the waste disposal agreement to expire was an oversight. The same day the inspectors identified this violation the licensee took action to renew the disposal contract with Shirley Basin. On July 23, 2007, the inspectors received a copy of the new agreement, valid until December 31, 2010.

6.3. Conclusions

The licensee was conducting transportation of radioactive waste in accordance with regulatory requirements. One violation of License Condition 9.7 was identified pertaining to the expiration of the waste disposal agreement with Shirley Basin.

7 Exit Meeting Summary

The inspectors presented the preliminary inspection results to Mr. Larry Arbogast and Mr. Tom Hardgrove at the conclusion of the inspection on June 28, 2007. Licensee representatives acknowledged the findings as presented. The licensee did not identify any information reviewed by the inspector as propriety information.

ATTACHMENT

PARTIAL LIST OF PERSONS CONTACTED

Licensee

R. Mark Owens, Mine Manager
L. Arbogast, Radiation Safety Officer
T. Hardgrove, Manager, Environmental and Regulatory Affairs

INSPECTION PROCEDURES USED

88005	Management Organization and Controls
88020	Operations Review
89001	In-Situ Leach Facilities
83822	Radiation Protection
88045	Environmental Monitoring
86740	Transportation of Radioactive Material
88035	Radioactive Waste Management

ITEMS OPENED, CLOSED AND DISCUSSED

Opened

40-08502/0701-01	VIO	Exceeded annual production of 50,000 pounds of yellowcake
40-08502/0701-02	NCV	Conducting non-routine work without a radiation work permit
40-08502/0701-03	VIO	Waste disposal agreement expired

Closed

40-08502/0701-02	NCV	Conducting non-routine work without a radiation work permit
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Discussed

None

LIST OF ACRONYMS USED

ALARA	annual as low as is reasonably achievable
ISL	in-situ leach
µg/l	microgram per liter
µR	microRoentgen
PBL	Performance-Based License
RSO	radiation safety officer
RWP	radiation work permit
SERP	Safety and Environmental Review Panel
SOP	standard operating procedure
UCL	Upper Control Limits
VIO	Violation
NCV	Non-cited Violation
CY	Calender year
DEQ	Wyoming Department of Environmental Quality