

**From:** Krista Wenzel [Krista\_Wenzel@cameco.com]  
**Sent:** Monday, June 22, 2009 11:08 AM  
**To:** Mandeville, Douglas  
**Subject:** RE: Toll Milling License Amendment Request

Hi, Doug.

As we talked about this morning, our memos and our intention has not been to refer to an expansion of the license amendment request. The June 19 letter and October 1 follow up letter did not limit transport to Wyoming. The first sentence in the June 19 memo refers to toll milling at PRI facilities. The phrase "at their facilities" is operative on the verb "toll milling" and thus refers to PRI facilities. If the "facilities" referred to the third party facilities, the correct phrase might be acceptable if changed from "at their facilities" to "from their facilities" although it would still be an awkward phrase searching for an operative verb, i.e., "transported from their facilities".

In addition, processing is only addressed for resin from NRC-licensed facilities, thus third-party local transport would be addressed by the third-party license, although it is likely that those risks would still not vary significantly from those already assessed. This is further substantiated by the statement in the October 1 follow-up letter: "Shipment responsibilities and procedures will be established by the Third Party and comply with NRC, Occupational Safety and Health Administration (OSHA) and United States Department of Transportation (DOT) regulations." As further support, examples from California risk analyses using a higher risk scenario were used in the bounding study provided in the October 1 follow up letter.

We appreciate your consideration.

Thanks,

Krista

Krista Wenzel  
Manager, Environment, Health and Safety  
Cameco Resources; Smith Ranch - Highland Uranium Project  
307-358-6541 x462

**From:** Mandeville, Douglas [mailto:Douglas.Mandeville@nrc.gov]  
**Sent:** Wednesday, June 17, 2009 6:48 AM  
**To:** Krista\_Wenzel@cameco.com  
**Subject:** Toll Milling License Amendment Request

Krista -

The NRC staff is in the process of performing its technical and environmental review related to the processing of third party ion exchange resins at the Smith Ranch facility. In the original license amendment request dated June 19, 2008, PRI indicated that the third parties would be located in Wyoming. The NRC staff has been conducting its safety and environmental reviews based on the information contained in both the June 19 (ML081760278) letter and a follow up submittal dated October 1, 2008 (ML082820419).

The NRC staff understands that PRI is considering expanding the license amendment request to include receipt of third party ion exchange resins from facilities located outside of Wyoming. This would represent a change to the information that the staff is currently reviewing and additional information would likely need to be provided. Receipt of resins from outside the state of Wyoming could represent a significant increase in the

amount of time and distance the resins would be shipped. As discussed in a letter from the NRC to PRI dated July 23, 2008 (ML082030638), the potential environmental impacts of transporting third party ion exchange resin would need to be addressed. NUREG 1748 provides guidance on the NRC's environmental review of licensing actions.

Note that licensing actions of this nature are not covered by categorical exclusion criteria and are therefore subject to an environmental review. Further discussion guidance related to the categorical exclusion criteria can be found in Chapter 2 of NUREG 1748. As the agency comment period for the current review has finished, any changes to the license amendment request would likely require, at a minimum, an additional agency comment period.

Let me know if you have any questions and how you would like to proceed.

Doug

Douglas T. Mandeville  
U.S. NRC  
Uranium Recovery Licensing Branch  
301-415-0724

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11:08:13 -0400

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22 Jun 2009 11:08:11 -0400

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22 Jun 2009 09:08:11 -0600 (MDT)

Reply-To: <Krista\_Wenzel@cameco.com>

From: Krista Wenzel <Krista\_Wenzel@cameco.com>

To: "'Mandeville, Douglas'" <Douglas.Mandeville@nrc.gov>

References: <3DF2506A7257014AAC5857E5E852DEAC0756F2D2F0@HQCLSTR02.nrc.gov>

In-Reply-To: <3DF2506A7257014AAC5857E5E852DEAC0756F2D2F0@HQCLSTR02.nrc.gov>

Subject: RE: Toll Milling License Amendment Request

Date: Mon, 22 Jun 2009 09:08:09 -0600

Organization: Cameco Resources

Message-ID: <000901c9f34b\$41313350\$c39399f0\$@com>

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Return-Path: Krista\_Wenzel@cameco.com