

September 8, 2009

Mr. Mike Griffin
Director of Environmental
and Regulatory Affairs
Uranium One
907 N. Poplar Street
Suite 260
Casper, WY 82601

SUBJECT: July 27, 2009, CONFERENCE CALL REGARDING ENERGY METALS
CORPORATION'S MOORE RANCH IN SITU RECOVERY URANIUM PROJECT

Dear Mr. Griffin:

On July 27, 2009, a public conference call was held to discuss Energy Metals Corporation's (EMC's) application for a license to construct and operate a uranium *in situ* recovery facility at its Moore Ranch site. EMC is a wholly owned subsidiary of Uranium One, Inc. The U.S. Nuclear Regulatory Commission (NRC) staff has completed a significant portion of its review of the radiological and non-radiological aspects of EMC's application and prepared an internal draft of the Safety Evaluation Report (SER). The conference call was held to discuss open issues that NRC staff identified in preparing the radiological and miscellaneous sections of the draft SER. A summary of the meeting is enclosed.

Within 30 days, please either provide the information identified in the meeting summary or inform us of the date you expect to provide the information. Note that a delay in providing information may result in a delay in NRC staff's review of your application.

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

Sincerely,

/RA/

Douglas T. Mandeville, Project Manager
Uranium Recovery Licensing Branch
Division of Waste Management
and Environmental Protection
Office of Federal and State Materials
and Environmental Management Programs

Docket No. 40-9073
Enclosure: Meeting summary

cc: G. Mooney, WDEQ
Meeting Attendees

September 8, 2009

Mr. Mike Griffin
Director of Environmental
and Regulatory Affairs
Uranium One
907 N. Poplar Street
Suite 260
Casper, WY 82601

SUBJECT: July 27, 2009, CONFERENCE CALL REGARDING ENERGY METALS
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MEETING SUMMARY
Energy Metals Corporation Moore Ranch ISR

DATE: July 27, 2009

TIME: 10:00 a.m. – 1:00 p.m.

PLACE: U.S. Nuclear Regulatory Commission
Two White Flint North, Rockville, Maryland
Room T8 C5

PURPOSE: To discuss radiological and miscellaneous issues relating to Moore Ranch ISR License Application

ATTENDEES: See Attached Attendee List

BACKGROUND:

The teleconference was held to discuss Energy Metal Corporation's (EMC's) application to construct and operate an *in situ* recovery (ISR) uranium facility at its Moore Ranch site in Wyoming. The U.S. Nuclear Regulatory Commission (NRC) staff had completed its review of the radiological aspects of EMC's application and prepared an internal draft of the Safety Evaluation Report (SER). The teleconference was held to discuss open issues that NRC staff identified in preparing the radiological and miscellaneous sections of the draft SER.

DISCUSSION:

The teleconference began at 10:00 a.m. EST. The NRC team leader for new uranium recovery facilities, Steve Cohen, stated that the meeting was open to the public and that members of the public would be allowed to ask questions or make comments at the end of the meeting. Several members of the public listened in on the conference call.

The NRC staff discussed the status of its review. The staff indicated that this meeting addresses several radiological, health physics, and miscellaneous sections of the draft SER, but that several sections remain to be completed. The remaining sections are related to radiological and health physics and are expected to be finished within the next few weeks. When these remaining sections of the draft SER are complete, another conference call will be held to discuss open issues from that review.

The open issues were then discussed.

RADIOLOGICAL and HEALTH PHYSICS OPEN ISSUES

A summary of the issues identified and EMC's responses is presented below.

Enclosure

1. Air sampling for less than 12 months.

The NRC staff notes that the air particulate and radon samples do not represent a minimum of 12 consecutive months of data as recommended by Regulatory Guide 4.14. Particulate and air samples do not represent one full year. It is noted that 10 CFR Part 40, Appendix A, Criterion 7, requires one full year of data prior to any major site construction. Table 2.9-12, presents two quarters of radon data.

EMC stated that radon sampling occurred from December 2006 to January 2008, and that two quarters of radon monitoring data were submitted with the RAI response in July 2008. EMC indicated that it will supplement the missing particulate data.

2. Lack of livestock sampling not justified.

The staff notes that the applicant did not report the range, population, residence time, or habitat of livestock within the license area and surrounding 2.0-mile radius as provided in Figure 2.2-1 of the Technical Report. The applicant concluded that the potential for bioaccumulation of radionuclides in these animals would be limited but provided no data or justification for this statement.

EMC indicated that its May 2008 response to an NRC request for additional information adequately characterized the food chain dose pathways.

3. Lack of crop sampling not justified.

The staff notes that the applicant did not address the collection of crop samples or provide a justification for not collecting crop samples.

EMC indicated that it did perform vegetation sampling, but there are no crops in the vicinity of the site.

4. Baseline groundwater sampling for less than 12 months.

The staff notes that the applicant collected less than one full year of groundwater samples. However, 10 CFR 40 Appendix A, Criterion 7, requires that prior to any major site construction, a preoperational monitoring program covering one full year must be conducted to provide complete baseline data at a milling site and its environs.

EMC indicated it has collected three quarters of sampling results for most of the parameters. EMC referred the staff to Table 2.9A

5. Baseline surface water sampling for less than 12 months.

The staff notes that the applicant collected less than one full year of surface water samples. However, 10 CFR 40 Appendix A, Criterion 7, requires that prior to any major site construction, a preoperational monitoring program covering one full year must be conducted to provide complete baseline data at a milling site and its environs.

EMC stated in its report that the streams are ephemeral, and that on some dates that the streams were dry. EMC has continued to collect data and will submit it as a response to the meeting summary.

6. Surface water sampling results not identified as suspended or dissolved.

The staff notes that the applicant did not delineate between suspended and dissolved water sample results as recommended by Regulatory Guide 4.14.

EMC stated that all surface water samples are dissolved, with the exception of a few parameters that meet guideline 8 as required by WDEQ.

6A. Quantity of material released to unrestricted areas.

Regulatory Guide 3.59 addresses methods, models, data, and assumptions acceptable to the NRC staff for estimating airborne emissions of radioactive and toxic materials from uranium milling. The applicant did not provide sufficient information regarding the manner in which it will calculate or measure effluent releases from monitored release points. Additionally, the applicant has not provided sufficient information regarding how it plans to meet the requirement in 10 CFR 40.65 for reporting the quantity of each of the principal radionuclides released to unrestricted areas.

EMC indicated that it addressed this issue in its MILDOS modeling. EMC acknowledged the issue.

6B. As Low As Is Reasonably Achievable (ALARA) effluent levels for radon and uranium particulates.

The applicant also did not address how the requirements of 10 CFR 40, Appendix A, Criterion 8, and 10 CFR 20.1101(d) regarding ALARA effluent levels for radon and uranium particulates.

EMC acknowledged the issue and indicated that it can provide a more global discussion.

6C. Efficiency of the process to control releases during yellowcake processing and identification of release points.

According to the applicant, the bag house is an air and vapor filtration unit mounted directly above the drying chamber so that dry solids collected on the bag filter surfaces can be batch discharged back to the drying chamber. The bag house will be heated to prevent condensation and will be kept under negative pressure. The condenser will be located downstream of the bag house and will be water cooled. Uranium particulates that pass through the bag filters will be wetted and entrained in the condensing moisture within this unit. The applicant did not demonstrate the efficiency of this process or identify the point of discharge.

EMC stated that the point of discharge is in the central processing plant. EMC indicated that section 3 of the application has a good description of the vacuum dryer.

6D. Hourly checking and logging of parameters related to yellowcake stack emission control equipment.

The applicant stated that during routine operations, the air pressure differential gauges for other emission control equipment will be observed and documented at least once per shift during dryer operations. 10 CFR 40, Appendix A, Criterion 8, states that checks must be made and logged hourly of all parameters (e.g., differential pressures and scrubber water flow rates) that determine the efficiency of yellowcake stack emission control equipment operations.

EMC understands the issue.

6E. Monitoring, and reducing to ALARA, stack gaseous effluents.

10 CFR 40 Appendix A, Criterion 8, requires milling operations to be conducted so that all airborne effluent releases are reduced to levels ALARA. The primary means of accomplishing this must be by means of emission controls. The applicant plans to discharge gaseous effluents outside the plant building through the plant stack, but has not demonstrated how the gaseous effluents will be monitored and reduced to levels ALARA.

EMC will provide more detail to address this issue.

6F. Monitoring ventilation system gaseous effluents.

The applicant stated that the ventilation system will exhaust air from within the plant to outside the plant building; however, the applicant has not demonstrated how the gaseous effluents will be monitored.

EMC understands this issue.

7. Adequacy of monitoring program to detect and control gamma radiation from uranium decay products.

The applicant stated that the external gamma survey meters will have a detection range of 100 uR/hr to 5 mR/hr. The applicant also stated that radiation dose rates may exceed 5 mrem

per hour. The staff cannot verify if the external radiation exposure monitoring program is sufficient to detect and control gamma radiation from uranium decay products.

EMC indicated that it will review the monitoring program and recognized that it will need to use instruments that can detect the levels of radiation anticipated at the facility.

8. Information on lower limits of detection on beta and gamma radiation survey instruments.

The applicant identifies several types of portable radiation meters to conduct beta and gamma surveys. The staff cannot verify if the monitoring equipment has a lower limit of detection that allows measurement of 10% of the applicable limits.

EMC stated it will address this issue.

9. Frequency of beta surveys.

The applicant states that they will perform beta surveys at least once for each operation and whenever there is a change in procedures or equipment that may affect the beta dose. The staff cannot determine what is meant by "at least once for each operation".

EMC will clarify this issue.

10. Adequacy of beta personnel monitoring.

The applicant plans to conduct beta surveys in the plant but does not identify personnel monitoring for beta. The staff cannot verify if the monitoring program is adequate to protect workers from the hazards of beta radiation.

EMC indicated that it will use OSLs for beta monitoring. EMC will expand the discussion of this topic.

11. Alternative action levels based on quarterly rather than monthly bioassay sampling.

The applicant indicated that it will follow the corrective actions in Table 1 of Regulatory Guide 8.22. This is a corrective action program based on monthly urinary uranium results. The applicant indicates that will conduct quarterly sampling. The staff cannot verify if the proposed bioassay program is consistent with Regulatory Guide 8.22.

EMC indicated that it plans to use the action levels from Table 1 of 8.22. Employees would be on different testing frequencies, the frequency will depend on the employees' responsibilities. EMC will clarify this issue.

12. Basis for use of Class D for DAC.

In Section 5.7.4 of the technical report, the applicant states that exposures to airborne uranium will be compared to the Derived Air Concentration for the "D" class for natural uranium from Appendix B of 10 CFR 20. This is 5.0 E-10 uCi/ml. The applicant has not provided a technical

basis for selecting the Class “D” for airborne uranium. The staff cannot verify if the proper classification and DAC is being used to show compliance with 10 CFR 20 Subpart C.

NRC staff commented on EMC’s assumption that NRC does not accept the Cogema paper (Health Physics, March 1997, 418-422). NRC staff made it clear that it accepts for review all information submitted by an applicant or licensee and perform its own independent analysis of those submittals.

EMC asked how it could proceed with its application without knowing the inhalation class of the yellowcake. NRC staff responded that applicants need to take all forms of uranium in the plant into consideration and that one possible approach would be to assume a conservative value until a site-specific value for its operations could be determined. Staff further responded that assuming an inhalation class W would be adequately conservative for radiation dose calculations. However, assuming an inhalation class W would not be considered conservative for the purpose of protecting the kidney in accordance with 10 CFR 20.1201(e).

EMC indicated it based its selection of the DAC based on a study done at COGEMA. EMC also indicated that without actually drying its product it’s all an assumption. EMC identified the difficulties in calculating a DAC based on Reg Guide 3.51. EMC noted that Class D is most conservative.

13. Urinalysis as the sole bioassay technique.

The applicant states that it will use urinalysis as the method of bioassay due to the high solubility of the chemical form of yellowcake. The applicant has not provided justification for using the Class “D” inhalation for uranium in air. Regulatory Guide 8.22 recommends that for exposures to Class “W” or Class “Y” material, in vivo lung counting or alternate sampling times and action levels should be considered.

EMC indicated that its application was based on assumption that we have class D, but will reconsider this assumption.

14. No discussion of limiting soluble uranium intake to 10 mg per week.

The staff notes that 10 CFR 20.1201(e) requires a limit of 10 mg/week of uranium in consideration of the chemical toxicity. The applicant does not address this limit.

EMC recognized that a discussion of limiting soluble uranium intake is not present in the application.

15. Method for evaluating positive bioassays.

The applicant does not discuss a method for assigning a dose for positive bioassay results. The applicant needs to provide a technical basis for how the uptake will be converted to a dose and assigned to the individual in accordance with 10 CFR 20 Subpart C. The staff indicated that Regulatory Guide 8.22, “Bioassay at Uranium Mills” is still available.

EMC recognized that the staff wants to understand how the dose will be calculated in case of an uptake. EMC indicated that the proposed method was based on airborne sampling results.

16. Detection of surface contamination by Ra-226.

The applicant stated that it will perform surface contamination surveys of operating and clean areas of the facility. The applicant plans to use 25% of the removable contamination as defined in Table 2 of Regulatory Guide 8.30. This represents 250 dpm/100 cm². The removable contamination limit for Ra-226 is 20 dpm/100 cm². The applicant has not provided sufficient information regarding the ability to account for and detect Ra-226, as defined in Enclosure 2 to Policy and Guidance Directive 83-23, as well as other possible contaminants that may be present as a result of the uranium recovery operations.

EMC indicated that 25% action is based on 1000 dpm for uranium and daughters. The 25% action limit is not based on 20 dpm radium-226 limit. EMC does not agree with the staff's assessment.

17. Detection of Ra-226 during personnel monitoring.

The applicant states that any gross alpha contamination on the skin or clothing will be considered removable and will be subject to the limit of 1000 dpm/100 cm². The removable contamination limit for Ra-226 is 20 dpm/100 cm². The applicant does not provide sufficient information regarding its ability to account for and detect Ra-226 as defined in Enclosure 2 to Policy and Guidance Directive 83-23, as well as other possible contaminants that may be present as a result of the uranium recovery operations.

EMC indicated that RG 8.3 states that alpha contamination is removable and 1000 dpm applies.

18. Contamination monitoring of hand carried items.

The applicant states that hand carried items used in the well fields and controlled areas will also be monitored for surface contamination. The applicant needs to define the contamination control program in more detail and what action limits will be used to control contamination. For example, will hand-carried items be monitored at the central processing facility or will they be monitored in the field? If the applicant plans to check the hand-carried items in the field, what instruments will be used?

EMC indicated that its staff could survey out an item and take it to a well field. Items such as tools, sample bottles, and clipboards would not be leaving the site or going home.

19. Beta surveys of operations involving direct handling of large quantities of aged yellowcake.

The applicant does not address how it plans to conduct beta surveys in the plant and what action levels will be taken to protect personnel working in potential beta and gamma radiation fields.

EMC recognized that this question relates to contamination.

20. Qualifications of individuals performing contamination surveys for release from restricted and controlled areas.

The applicant states that the Radiation Safety Officer (RSO), the radiation safety staff, or properly trained employees perform surveys of all items removed from the restricted areas with the exception of small, hand-carried items described in open issue 19. The staff is looking for EMC to define the term “properly trained.”

EMC stated that properly trained employees will be used to perform surveys for release from restricted and controlled areas. EMC indicated that flexibility is a requirement as occasionally resin shipments may be made outside of normal hours. EMC indicated that RSO and RST qualifications may be needed if operators are going to release resins.

21. Information about the minimization of contamination in the design of the facility.

This issue was resolved by the NRC staff during the call. The staff recognized that 10 CFR 20.1406 is not applicable because of the provisions contained in 10 CFR 20.1401.

The NRC staff did not request a response from EMC on this issue.

22. Clarification of Quality Assurance (QA) organization.

The applicant needs to identify the person with the ultimate authority for the QA Program at the site.

EMC addressed this issue in a response to an RAI, and submitted a QA plan that it planned to implement. EMC will clarify this issue in its response to these open issues.

23. Discussion of routine quality control checks.

The applicant has not provided enough information regarding the routine quality control checks for acceptable performances, such as background checks, reference checks, and the use of control charts to track trends.

EMC stated that quality control checks are contained in its radiation protection procedures, but can provide it in the application.

24. Incorporation of data acquired through non-direct measurements into QA/QC program.

The applicant stated that data acquired through non-direct measurements may include data from historical databases, literature references, background information from historical facility

files, climatic data, and regional geology or hydrology description. NRC staff cannot determine how data acquired through non-direct measurements will be incorporated into the QA/QC program including, for example, record keeping and verification and validation.

EMC acknowledged the issue.

25. Discussion of corrective action program integrating QA components.

The applicant has not discussed a corrective action program at the site that integrates components of the Quality Assurance Program.

EMC will address this issue.

MISCELLANEOUS ISSUES

A summary of the issues identified and EMC's responses are presented below.

1. Justification for using Antelope ACC met data to represent Moore Ranch meteorology.

The applicant provided topography photos and seasonal wind roses for the Glenrock Coal Company and Antelope Coal Company (ACC) sites. However, the applicant did not provide sufficient information regarding the representativeness of the meteorology of the ACC site to Moore ranch.

EMC recognized that the subject of the RAI response was not adequate. EMC indicated that this issue was discussed with High Plains Uranium. EMC does not understand what further information needs to be provided.

2. Demonstration that Antelope Coal ACC data represents long-term meteorological conditions.

The applicant did not compare the 10 years of data from ACC to the longer term data from ACC to demonstrate that the period of data used is representative of long-term meteorological conditions in the site vicinity.

EMC will review this issue.

3. Wind speed and direction data not consistent in Technical Report.

In Table 2.5-9 of the Technical Report, the applicant reports wind direction recovery as 45.25% for ACC. This is not consistent with the wind direction recovery data in Table 2.5-6. The staff notes that the wind direction recovery data is not consistent.

EMC will review this issue.

4. No annual wind rose provided.

The applicant provides seasonal wind roses but did not provide an annual wind rose summary.

EMC recognized that it did not include an annual wind rose.

5. Mixing height data representative of the Moore Ranch site.

The applicant discussed three sources of inversion and mixing height data in the Technical Report but did not propose a source of mixing height data that is representative of the Moore Ranch site.

EMC indicated that its meteorologist will look at this issue.

6. Calibration of meteorological data collection system.

Regulatory Guide 3.63 states that the system should be calibrated at least semiannually to ensure that the system accuracies in this guide are met. The applicant has not provided sufficient information demonstrating that the meteorological system at the ACC site was calibrated in accordance with Regulatory Guide 3.63.

EMC indicated it addressed this issue in response to RAI 5-12, Appendix B4. EMC will clarify this issue with the NRC staff.

7. Adequacy of monitoring well ring.

Uranium One used groundwater modeling of the ore zone “70 sand” unconfined aquifer to show hydraulic communication between the wellfield and the monitoring ring wells located 500 feet away and 500 feet apart. This communication will be verified by field pumping tests. NRC staff notes that although hydraulic communication with the well ring may be established, this does not confirm that the well spacing is sufficient to detect an excursion. Given the small radial extent of the cone of depression developed in extraction wells in the unconfined aquifer (potentially less than 100 ft at extraction rate limits), it is possible that an excursion could pass undetected between the monitoring wells located 500 feet apart. Uranium One is requested to provide evidence that this spacing is sufficient to detect an excursion in the “70 sand” unconfined aquifer.

EMC will address this issue.

8. Qualifications of non-RSO personnel to conduct inspections.

Applicant states that the RSO, Radiation Safety Technician, or a qualified designee will conduct a daily walkthrough inspection of the plant. The applicant does not define how it will determine the qualified designee.

EMC will address this issue.

9. Qualification of QA personnel.

Uranium One stated the Senior Environmental Specialist (SES) will manage the majority of QA/QC activities and report directly to this manager. The QA plan did not indicate if the SES would be located on the specific site. The SES was not listed as a key site person in the corporate and site management structure at Moore Ranch. As the SES is identified in this plan as the person responsible for almost all QA activities in the field and laboratory, his or her placement in the organization is requested.

The applicant stated that QA staff will perform independent assessments of environmental monitoring activities and will be qualified as lead assessors. The applicant did not describe how this qualification would be attained.

EMC will address this issue.

Due to time constraints, items 10 through 15 as presented in the original meeting agenda posted on July 16, 2009 were not discussed during the meeting. They are included here to maintain consistency with the original meeting agenda.

- 10. Procedure for updating monitoring plan.**
- 11. Discussion of standard procedures for sampling.**
- 12. Lack of discussion of decontamination of sample containers and equipment.**
- 13. Site specific records management plan.**
- 14. Discussion of functions of onsite and subcontract labs and their QA programs.**
- 15. Discussion of corrective action program integrating QA components.**

ACTIONS:

NRC will prepare a summary of the conference call.

EMC will respond to the issues discussed.

Public Participation.

None of the members of the public asked questions, when given the opportunity near the conclusion of the conference call.

The meeting concluded at 1:00 p.m.

ATTACHMENTS: 1. Meeting Agenda
2. Attendee List

MEETING AGENDA
Uranium One/Moore Ranch ISR
July 27, 2009

MEETING PURPOSE: Teleconference to Discuss Radiological and Miscellaneous Issues Relating to Moore Ranch ISR License Application.

MEETING PROCESS:

<u>Time</u>	<u>Topic</u>	<u>Lead</u>
10:00 a.m.	Introductions	All
	Discussion of Radiological Issues (list of issues attached)	All
	Discussion of Miscellaneous Issues (list of issues attached)	All
	Summary of Action Items	Moderator
	Public Comment/Questions	Moderator
1:00 p.m.	Adjourn	

Radiological Issues
Uranium One/Moore Ranch ISR
July 27, 2009

1. Air sampling for less than 12 months.
2. Lack of livestock sampling not justified.
3. Lack of crop sampling not justified.
4. Baseline groundwater sampling for less than 12 months.
5. Baseline surface water sampling for less than 12 months.
6. Surface water sampling results not identified as suspended or dissolved.
7. Adequacy of monitoring program to detect and control gamma radiation from uranium decay products.
8. Information on lower limits of detection on beta and gamma radiation survey instruments.
9. Frequency of beta surveys.
10. Adequacy of beta personnel monitoring.
11. Alternative action levels based on quarterly rather than monthly bioassay sampling.
12. Basis for use of Class D for DAC.
13. Urinalysis as the sole bioassay technique.
14. No discussion of limiting soluble uranium intake to 10 mg per week.
15. Acceptable method for evaluating positive bioassays.
16. Detection of surface contamination by Ra-226 and other naturally occurring daughter products.
17. Detection of Ra-226 and other naturally occurring daughter products during personnel monitoring.
18. Contamination monitoring of hand carried items.
19. Beta surveys of operations involving direct handling of large quantities of aged yellowcake.
20. Qualifications of individuals performing contamination surveys for release from restricted and controlled areas.
21. Information about the minimization of contamination in the design of the facility.

22. Clarification of QA organization.
23. Discussion of routine quality control checks.
24. Incorporation of data acquired through non-direct measurements into QA/QC program.
25. Discussion of corrective action program integrating QA components.

Miscellaneous Issues
Uranium One/Moore Ranch ISR
July 27, 2009

1. Justification for using ACC met data to represent Moore Ranch meteorology.
2. Demonstration that ACC data represents long-term meteorological conditions.
3. Wind speed and direction data not consistent in Technical Report.
4. No annual wind rose provided.
5. Mixing height data representative of the Moore Ranch site.
6. Calibration of meteorological data collection system.
7. Adequacy of monitoring well ring.
8. Qualifications of non-RSO personnel to conduct inspections.
9. Qualification of QA personnel.
10. Procedure for updating monitoring plan.
11. Discussion of standard procedures for sampling.
12. Lack of discussion of decontamination of sample containers and equipment.
13. Site specific records management plan.
14. Discussion of functions of onsite and subcontract labs and their QA programs.
15. Discussion of corrective action program integrating QA components.