

February 23, 2010

MEMORANDUM TO: Bill Von Till, Chief
Uranium Recovery Licensing Branch
Division of Waste Management
and Environmental Protection
Office of Federal and State Materials
and Environmental Management Programs

FROM: Ronald A. Burrows, Project Manager **/RA/**
Uranium Recovery Licensing Branch
Division of Waste Management
and Environmental Protection
Office of Federal and State Materials
and Environmental Management Programs

DATE/TIME: March 8, 2010
10:00 a.m. - 4:00 p.m.

LOCATION: U.S. Nuclear Regulatory Commission
Two White Flint North, Room T08C01
11545 Rockville Pike
Rockville, MD 20852

Newly scheduled Revised Canceled

APPLICANT: Crow Butte Resources, Inc./North Trend Expansion Area

DOCKET: 04008943

PURPOSE: Teleconference to Discuss Open Issues Relating to North Trend
Expansion Area ISR License Amendment.

PARTICIPANTS: NRC Offices Applicant
Stephen Cohen Larry Teahon
Ron Burrows et al.
Tom Lancaster
et al.

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CATEGORY: Category 1. The public is invited to observe this meeting and will have opportunities to communicate with the NRC staff after the business portion, but before the meeting is adjourned. **Interested members of the public can participate in this meeting via a toll-free teleconference. For details, please call the NRC meeting contact by March 3, 2010.**

ENCLOSURE: Agenda

NOTE: The NRC's Policy Statement "Enhanced Public Participation in NRC Meetings," May 28, 2002, applies to this meeting. The Policy Statement may be found on the NRC Web site, www.nrc.gov, and contains information regarding visitors and security.

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MEETING AGENDA
Crow Butte Resources, Inc. / North Trend Expansion Area
March 8, 2010

MEETING PURPOSE: Teleconference to Discuss Issues Relating to North Trend Expansion Area ISR License Amendment.

MEETING PROCESS:

<u>Time</u>	<u>Topic</u>	<u>Lead</u>
10:00 a.m.	Introductions	All
	Discussion of Process and Restoration Issues (list of issues attached)	All
	Break for lunch	All
	Discussion of Radiological Issues (partial list of issues attached)	All
	Discussion of Miscellaneous Issues (list of issues attached)	All
	Additional Issues as time allows (if needed)	All
	Summary of Action Items	Moderator
	Public Comment/Questions	Moderator
4:00 p.m.	Adjourn	

Enclosure

Process and Restoration Issues
Crow Butte Resources, Inc. / North Trend Expansion Area
March 8, 2010

Open Issues:

1. Confirmation of backup disposal capacity
2. Confirm that a minimum of six sample locations will be used to establish baseline values for a wellfield
3. Reporting for excursion corrective actions
4. Confirm that the liquid disposal capacity is adequate
5. Justification for not including the complete list of parameters from NUREG-1569 in restoration plan
6. Confirm that any proposed ACL must be approved by NRC and not through the SERP process
7. Commit to hydraulic control from start of production to stabilization
8. Confirm that the stabilization period will be sufficient to determine restoration success
9. Include corrective actions during stabilization
10. Provide techniques for statistical trend analysis of stability data
11. Correct pore volume calculations; provide flare factors
12. Comment on the applicability of restoration analogues to the proposed larger wellfields
13. Document sampling procedures/analysis to establish that restoration goals are met
14. Acknowledge that NRC will not use the restoration goal of average plus two standard deviations

Administrative Items

1. Incorrect flow arrow direction on Figure 6.1-1
2. Carbon dioxide in the lixiviant composition
3. Calculation of the UCL

Radiological Issues
Crow Butte Resources, Inc. / North Trend Expansion Area
March 8, 2010

Open Issues:

1. Justification for radon release rates from the wellfield, resin transfer and venting, and plant vent
2. Please provide details on how radon progeny will be factored into determining compliance with 10 CFR 20.1301/1302 during operations.
3. The applicant has not addressed the potential for beta exposure and surveys for beta radioactivity resulting from spills or maintenance activities.
4. The applicant has not addressed the potential for beta exposure and surveys for beta radioactivity resulting from spills or maintenance activities.
5. The applicant has not provided technical basis for using Class D for natural U as an inhalation class.

Confirmatory Items

1. Is the LLD of U in air $5E-11$ (0.00000000005) or $8.35E-5$?
2. Verify that the ALARA program includes a commitment to minimize exposures to the public (e.g. ALARA goals).

Administrative Items

1. Use consistent notation (5×10^{-11} or $5E-11$ (e.g. 0.00000000005) vs. $5e^{-11}$ (e.g. $8.35E-5$))
2. Compliance with §20.1208 for declared pregnant women.

Miscellaneous Issues
Crow Butte Resources, Inc. / North Trend Expansion Area
March 8, 2010

Quality Assurance - Non-radiological Monitoring

Open Issues:

1. Confirm non-radiological quality assurance program
2. Document the organizational structure and responsibilities of managerial and operational staff for the non-radiological QA/QC program
3. Confirm specifications of personnel qualifications
4. Document written procedures for the non-radiological monitoring program activities
5. Document records management
6. Document quality control program
7. Document non-radiological data verification and validation
8. Document QA/QC program assessments and audits
9. Document QA/QC preventive and corrective actions

Management Programs

Open Issues:

1. Delegation of survey responsibilities to designated personnel
2. Weekly inspections

Confirmatory Items:

1. Health Physics training for designated personnel

Accidents

Open Issues:

1. Actions and equipment to stop major tank or pipe failure
2. Procedures in the event of wildfire encroachment