

**CAMECO RESOURCES  
CROW BUTTE OPERATION**



86 Crow Butte Road  
P.O. Box 169  
Crawford, Nebraska 69339-0169

(308) 665-2215  
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January 18, 2010

Mr. Keith I. McConnell, Deputy Director  
Decommissioning and Uranium Recovery Licensing Directorate  
Division of Waste Management and Environmental Protection  
Office of Federal and State Materials and Environmental Management Programs  
U.S. Nuclear Regulatory Commission  
Mail Stop T8-F5  
Washington D.C. 20555-0001

Re: Annual Report of Changes, Tests, or Experiments  
License No. SUA-1534  
Docket No. 40-8943

Dear Mr. McConnell:

Crow Butte Resources, Inc. (CBR) is providing this annual report summarizing the changes, tests or experiments made under License Condition 9.4 of SUA-1534 during calendar year 2009. This report is made in accordance with the reporting requirements contained in License Condition 9.4 (E).

CBR's source material license was renewed on March 4, 1998. The renewed license contained Performance Based License Conditions (PBLC). In a PBLC, CBR is allowed to make changes or conduct tests and experiments under certain conditions. These changes, tests, and experiments must be reviewed and approved by the CBR Safety and Environmental Review Panel (SERP). During 2009, the CBR SERP approved seven changes.

The following materials are attached to provide the required summary information and documentation required by License Condition 9.4 (E).

- SERP Evaluation Index, which summarizes each SERP Action and tracks any modifications to an approved action affected by subsequent SERP actions.
- A copy of the text of each approved SERP Evaluation. These evaluations describe the change or test approved and the safety and environmental evaluation performed by the SERP. Supporting documentation is maintained on site for NRC review.

## CAMECO RESOURCES



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Mr. Keith McConnell  
January 18, 2010  
Page Two

If you have any questions or require further information, please do not hesitate to contact me at (308) 665-2215 ext 114.

Sincerely,  
CAMECO RESOURCES

A handwritten signature in cursive script that reads "Larry Teahon".

Larry Teahon  
Manager of Health, Safety and Environmental Affairs

Enclosures: As Stated

cc: Mr. Ron Burrows  
Project Manager  
Office of Federal and State Materials and  
Environmental Management Programs  
US Nuclear Regulatory Commission  
Mail Stop T8-F5  
Washington, DC 20555-0001



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**2009 SERP Evaluation Index**



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**Safety and Environmental Review Panel**

**2009 SERP Index**

<b>SERP Evaluation Number</b>	<b>Date</b>	<b>Action Taken</b>	<b>Modifications to Previous SERP Actions</b>
SERP 08-09	19-May-09	Start-up of R.O. Upgrade	None
SERP 09-01	17-Feb-09	Experiment to remove uranium and vanadium from the commercial evaporation ponds	None
SERP 09-02	14-Apr-09	Start-up of the South Booster Pump Station	None
SERP 09-03	21-May-09	Wellhouse 29A Review and Approval	None
SERP 09-04	09-Jul-09	Wells added to Wellhouses 23, 48 & 51	None
SERP 09-05	23-Jul-09	Well added to Wellhouse 47	None
SERP 09-06	2-Oct-09	Wellhouse 52 Review and Approval	None



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**SERP 08-09 Evaluation**



**Crow Butte Resources, Inc.**

**Safety and Environmental Review Panel**

**Evaluation Report – SERP 08-09**

**Reverse Osmosis (R.O.) Upgrade Approval to Operate**

**November 18, 2008**

The Crow Butte Resources, Inc. (CBR) Safety and Environmental Review Panel (SERP) met to review and approve operation of the Reverse Osmosis Upgrade at the Crow Butte Uranium Project.

The SERP appointed for this evaluation consisted of the following members:

<u>Name</u>	<u>Title</u>	<u>Area of Expertise</u>
Jim Stokey	Mine Manager	Management
Larry Teahon	Manager of Environmental, Health and Safety	Environmental
Doug Pavlick	Operations Superintendent	Operations
Rhonda Grantham	Radiation Safety Officer	Radiation Safety
Bob Tiensvold	Maintenance Superintendent	Construction
Steven Boeselager	Restoration Foreman	Restoration

Dr. Stokey is the SERP Chairman. Mr. Teahon was appointed SERP Secretary for this evaluation.

**Purpose of SERP Evaluation**

The purpose of this evaluation by the CBR SERP was to review and approve the start up and operation of the reverse osmosis upgrade with a flow increase from 375 GPM to 600 GPM through fifteen reverse osmosis tubes (five units) located in the R.O. Building.

# CAMECO RESOURCES CROW BUTTE OPERATION



## SERP 08-09

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License Condition 9.4 allows CBR to make changes in the facility or procedures or conduct tests or experiments that are not presented in the approved application if such changes do not:

- i. Result in any appreciable increase in the frequency of occurrence of an accident previously evaluated in the license application (as updated);
- ii. Result in any appreciable increase in the likelihood of occurrence of a malfunction of a structure, system, or component (SSC) important to safety previously evaluated in the license application (as updated);
- iii. Result in any appreciable increase in the consequences of an accident previously evaluated in the license application (as updated);
- iv. Result in any appreciable increase in the consequences of a malfunction of an SSC previously evaluated in the license application (as updated);
- v. Create a possibility for an accident of a different type that any previously evaluated in the license application (as updated);
- vi. Create a possibility for a malfunction of an SSC with a different result than previously evaluated in the license application (as updated);
- vii. Result in a departure from the method of evaluation described in the license application (as updated) used in establishing the final safety evaluation report (FSER) or the environmental assessment (EA) or the technical evaluation reports (TERs) or other analysis and evaluations for license amendments.
- viii. For the purposes of SERP evaluations, SSC means any SSC which has been referenced in a staff SER, TER, EA, or environmental impact statement (EIS) and supplements and amendments.

The SERP evaluation was conducted in accordance with the instructions contained in the Environmental, Health, and Safety Management System (EHSMS) Volume II, *Management Procedures*, EHS-6, *Managing Change*. The SERP reviewed the Reverse Osmosis Upgrade startup checklists and supporting documentation and evaluated this information as compared with the requirements of the licensing basis, including the following documents:

- Title 10, Code of Federal Regulations;
- Source Materials License SUA-1534, Amendment No. 23 dated May 12, 2008;
- *Application for Renewal of USNRC Radioactive Source Materials License SUA-1534*, Crow Butte Resources, Inc. December 1995;
- *Environmental Assessment for Renewal of Source Materials License No. SUA-1534*, USNRC February 1998;
- *Safety Evaluation Report for Renewal of Source Materials License No. SUA-1534*, USNRC February 1998;
- Technical Evaluation Reports issued in support of amendments to SUA-1534.

# CAMECO RESOURCES CROW BUTTE OPERATION



SERP 08-09

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## Title 10 Code of Federal Regulations

The proposed change will have no impact on CBR's ability to meet all applicable NRC regulations.

## Source Materials License SUA-1534 Requirements

Amendment 23 to SUA-1534 dated May 12, 2008 was reviewed for specific requirements related to approval and operation of the Reverse Osmosis circuit.

License Condition 9.3: This License Condition requires that CBR conduct operations in accordance with the representations contained in the LRA. Section 3.1.3 of the LRA discusses construction materials, instrumentation, and monitoring requirements. Section 3.3 also discusses instrumentation, including wellhouse injection and production instrumentation and wet building alarms for wellhouses. Section 7.2.3 of the LRA requires that leak tests be performed on all wellfield piping before placing the system into production operations.

The SERP reviewed the Start-up Checklist for the R.O. circuit. This checklist was developed by the Restoration Foreman to document completion of all required actions before initiating operations in the R.O. circuit. Some of these actions are required by regulatory and licensing requirements, while some were developed over the course of mining experience at Crow Butte.

A copy of the R.O. Upgrade Start-Up Checklist is attached to this SERP Evaluation. Some items on the list require flow through the system in order to test the components. Final sign off of the SERP review will be done once all of the items have successfully passed their initial testing.

## Environmental Assessment

The SERP reviewed the contents of the Environmental Assessment (EA) prepared by NRC in February 1998 to determine whether the proposed change could cause substantive safety or environmental impacts. The increase in R.O. capacity will have no substantive safety or environmental impact.

## Financial Surety

The proposed change is covered in the NRC-approved financial surety maintained by CBR and approved by Amendment 23 to SUA-1534 in the amount of \$25,207,672.

**CAMECO RESOURCES  
CROW BUTTE OPERATION**



**SERP 08-09**

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**Safety Evaluation Report**

The Safety Evaluation Report (SER) principally provides that Crow Butte is authorized to recover uranium from the ore body, at a maximum rate of 5000 GPM, (increased to 9000 GPM by Amendment 22 to SUA-1534 dated November 30, 2007) exclusive of restoration flow, using a lixiviant composed of native groundwater, with added sodium carbonate/bicarbonate and oxygen or hydrogen peroxide. The R.O. upgrade is not specifically addressed in this report.

**Technical Evaluation Reports**

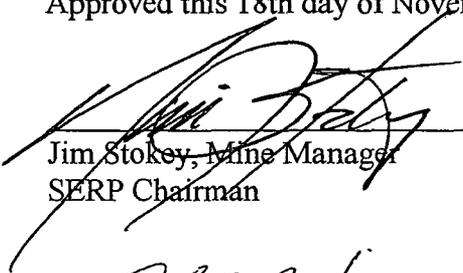
The SERP reviewed the Technical Evaluation Reports (TERs) prepared by NRC staff to support amendments made to SUA-1534 since renewal in 1998. The Technical Evaluation Report dated April 11, 2008 (Docket No. 40-8943) specifically provides NRC staff review of costs associated with groundwater restoration and the efficiency of adding additional R.O. capacity. The NRC staff determined that the cost associated with groundwater restoration was acceptable.

**Degradation of Essential Safety or Environmental Commitment**

SUA-1534 allows CBR to make changes as long as they do not degrade the essential safety or environmental commitments made in the application. The SERP determined that safety commitments made in the LRA and discussed in the EA have been met and that startup of the R.O. circuit will not degrade the safety and environmental commitments.

Based upon this evaluation of the licensing basis, the CBR SERP hereby approves startup and operation of the Reverse Osmosis Upgrade.

Approved this 18th day of November, 2008.

  
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Jim Stokey, Mine Manager  
SERP Chairman

5-19-09

  
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Doug Pavlick, Operations Superintendent

**CAMECO RESOURCES  
CROW BUTTE OPERATION**



**SERP 08-09**

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Larry Teahon 4/27/09  
Larry Teahon, Manager of Environmental, Health and Safety  
SERP Secretary

Rhonda Grantham 4/27/09  
Rhonda Grantham, Radiation Safety Officer

Bob Tiensvold 5/19/2009  
Bob Tiensvold, Maintenance Superintendent

Steven Boeselager 4-30-09  
Steven Boeselager, Restoration Foreman

## R.O. Plant Start-UP Checklist

Item	Description	Person	Task Completed
1	Fill IX- C&D	Boeselager	x
2	Resolve pressire issues with IX C & D	Boeselager/Pavlick	x
3	Pipe sump effluent to plant and tie into waste tank	T. Lemmon	x
4	Pressure test piping from RO plant	T. Lemmon	x
5	Order and install 6" check valve	T. Lemmon	x
6	Purchase remaining filter membranes	Boeselager	x
7	Wire control panel for 100 gallon tank	Tiensvold	x
8	Control screens	Hagman	x
9	Order PL-3 seal and interconnector lube	Boeselager	x
10	Order CC103 Biocide for membrane tubes	Boeselager	x
11	Verify that we have anti-scalent	Boeselager	x
12	Determine antiscalent feed rate	Boeselager/Pavlick	x
13	Verify reductant mixer workds	Boeselager	x
14	ORC meeting		x
15	SERP meeting		x
16	Operate under standing radiation work permint	Grantham	x
17	removal of old membranes	Boeselager	x
18	Pressure test columns and piping to operating pressure	T. Lemmon	<i>Pending <del>x</del> operation</i>
19	Apply PL-3 to membrane seals and interconnectors	T. Lemmon	x
20	Insert membranses in top 3 tubes	T. Lemmon	x
21	Other membranes will be added as needed	Boeselager/T.Lemmon	<i>Add as Needed.</i>
22	Locate Halliburton hand held meter	Boeselager	x

23	Install water blocks	Boeselager/Operators	x
24	End water blocks will be added as needed	Boeselager	<i>As Needed</i>
25	Notify plant operators of start-up	Boeselager/Pavlick	x
26	Place brine in commercial evaporation ponds	Boeselager/Pavlick	x
27	Start system	Boeselager/Pavlick	x
28	Operate during the day for minimum of one week	Boeselager/Pavlick	x
29	Re-evalute system and update SOP once the system is running	Boeselager/Pavlick	<i>Updated as operation continues.</i>
30	Determine reductant feed rate	Boeselager	x
31	Move reductant feed tank	Boeselager/T.Lemmon	x
32	Confirm reductant level indicator is hooked up	Tienvold	x <i>Calibrate</i>
33	Will need to move level indicator wire when tank is moved	Tienvold	x
34	Install filter bags	T. Lemmon	x
35	Install perm and brine spool pieces	T. Lemmon	x
36	Wire up ph meter	Tienvold	x
37	Confirm waste line flow meter works (after startup)	Hagman	x
38	Confirm RO flow meter works (after startup)	Hagman	x
39	Confirm Perm line flow meter works (after startup)	Hagman	x
40	Get filter DP switch hooked up and alarms at the plant	Tienvold	x
41	Make sure reductant pump is hooked up	Tienvold	x
42	Check correct valve positioning for the system	Boeselager/T.Lemmon	x
43	Label control panel (what bank goes with which set of tubes)	T. Lemmon	x
44	Check operation of PRV's	Boeselager/T.Lemmon	<i>Checked on Start-Up</i>
45	replace 1/4 ball valves on tube ends (need to be lockable)	Boeselager/T.Lemmon	x
46	replace hingelock victaulics	Boeselager/T.Lemmon	x
47	re-route sump and bleed flows to alternate piping	Boeselager/T.Lemmon	x

48	Install CO2 stripper and associated piping	Contractor	x
49	move perm pump	Contractor	x
50	install 4th booster pump and new VFD	B.Lemmon	x
51	pipe plant injection water to RO line and install new meter	Boeselager	x
52	add new injection line from RO to MU 3 and install new meter	Wellfield Construction	x
53	re-build RO 3	Wellfield Construction	x
54	add new MU 2 trunklines	Wellfield Construction	x
55	move reductand tank vent fan and associated piping	Boeselager	x

Date: 4-27-09

Initial: SB

Signature: Steven Boeselager

*This sheet replaced w/ New attached check-off list.*

R.O. Plant Start-Up Checklist

2008  
Date

Item	Description	Person	Comments	Completed	Initial
1	Fill IX-A, B, C & D	Boeselager/Boe			SM
2	Resolve pressure issues with IX C & D system	T. Lemon/Boeselager/Boe			
3	Pipe sump effluent to plant and tie into waste tank	T. Lemon/Boe		7-Jul x	
4	Pressure test piping from RO to plant	Boeselager/T. Lemon/Boe		8-Jul x	
5	Re-pipe the witches hats <i>NOT Before START</i>	T. Lemon/Boe			
6	Order 6 inch check valve	B. Tinsvold/Boeselager/Boe			SB
7	Install 6 inch check valve	T. Lemon/Boe		8-19-08	TL
8	Purchase Membranes for 1 set (3) Tubes	Boeselager/Boe		7-Jul x	CEB
9	Wire & control panel for 100 gallon tank	Tinsvold/Boe		2-Jul x	CM
10	Control Screens	Hagman/Boe			TH
11	Test/Calibrate Flow Meter ✓	Boeselager/Boe		7-Jul x	CEB DUPLICATE
12	Order PL-3 seal & interconnector tube	Boe/Boe	Received	7-Jul x	CEB
13	Order CC103 Biocide to disinfect tubes during pressure test	Boe/Boe	Received	7-Jul x	CEB
14	Check MSDS for Biocide	Pavlick/Boe		8-Jul x	R. H.
15	Provide Safety MSDS Sheets	Herrick/Boe		8-Jul x	R. H.
16	Verify have Pre-treat Plus 0100 anti-scalent	Boeselager/Boe/Boe	2 - 55 gal. drums	7-Jul x	CEB
17	Determine antiscalent feed rate	Boeselager/Boe/Boe	Have conc. need flow.		
	Verify mixer for reductant feed works	Boeselager/Boe		7/4	SB
19	Operations Review Committee (ORC) meeting	Boe/Boe		7-Jul	CEB
20	Safety & Environmental Review Panel (SERP) meeting	Boe/Boe		9/1	
21	Operate Under <del>Standard</del> <sup>STANDING</sup> Radiation Work Permit	Grantham/Boe		7-Jul	by
22	Radiation safety to <del>clear</del> <sup>REMOVE</sup> old membranes	Boeselager/Grantham/T. Lemon/Boe		7/2	SB
23	Dispose of old membranes in super sacks	Boeselager/Grantham/T. Lemon/Boe		7/3	SB
24	Disinfect columns using CC103 biocide during pressure test	Boeselager/T. Lemon/Boe			
25	Pressure test columns & Piping <sup>TO</sup> >15% over op. pressure	Boeselager/T. Lemon/Boe			
26	Apply PL-3 to membrane seals & interconnectors	Boeselager/T. Lemon/Boe			
27	Insert membranes in top 3 R.O. columns (#5)	Boeselager/T. Lemon/Boe			
28	Close valves to all other R.O. columns <sup>&amp; LOCK OUT</sup> NOT IN USE	Boeselager/T. Lemon/Boe			
29	Locate and test Halliburton hand-held flow meter.	Boeselager/Boe		7/7	SB
30	Install water-blocks	Boeselager/Boe			
31	Notify plant operators of start-up (coordination)	Boeselager/Boe/Boe		9/2	
32	Place brine in commercial evaporation ponds	Pavlick/Boe			
33	Start system	Boeselager/Boe		9/2	
34	Update SOP, as necessary	Boeselager/Boe/Boe			
35	Operate during day only for a minimum of one week	Boeselager/Boe/Boe		9/9	
36	Re-evaluate system	Boeselager/Boe/Boe			



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**SERP 09-01 Evaluation**

**CAMECO RESOURCES  
CROW BUTTE OPERATION**



**SERP 09-01**

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**Crow Butte Resources, Inc.**

**Safety and Environmental Review Panel**

**Evaluation Report – SERP 09-01**

**Test to Remove Uranium from the Commercial Evaporation Ponds**

**February 17, 2009**

The Crow Butte Resources, Inc. (CBR) Safety and Environmental Review Panel (SERP) met to review and approve a limited test in the Commercial Processing Plant (CPP) to remove uranium from the commercial evaporation ponds.

The SERP appointed for this evaluation consisted of the following members:

<u>Name</u>	<u>Title</u>	<u>Area of Expertise</u>
Jim Stokey	General Manager	Management
Larry Teahon	Manager of Health, Safety, and Environmental Affairs	Safety
Doug Pavlick	Operations Manager	Operations
Rhonda Grantham	Radiation Safety Officer	Radiation Safety
Ron Herrick	Safety Supervisor	Safety
Bob Tiensvold	Maintenance Superintendent	Construction
Steven Boeselager	Restoration Foreman	Restoration

Dr. Stokey is the SERP Chairman. Mr. Teahon was appointed SERP Secretary for this evaluation.

**Purpose of SERP Evaluation**

# CAMECO RESOURCES CROW BUTTE OPERATION



## SERP 09-01

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The purpose of this evaluation by the CBR SERP is to review and approve a test in the CPP that will assess the effectiveness of removing uranium from the commercial evaporation ponds with ultimate disposal of the waste water down the deep disposal well.

The test utilizes filtration, pH adjustment using HCL, ion exchange (IX) with resin, elution of the resin with strong HCL solution, followed by uranium recovery.

### Test design:

- Bulk holding tank.
- Upflow column with 5cuft of resin specifically engineered to be eluted with HCL.
- Conditioning tank for adjusting the pH of the pond water.
- Elution vessel.
- Filtration unit.
- System vented through the bead shaker deck.

### Test process:

- Water used in the test will be hauled with a Water Truck from the Commercial Evaporation Pond #1 to the bulk holding tank.
- The water will be conditioned in the bulk holding tank by adding HCL from the feed system in the plant until the pH is lowered to 4.0 to 5.0.
- The conditioned water will then be filtered and passed through the upflow column at a rate of 5 GPM.
- Resin samples will be collected hourly to monitor the loading of the resin.
- Loaded resin will be eluted with 7% HCL.
- Waste water will overflow into a small tank and then transferred to the waste disposal tank.
- Repeat test if necessary.

The design and process documents are attached as part of the SERP assessment. Final assessment of the test(s) will also be attached to this SERP.

License Condition 9.4 allows CBR to make changes in the facility or procedures or conduct tests or experiments that are not presented in the approved application if such changes do not:

- i. Result in any appreciable increase in the frequency of occurrence of an accident previously evaluated in the license application (as updated);

## CAMECO RESOURCES CROW BUTTE OPERATION



### SERP 09-01

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- ii. Result in any appreciable increase in the likelihood of occurrence of a malfunction of a structure, system, or component (SSC) important to safety previously evaluated in the license application (as updated);
- iii. Result in any appreciable increase in the consequences of an accident previously evaluated in the license application (as updated);
- iv. Result in any appreciable increase in the consequences of a malfunction of an SSC previously evaluated in the license application (as updated);
- v. Create a possibility for an accident of a different type that any previously evaluated in the license application (as updated);
- vi. Create a possibility for a malfunction of an SSC with a different result than previously evaluated in the license application (as updated);
- vii. Result in a departure from the method of evaluation described in the license application (as updated) used in establishing the final safety evaluation report (FSER) or the environmental assessment (EA) or the technical evaluation reports (TERs) or other analysis and evaluations for license amendments.
- viii. For the purposes of SERP evaluations, SSC means any SSC which has been referenced in a staff SER, TER, EA, or environmental impact statement (EIS) and supplements and amendments.

The SERP evaluation was conducted in accordance with the instructions contained in the Environmental, Health, and Safety Management System (EHSMS) Volume II, *Management Procedures*, EHS-6, *Managing Change*. The SERP reviewed the supporting documentation and evaluated this information as compared with the requirements of the licensing basis, including the following documents:

- Title 10, Code of Federal Regulations;
- Source Materials License SUA-1534, Amendment No. 23 dated May 12, 2008;
- *Application for Renewal of USNRC Radioactive Source Materials License SUA-1534*, Crow Butte Resources, Inc. December 1995;
- *Environmental Assessment for Renewal of Source Materials License No. SUA-1534*, USNRC February 1998;
- *Safety Evaluation Report for Renewal of Source Materials License No. SUA-1534*, USNRC February 1998;
- Technical Evaluation Reports issued in support of amendments to SUA-1534.

#### **Title 10 Code of Federal Regulations**

The proposed change will have no impact on CBR's ability to meet all applicable NRC regulations.

**CAMECO RESOURCES  
CROW BUTTE OPERATION**



**SERP 09-01**

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**Source Materials License SUA-1534 Requirements**

Amendment 23 to SUA-1534 dated May 12, 2008 was reviewed for requirements related to conducting tests and experiments. It was determined that this test meets the requirements as outlined in the amendment.

**License Condition 9.3:** This License Condition requires that CBR conduct operations in accordance with the representations contained in the LRA. Section 3.1.3 of the LRA discusses construction materials, instrumentation, and monitoring requirements.

A description of the materials used in this test is attached to this SERP report.

**Environmental Assessment**

The SERP reviewed the contents of the Environmental Assessment (EA) prepared by NRC in February 1998 to determine whether the proposed test could cause substantive safety or environmental impacts.

The proposed test, if successful, will have a positive impact on the environment in that a potential source of contamination will be removed from the evaporation ponds.

**Financial Surety**

The proposed change is covered in the NRC-approved financial surety maintained by CBR and approved by Amendment 23 to SUA-1534 in the amount of \$25,207,672.

**Safety Evaluation Report**

The Safety Evaluation Report (SER) principally provides that Crow Butte is authorized to recover uranium from the ore body, at a maximum rate of 5000 GPM, (increased to 9000 GPM by Amendment 22 to SUA-1534 dated November 30, 2007) exclusive of restoration flow, using a lixiviant composed of native groundwater, with added sodium carbonate/bicarbonate and oxygen or hydrogen peroxide. The SERP determined that the test will have no impact on CBR's ability to continue to meet the commitments cited in the SER.

A Job Hazard Analysis of this test is attached to this SERP assessment.

**Technical Evaluation Reports**

CAMECO RESOURCES  
CROW BUTTE OPERATION



SERP 09-01

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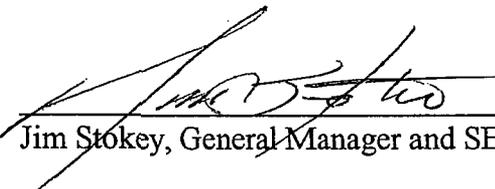
The SERP reviewed the Technical Evaluation Reports (TERs) prepared by NRC staff to support amendments made to SUA-1534 since renewal in 1998. This test has not been addressed by any prior TERs.

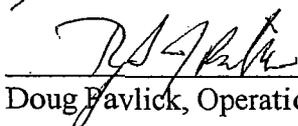
**Degradation of Essential Safety or Environmental Commitment**

SUA-1534 allows CBR to make changes as long as they do not degrade the essential safety or environmental commitments made in the application. The SERP determined that safety commitments made in the LRA and discussed in the EA have been met and that conducting this test will not degrade the safety and environmental commitments.

Based upon this evaluation of the licensing basis, the CBR SERP hereby approves the start up of the test to evaluate the removal of uranium from the commercial evaporation ponds.

Approved this 17th day of February, 2009.

 2/21/09  
Jim Stokey, General Manager and SERP Chairman

 2/17/09  
Doug Pavlick, Operations Manager

 2/17/09  
Larry Teahon, Manager of Health, Safety and Environmental Affairs  
SERP Secretary

 2/17/09  
Rhonda Grantham, Radiation Safety Officer

 2/17/2009  
Bob Tiensvold, Maintenance Superintendent

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CROW BUTTE OPERATION**

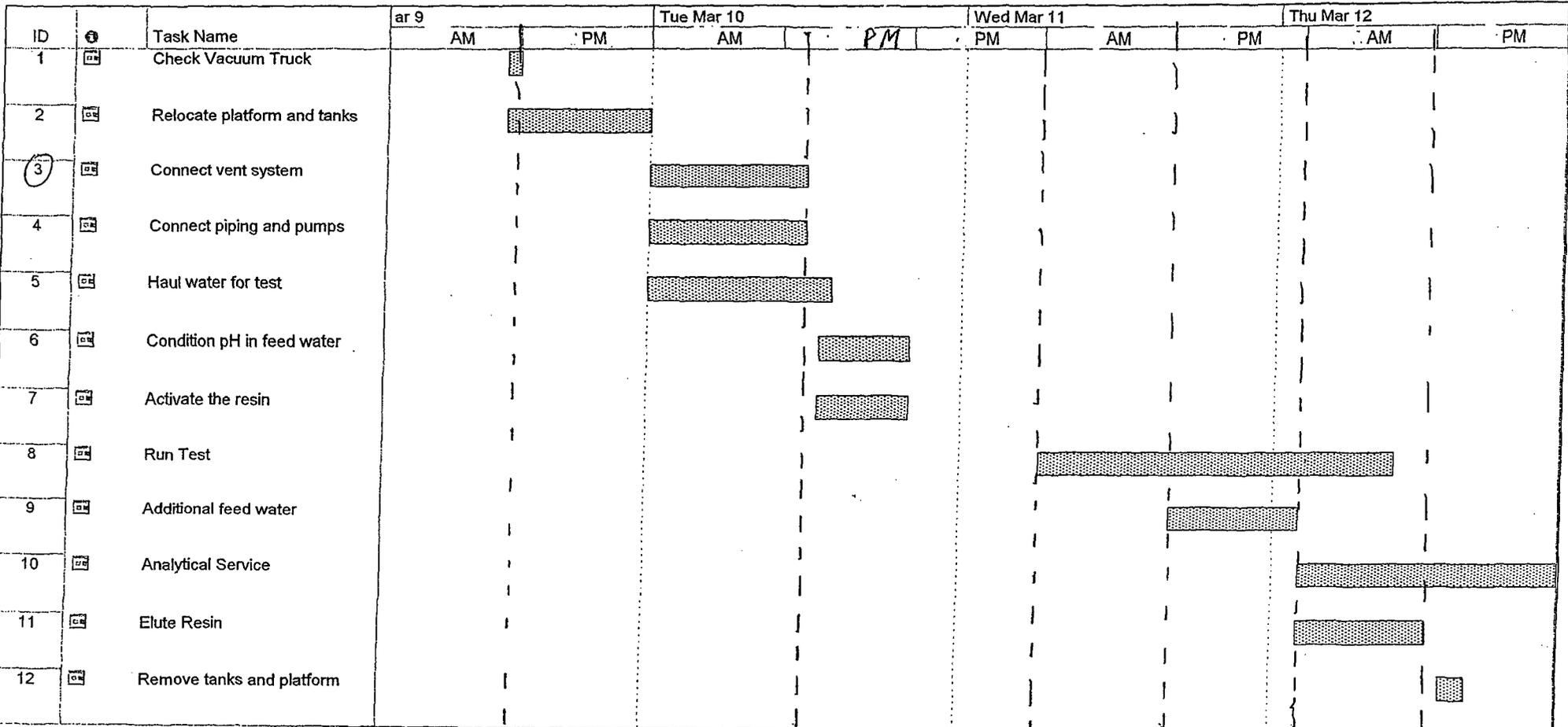


**SERP 09-01**

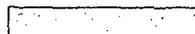
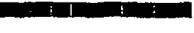
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*Steven Boeselager* 2-21-09  
Steven Boeselager, Restoration Foreman

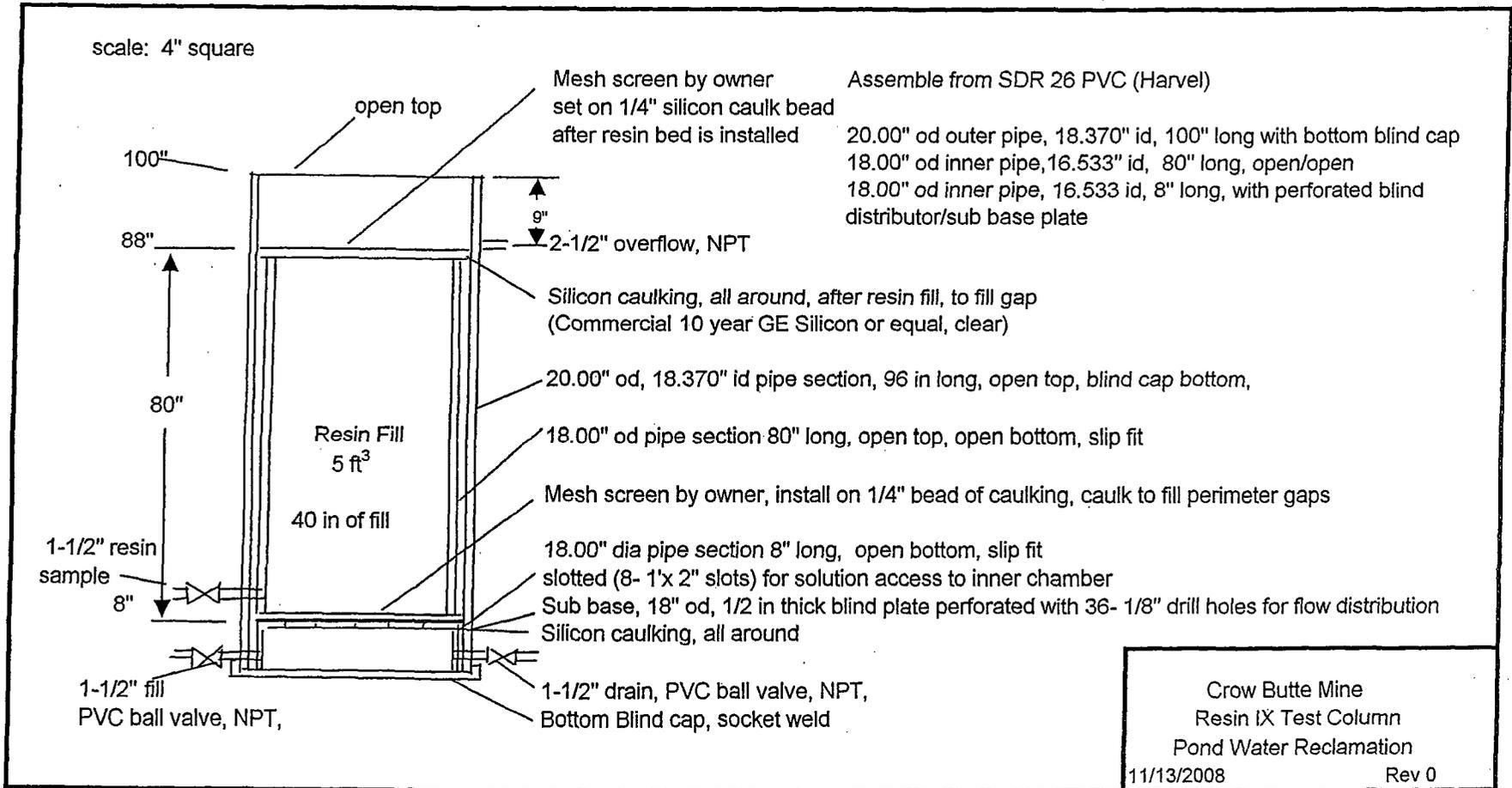
*Ron Herrick* 2-17-09  
Ron Herrick, Safety Supervisor



Project: Pilot Plant Operation2  
Date: Wed 3/4/09

Task		Milestone		External Tasks	
Split		Summary		External Milestone	
Progress		Project Summary		Deadline	

PRI CB Pond Water Resin IX vessel from piping



**PRI CB Pond Water Recovery using IDA IX Resin produced by**

**Lewatit MonoPlus TP 207 Resin**

**Pond Data for Test**

Resin Loading:	80 gpl 4.99 # U3O8 /cu ft of resin			
		Pond 1	Pond 3	Pond 4
		8,586,000	11,124,000	4,655,000
		395	297	773
Rate	5 gpm	5	5	5
Pond water		1.0	0.7	1.9
		23.7	17.8	46.4
Pond water pH adjustment with HCl		4.5	4.5	4.5
Resin loading	24 hrs	4.99	4.99	4.99
Uranium (U3O8) in pond solution	5 cuft	28285	27554	30010
Elution: Use one batch of 10 ft3 (2-BV) of 7% HCl solution		95	71	186
Plant Cost	1.19 \$ / gallon			
Uranium recovered in 24 hour run,		23.5		
Research Center report of 99% rec.				

**Test Procedure:**

- 1 Set up pilot plant equipment in the RO building, and charge the IX vessel with the test resin. Check equipment for readiness.
- 2 Collect and transport pond water from pond no.1 to the 8000 gal feed tank in the RO building to have a full day's supply of water
- 3 Plan staffing of operations to run the test for 24 hours, maintaining continuous operation.
- 4 Plan sampling to take samples at hours 0, 6, 12, 16, 18, 20, 21, 22, 23, and 24. See Sampling plan below.
- 5 Adjust pH of feed to 4.5 using HCl. Circulate mix with a pump to blend.
- 6 Start test run and control flow rate and pH at the prescribed gpm (per the flow meter output)
- 7 Complete 24 hour test run. After completion drain and rinse the IX vessel, returning all pond waters and rinse waters back into the pond. Complete the sampling collection.
- 8 Start Elution Run. Make up barren eluant with HCl to a 7% eluate solution. Measure pH.
- 9 Transfer barren eluant into the IX resin vessel, using 2BV relative to resin charge.
- 10 Allow the resin to contact the eluant for 60 minutes. Drain the eluant into the following eluate holding tank.
- 11 Collect the samples of solution and resin according to the Flowsheet
- 12 2nd stage elution: Complete the elution with a 2nd elution cycle. Repeat 7,8,9, & 10 above.
- 13 Recover the pregnant eluate by transporting to the MPP the eluant collected from the 1st and 2nd elution cycles
- 14 Discharge the test eluant solutions into the MPP Pregnant eluate tank, recovering the captured U3O8.

**HCl 7% solution Make-up**

- 1 Objective: Make-up 10 ft3 (2 BV) of 7% HCl solution to eluate 5 ft3 of TP-207 resin, loaded with U
- 2 Strong HCl: Calculate this mix presuming that the plant will obtain 35% commercial HCl: 35% HCl sg = 1.18
- 3 7% HCl sg = 1.035 sg
- 4 HCl for elution: Calculate: 10 ft3 = 74.8 gallons of 7% acid solution = 74.8 gal. x 8.34 # / g x 1.035 sg = 646 lb total and contains 45 lb HCl
- 5 HCl 45 lb in 35% solution at 1.18 sg: 45 lb / .35% = 128 lb HCl solution. 128 lb sol. / (8.34 x 1.18) = 13.0 gallons of 35% solution
- 6 Quantity Required: 1-55 gal drum of 35% acid will provide for 4+ batches of 13.0 gallons each. 1st elution 13.0 gal., 2nd elution 13.0 gal.

**Mix 7% HCL solution using 35% HCl stock**

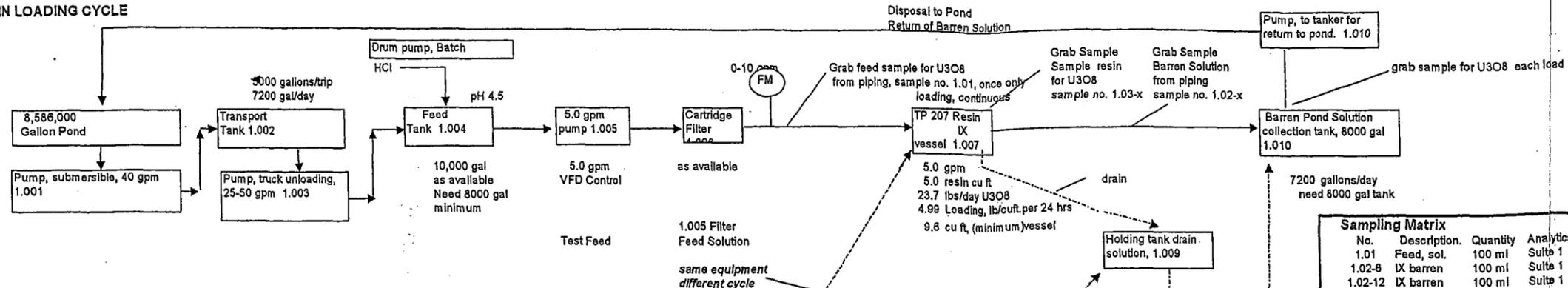
- 8 Add water to 100 gal tank : Use 74.8 -13.0 = 61.8 gallons of water. Add the 61.8 gallons using predetermined visual level line on tank
- 7 Use chemical safety clothing , breathing, and eye protection gear.
- 8 Start mixer. Slowly add 13.0 gallons of 35% HCl to agitated water. Agitate for 1 minute after completion of addition.
- 9 Combined volume will be approximately 74.8 gallons, good for one elution of 2 BV batch to strip 5 cu ft of resin. Complete elution cycle.
- 9 Repeat elution with 2nd batch.
- 10 Clean area and containers..

**Resin Preparation Procedure**

- 1 The TP 207 resin as received is in the +Na state.
  - 2 IX loading of U from pond water requires the resin be converted to the +H state
  - 3 The equipment described by the flowsheet below can be used for the resin conversion.
- Conversion steps**
- 4 Manually load the resin into the selected IX vessel, on top of a 50% full water cushion.  
Drain water from vessel
  - 5 Prepare a 7% HCl acid solution in the 100 gallon PP tank using procedure described previously
  - 6 Pump the 7% HCl solution into the bottom of the IX vessel, filling the vessel with 2 BV.
  - 7 Allow 45 minutes for the conversion to take place.
- The 7% acid solution will react with the resin +Na form to convert to resin +H form, and release NaCl to the aqueous solution  
After 45 minutes the conversion is complete and the resin is in the H+ form , ready to capture Uranium.  
After 45 minutes the conversion is complete and the resin is in the H+ form , ready to capture Uranium.
- 8 Drain the IX column to an available tank, discard the spent solution to the pond transport equipment

**FLWSHEET OF RESIN TEST PILOT PROGRAM**

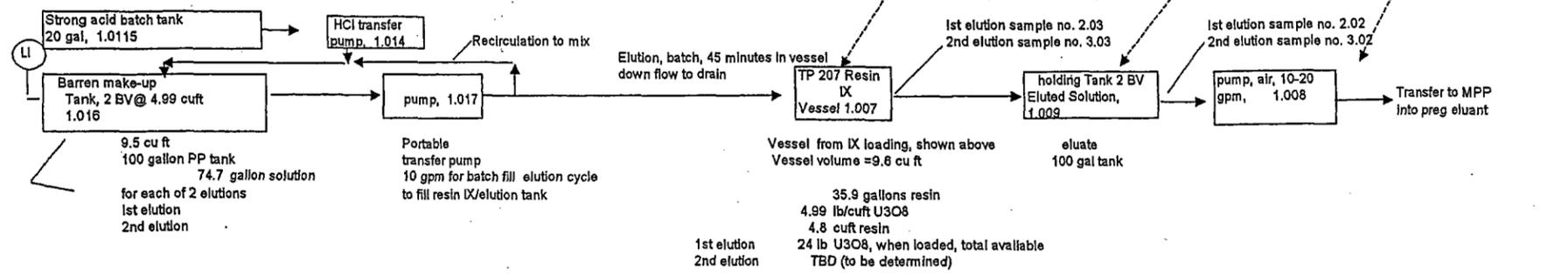
**RESIN LOADING CYCLE**



**ELUTION CYCLE**

- Purpose: 1 Extract U3O8 from IX resin and transfer the recovered Uranium to MPP Eluate for subsequent precipitation with production  
 2 Repeat elution cycle with barren mix to reduce IX resin U3O8 content.  
 3 Leave the resin in the +H state for recycle to IX duty

Run 2 elution cycles to strip resin to a low level, TBD (to be determined)  
 Each run shown below  
 HCl, to make up 7% sol  
 5 gallons, 100% acid



No.	Description	Quantity	Analytical
1.01	Feed, sol.	100 ml	Suite 1
1.02-6	IX barren	100 ml	Suite 1
1.02-12	IX barren	100 ml	Suite 1
1.02-18	IX barren	100 ml	Suite 1
1.02-20	IX barren	100 ml	Suite 1
1.02-22	IX barren	100 ml	Suite 1
1.02-23	IX barren	100 ml	Suite 1
1.02-24	IX barren	100 ml	Suite 1
1.03-6	Resin load	100 cc	Suite 2
1.03-12	Resin load	100 cc	Suite 2
1.03-18	Resin load	100 cc	Suite 2
1.03-20	Resin load	100 cc	Suite 2
1.03-22	Resin load	100 cc	Suite 2
1.03-23	Resin load	100 cc	Suite 2
1.03-24	Resin load	100 cc	Suite 2
4.01-1	ix barren pond	100cc	Suite 1

**Analytical**  
 Suite 1 U3O8, Vanadium, Chloride in solution, ppm,  
 Suite 2 U3O8, on resin, grams/cu ft  
 pH pH, solution, standard units

**CROW BUTTE POND WATER RECLAMATION  
 PILOT TEST PROGRAM  
 PROCESS FLOW SHEET**

DLB REV 0 #####

**Equipment List**

(Available from CB Inventory?)

CB has following equipment available.  
 Vac truck, 3000 gal capacity  
 2 FRP columns, 10 ft hi x 4 ft dia  
 1 steel column, 5 ft hi x 3 ft dia  
 2 Brown FRP tanks 8 ft hi x 7'9" dia  
 1-1/2" piping  
 1-1/2" flow meter  
 VFD and 5 gpm pump  
 Rosedale filters. Will order 20 micron bags  
 HCl acid from plant storage tank

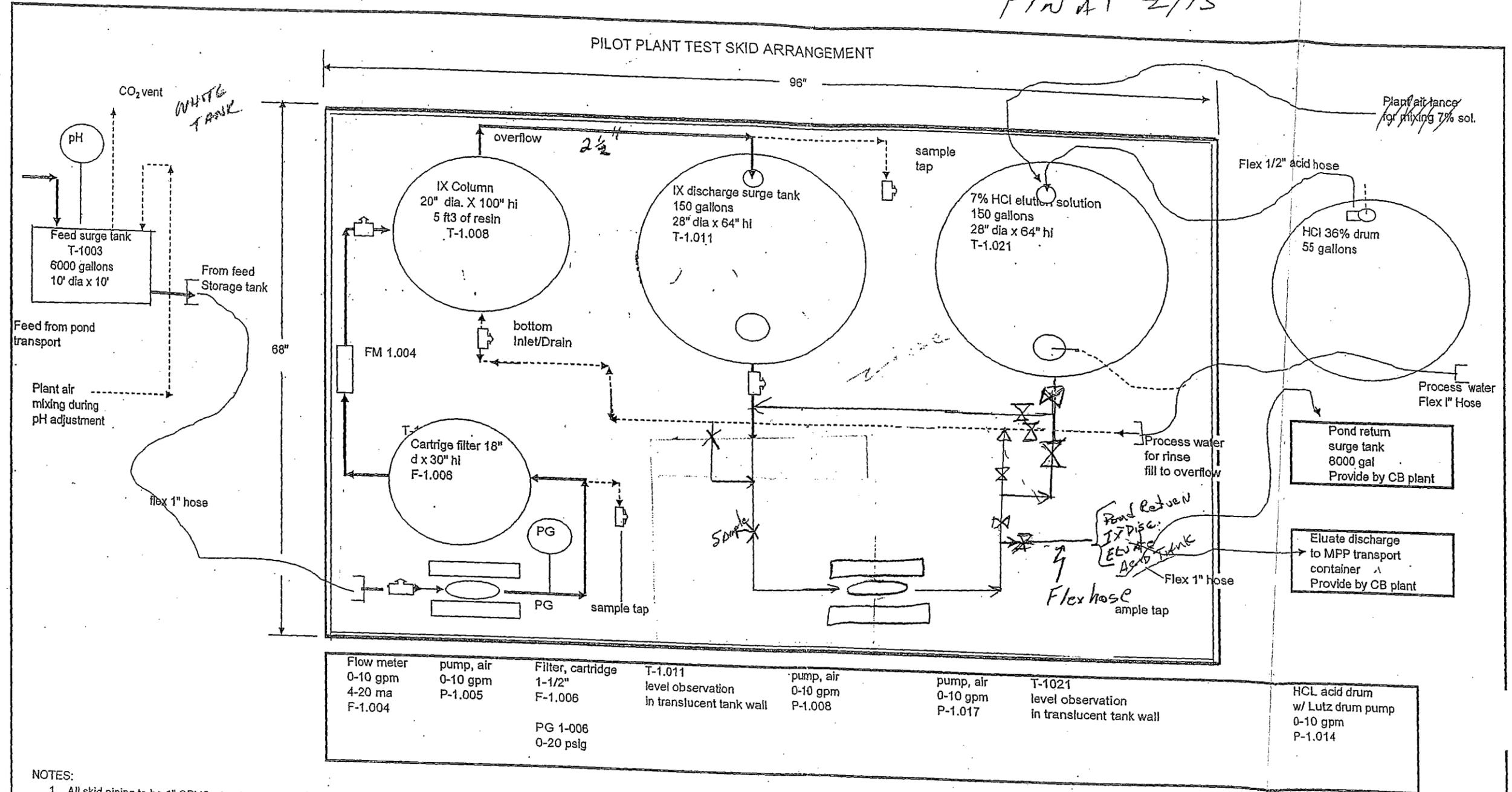
1.001	Pond water pump, submersible, 40 gpm, plastic construction, US Plastic # 102003 Large volume Chemical & Submersible Pump	Available on hand		
1.002	Transport, truck pond water to RO Building, 1500gal Standard 5 ton flatbed truck with 1500 gal water tank, Purchase Polyethylene tank from Plasti C-Mart 130" x 81" x 44", No. 41392	Available on hand		
1.003	Pump, truck unloading adjustable output, double diaphragm, 25 gpm sand piper type discharging from truck tank to existing 10' x 10' feed tank			
1.004	Tank, feed to test program, Use existing 10 x 10 FRP tank in RO building as feed tank, approx 8000 gallons capacity	Available on hand		
1.014	Pump, drum, 10 gpm, strong HCL pH adjustment US Plastic Lutz chemical pump 115 V 640 watt to HCl batch tank	cost 900 add on 100 shipping 200		
1.005	Pump, feed, adjustable output, double diaphragm sand piper type discharging from feed tank to test circuit IX at 5.0 gpm	cost 900 add on 100 Shipping 300		
Inst	Flow meter, 2 to 14gpm range, 5.0 gpm set point, 4-20 ma output, used to set test throughput	Available on hand		
Inst	pH meter, in line 4-20 ma output	Available on hand		
1.006	Filter, Cartridge, 12 sq ft cap, 50 micron, 15 gpm Filters rating, PVC	Available on hand		
1.007	Vessel, IX, Adapt Modification Piping adaption Contain 5 cu ft resin Design to be advised (upflow/downflow) Resin 5 cu ft TP-207 buy 7 cu ft 1-container	surplus 2000 add-on 2000 cost 1845 shipping 300		

1.009	Tank, IX drain, pp, 100 gal Plasti C-Mart 100 gal. vert. Poly Storage 1. VT0100-28 28" dia x 45" high	cost 300 add on 200 Shipping 100		
1.008	Pump, barren solution IX drain elution transfer 20-40 gpm	available		
1.01	Tank, day discharge, to pond, find plant surplus 8000 gal or multiple of 1500 gal truck tank capacity to return to pond	cost available add on 1000		
1.011	Pump, barren solution IX transfer to transport tank, 20-40 gpm			
1.014	Pump, drum, 10 gpm, strong HCL transfer. Also used as drum US Plastic Lutz chemical pump 115 V 640 watt to HCl batch tank	pump for pH adjustment		
1.015	Tank, HCl batch volume feed, pp, 20 gal Plasti C-Mart 20 gal. vert. Poly Storage VT0100-28 28" dia x 45" high	cost 200 add on 100 shipping 100		
1.016	Tank, Barren eluate Make-up of HCl 7% , Plasti C-Mart 100 gal. vert. Poly Storage 1. VT0100-28 28" dia x 45" high	cost 300 add on 200 Shipping 100		
1.017	Pump, batch transfer of 7% acid to IX / Elution vessel	cost 900 add on 100 Shipping 300		

CROW BUTTE POND WATER RECLAMATION  
 PILOT TEST PROGRAM

DLB REV 0 #####

Final 2/13



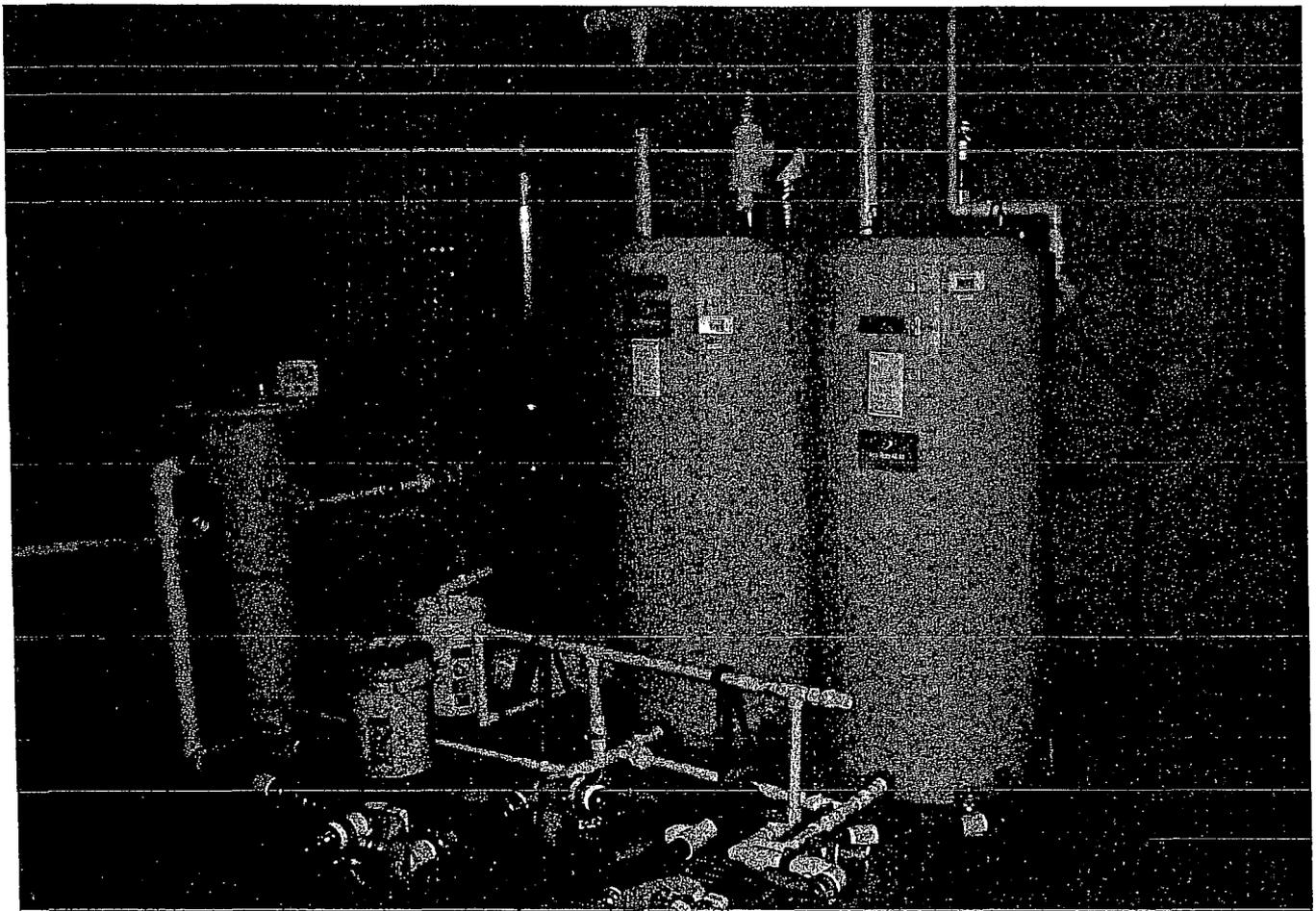
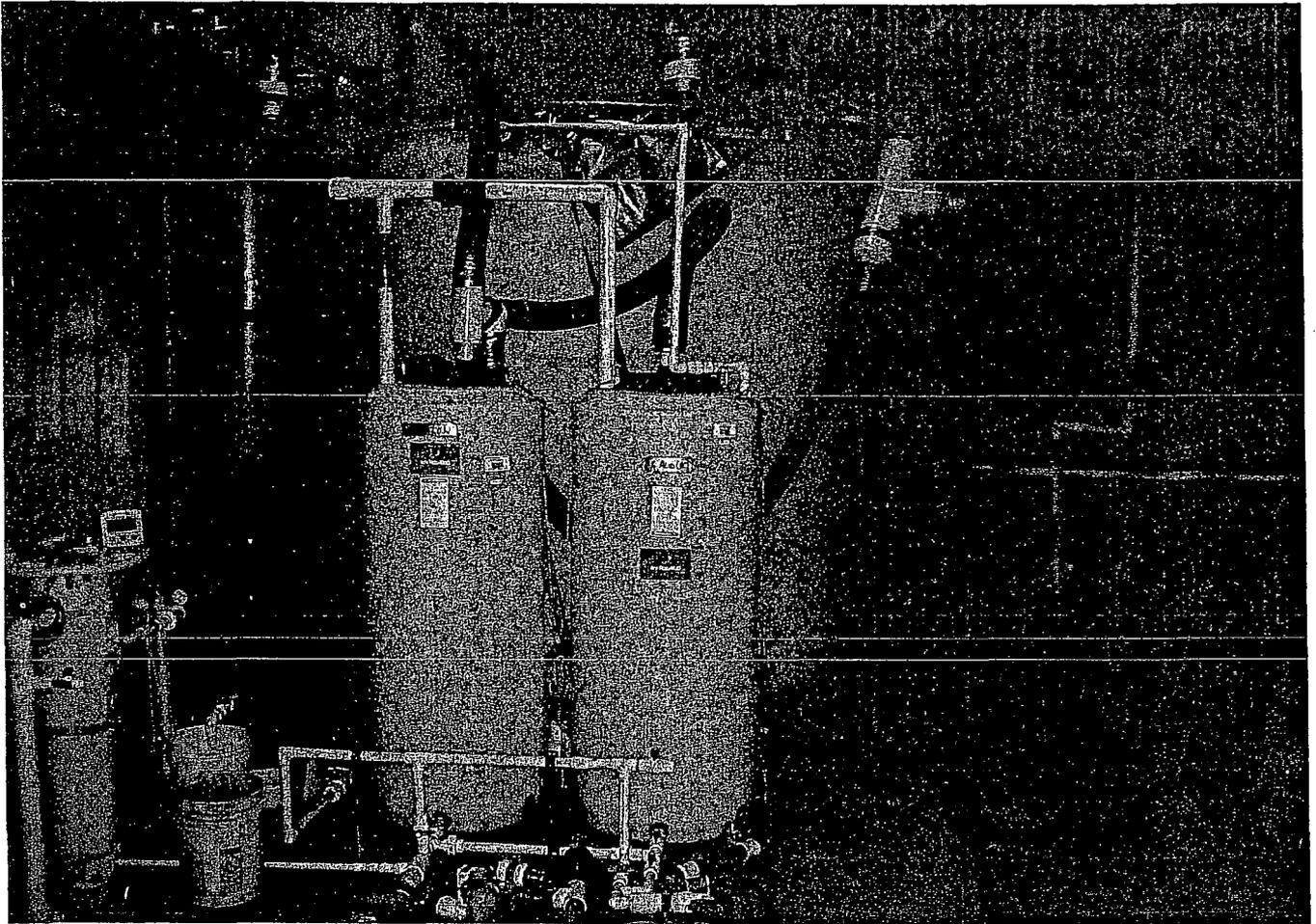
Flow meter 0-10 gpm 4-20 ma F-1.004	pump, air 0-10 gpm P-1.005	Filter, cartridge 1-1/2" F-1.006  PG 1-006 0-20 psig	T-1.011 level observation in translucent tank wall	pump, air 0-10 gpm P-1.008	pump, air 0-10 gpm P-1.017	T-1.021 level observation in translucent tank wall	HCL acid drum w/ Lutz drum pump 0-10 gpm P-1.014
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NOTES:

- All skid piping to be 1" CPVC plastic pipe, socket weld and NPT connections provide pipe supports between each vessel/pump, with additional supports no less than every 2 ft.
- Flex Hose connections to be class 125 camlock or equal
- Each vessel on skid to be firmly supported for possibility of road transport
- Pumps to be firmly mounted to base plates
- Process valves to be 1" socket weld CPVC ball valves with neoprene elastomer of equal
- Air pump inlet/outlet connections are 1/2" FNPT
- Sample tap valves to be 1/2" socket weld CPVC
- Air pumps: Provide 1/4" NPT supply to ea pump, 3/8" NPT exhaust
- Air header piping: Use 1/2" NPT header, 1/4" NPT laterals, galvanized steel pipe, valves, and fittings. Connect to plant air with a Flex air hose and QD connectors

POND SOLUTION IX TREATMENT  
PILOT PLANT TEST SKID ARRANGEMENT  
CROW BUTTE - CAMECO

DRAWING G-1.001 Rev A 12/04/2008





## Health, Safety, and Radiation Risk Assessment Checklist

Exposure to cold weather (surface)	<input type="checkbox"/>	Inhalation of process chemical fumes (barium chloride, ferric, lime, welding etc)	<input type="checkbox"/>	Struck by light/heavy equipment	<input type="checkbox"/>
Exposure to brine (freeze system)	<input type="checkbox"/>	Ingestion of process chemicals (barium chloride, ferric, lime etc)	<input type="checkbox"/>	Struck by remote equipment	<input type="checkbox"/>
Exposure to compressed gas (oxygen, nitrogen, acetylene)	<input type="checkbox"/>	Contact with process chemicals (barium chloride, ferric, lime etc)	<input type="checkbox"/>	Struck by runaway equipment	<input type="checkbox"/>
Falling through ice	<input type="checkbox"/>	Injection of illicit drugs	<input type="checkbox"/>	Thrown from moving equipment	<input type="checkbox"/>
Exposure to cold (underground)	<input type="checkbox"/>	Inhalation of diesel/gas fumes	<input type="checkbox"/>	Struck by suspended load	<input type="checkbox"/>
Sun exposure	<input type="checkbox"/>	Inhalation of blasting fumes	<input type="checkbox"/>	Rollover of equipment	<input type="checkbox"/>
Forest Fires - exposure to heat	<input type="checkbox"/>	Inhalation of cigarette smoke	<input type="checkbox"/>	Pinch between equipment	<input type="checkbox"/>
Exposure to refrigerants (a/c)	<input type="checkbox"/>	Inhalation of fire generated smoke	<input type="checkbox"/>	Loss of control pulling and moving equipment that is out of service	<input type="checkbox"/>
Contact with hot metal (welding, op. equip., pipe, etc)	<input type="checkbox"/>	Injection of high pressure fluids	<input type="checkbox"/>	Collision while operating equipment	<input type="checkbox"/>
Exposure to fire (burning building, scoops)	<input type="checkbox"/>	Ingestion of contaminated potable water	<input type="checkbox"/>		
Contact with open flame (welding torch, propane burners)	<input type="checkbox"/>	Inhalation of dust (silica, chemicals, cement, fly ash) maintenance activities	<input type="checkbox"/>	Caught in rotating equipment (high speed fans, motors, pumps)	<input type="checkbox"/>
Contact with steam (batch plant)	<input type="checkbox"/>	Oxygen deficiency	<input type="checkbox"/>	Caught in conveyor roller/belt, auger	<input type="checkbox"/>
Contact with hot steam, burners, hot water, (Kitchen, pressure washers)	<input type="checkbox"/>	Explosion due to flammable gas, chemical reaction	<input type="checkbox"/>	Falling into crusher	<input type="checkbox"/>
Contact with hot fluid (hydraulics, coolant)	<input type="checkbox"/>	Accidental/Intentional poisoning, chemical mixing, cleaning supplies, Hazardous products.	<input checked="" type="checkbox"/>	Caught in rotating equipment (low speed drills)	<input type="checkbox"/>
		Accidental detonation of explosives	<input type="checkbox"/>		
Contact with sewage (RBC Plant, process)	<input type="checkbox"/>			Struck by overhead doors	<input type="checkbox"/>
Contact with medical waste	<input type="checkbox"/>	Welding Flash	<input type="checkbox"/>	Caught by ropes/cables (tuggers, crane)	<input type="checkbox"/>
Ingestion of contaminated water	<input type="checkbox"/>	Sunburn	<input type="checkbox"/>	Struck by shaft conveyance	<input type="checkbox"/>
Contact with infectious disease	<input type="checkbox"/>	Exposure to gamma source	<input type="checkbox"/>	Sudden stop/ free fall of shaft conveyance (overspeed)	<input type="checkbox"/>
Food contamination	<input type="checkbox"/>	Exposure to radon gas & progeny	<input type="checkbox"/>	Fall into tank/lake/pond	<input type="checkbox"/>
Contact with infected animals (rabies, hantavirus, west Nile)	<input type="checkbox"/>	Exposure to LLRD	<input type="checkbox"/>		
Airborne particles, forest fire smoke, asthmatic irritants	<input type="checkbox"/>			Caught in rotating equipment (high speed drills eg diamond drill)	<input type="checkbox"/>
Poor hygiene	<input type="checkbox"/>	Contact with live conductors	<input type="checkbox"/>	Caught in rotating equipment (low speed drills eg jumbo drill)	<input type="checkbox"/>
		Lightning	<input type="checkbox"/>	Injury from cutting tool (power saws, grinders, drills)	<input type="checkbox"/>
Excessive noise from tools	<input type="checkbox"/>	Collision with electrical equipment	<input type="checkbox"/>	Injury from porta-pak operation	<input type="checkbox"/>
Blast vibration (concussion from devt round)	<input type="checkbox"/>	Static buildup causing ignition	<input type="checkbox"/>	Injury from hand tools (axe, hammer, wrench slippage)	<input type="checkbox"/>
Vibration from hand tools	<input type="checkbox"/>	Shock from welder	<input type="checkbox"/>	Contact with high pressure water (pressure washer)	<input type="checkbox"/>
Vibration from equipment	<input type="checkbox"/>	Release of air/water/concrete/oil/sand from lines	<input type="checkbox"/>	Injury from sheet metal (fabrication, installation)	<input type="checkbox"/>
Excessive noise from equipment	<input type="checkbox"/>	Injection of high pressure air	<input type="checkbox"/>	Injury from firearms	<input type="checkbox"/>
		Release of high pressure ground water	<input type="checkbox"/>	Pinned/pinched by jackleg	<input type="checkbox"/>
Attack from animal (bear, wolf)	<input type="checkbox"/>	Rupture of pressure vessels, boilers, cylinders	<input type="checkbox"/>		
Vehicle collision (moose etc)	<input type="checkbox"/>	Rupture of tires/split rims	<input type="checkbox"/>	Ice falling from buildings	<input type="checkbox"/>
Plane collision with birds, animals	<input type="checkbox"/>	Uncontrolled movement of lines under pressure	<input type="checkbox"/>	Rockfall (loose)	<input type="checkbox"/>
Allergic reaction to bites/stings	<input type="checkbox"/>	Cleaning/Figging lines	<input type="checkbox"/>	Equipment falling from jack/blocks/hoist	<input type="checkbox"/>
		Crush by hydraulic equipment pivot point	<input type="checkbox"/>	Grinding discs disintegrating	<input type="checkbox"/>
		Rockburst	<input type="checkbox"/>	Objects falling in shaft	<input type="checkbox"/>
		Pinch by hydraulic press	<input type="checkbox"/>	Release of concrete from slickline	<input type="checkbox"/>
		Vacuum Pressure, atmospheric pressure, Suck Truck	<input checked="" type="checkbox"/>	Flyrock, airblast from blasting (unexpected b/through)	<input type="checkbox"/>
		Uncontrolled movement of equipment (vent doors)	<input type="checkbox"/>	Extraneous material from grinding	<input type="checkbox"/>
				Failure of suspended load	<input type="checkbox"/>
Sitting at computer for long periods	<input type="checkbox"/>			Hot slag from welding/cutting	<input type="checkbox"/>
Operating mobile equipment	<input type="checkbox"/>			Dropping of objects (tools, supplies)	<input type="checkbox"/>
Operating remote equipment	<input type="checkbox"/>			Run of muck in raise/pass (sloughing)	<input type="checkbox"/>
Welding on equipment in cramped positions	<input type="checkbox"/>			Backfill plug failure	<input type="checkbox"/>
Working on equipment in tight confines	<input type="checkbox"/>			Inrush of water	<input type="checkbox"/>
Installing ground support, sealing	<input type="checkbox"/>			Dropping of objects (equipment, materials)	<input type="checkbox"/>
				Collapse of stockpile face	<input type="checkbox"/>
Lifting chuck wrench on raise drill, moving pumps	<input type="checkbox"/>	Slips due to icy conditions	<input type="checkbox"/>	Cave-in of trench	<input type="checkbox"/>
Moving materials/supplies	<input type="checkbox"/>	Falling while working in scoop bucket	<input type="checkbox"/>	Failure of dam wall/bern	<input type="checkbox"/>
Changing d/drill rods, core trays	<input type="checkbox"/>	Fall while working in elevating platform, scaffolding	<input type="checkbox"/>	Structural failure of infrastructure (building, bridge, crane)	<input type="checkbox"/>
Shovelling concrete/snow	<input type="checkbox"/>	Fall from ladder, stairs, platforms, tanktops	<input type="checkbox"/>	Moving materials and loads with mobile equipment	<input checked="" type="checkbox"/>
Dragging hydraulic hoses/jumbo cable	<input type="checkbox"/>	Falling into open hole (vent raise, shaft)	<input type="checkbox"/>	Material sliding off truck tray	<input type="checkbox"/>
Installing electrical cable	<input type="checkbox"/>	Slips due to wet surfaces	<input type="checkbox"/>		
Manual handling of materials in shop. (Door size, Manual handling of tools)	<input type="checkbox"/>	Slips due to uneven, rough surface (muckpile)	<input type="checkbox"/>		
		Tripping due to poor housekeeping	<input type="checkbox"/>		
		Dismounting equipment	<input type="checkbox"/>		

## Environmental Aspects Risk Assessment Checklist

Attracting animals from domestic wastes (food)	<input type="checkbox"/>
Disturbing land from construction of roads or trails	<input type="checkbox"/>
Disturbing land from off-road activities	<input type="checkbox"/>
Disturbing animals from noise generation	<input type="checkbox"/>
Contaminated materials being stored outside contained areas.	<input type="checkbox"/>
Damaging a containment liner (asphalt, waste pad & pond liners, concrete floor)	<input type="checkbox"/>
Contaminated waters in a pad or pond, escaping containment	<input checked="" type="checkbox"/>
Generating runoff and erosion	<input type="checkbox"/>
Water will need to be used	<input checked="" type="checkbox"/>
Propane, diesel, gasoline being used	<input type="checkbox"/>
Local resources (sand, gravel, land) will be used	<input type="checkbox"/>
New or existing chemicals will be used	<input checked="" type="checkbox"/>

Discharging effluent with a limit	<input type="checkbox"/>
Changing the quality of water reporting for treatment	<input checked="" type="checkbox"/>
Increasing contaminant loading to the environment	<input type="checkbox"/>
Impacting the performance of treatment facilities	<input type="checkbox"/>
Release of a refrigerant (freon, halocarbons, etc.) to the air	<input type="checkbox"/>
Generating greenhouse gases (combustion products)	<input type="checkbox"/>
Generating noxious or nuisance odours / vapours	<input checked="" type="checkbox"/>
Generating smoke and / or dust	<input type="checkbox"/>
An uncontrolled inflow of water to the mine	<input type="checkbox"/>

<b>Fuels and Hazardous Chemicals</b>	
Release while transporting fuel from one location to another	<input type="checkbox"/>
Release while transferring fuels to a storage tank	<input type="checkbox"/>
Spill while transferring fuel to equipment	<input type="checkbox"/>
<b>Fuels and hazardous chemicals storage</b>	
Spill while transporting hazardous chemicals from one location to another	<input type="checkbox"/>
<b>Water, Effluent, Sewage, Other</b>	
Leaks from a pipeline containing sewage, effluent, or contaminated waters	<input type="checkbox"/>
Spilled or leaking material could enter a waterbody (creek, river, lake)	<input type="checkbox"/>
Generating contaminated debris or equipment (underground debris, equipment)	<input type="checkbox"/>
Generating industrial wastes (construction waste)	<input type="checkbox"/>
Generating recyclable materials (paper, cardboard, pallets, drums)	<input type="checkbox"/>
Generating hazardous materials (batteries, waste oil)	<input type="checkbox"/>
Waste rock will be generated	<input type="checkbox"/>

### Hierarchy of Hazard Controls

The "Hierarchy of hazard control" below are listed in priority order i.e., the most effective is listed first, with less effective options listed lower. The highest practical levels of risk control should be chosen. A combination of higher and lower level risk controls is usually desirable.

Elimination	Best	Eliminate or remove the task that causes the risk or hazard. <u>Question</u> - Does the task need to be done?
Substitution		Replace the hazard with something less hazardous eg., substitute a toxic substance with another that is non-toxic. <u>Question</u> - Can something else be used to reduce the risk?
Engineering Controls		Use mechanical devices or equipment to reduce the risk. eg. Local exhaust ventilation, isolation, guarding, lighting, rearrange the work area, provide containment, etc. <u>Question</u> - Can we install something to reduce the risk?
Administrative Controls		Use of practices, work instructions or training to reduce the risk eg. Work permits, checklists, procedures, training. <u>Question</u> - Are we using our Cameco procedures and instruction to reduce the risk?
Personal Protective Equipment		Use of Personal Protective Equipment to reduce the risk and making sure workers are familiar with and trained to properly use the equipment eg. Gloves, faceshield, hearing protection, chemical suits <u>Question</u> - What PPE should be used to reduce the risks of this job task?
	Least Preferred	



# JOB HAZARD ANALYSIS

## Step 1: JOB INFORMATION

Job to be Analyzed: TREATMENT OF POND WATER TO REMOVE URANIUM AND VANADIUM

Facilitator: DENNIS KERSTENS

Department Responsible: PLANT

Date of JHA: 3-4-09

Was a Previous JHA Done for this Job?  Yes  No

If Yes: Date of Previous JHA: 2-19-09

Step 2: BASIC JOB STEPS	Step 3: HAZARDS/RISKS	Step 4: CONTROLS
CHECK VACUUM TRUCK	FALLS - DRIVING POSSIBLE CONTAMINATION	TRAINING LICENSE WASH (IF NECESSARY) CERTIFIED DRIVER
RELOCATE PLATFORM AND TANKS.	USING FORKLEIFT	TRAINING ON FORKLEIFT
CONNECT VENT SYSTEM	USING LADDERS/FALL	LADDER TRAINING
CONNECT PIPING AND PUMPS	LADDER USE	
HAUL WATER FOR TEST.	WORKING AROUND POND LEVELS HOSE PRESSURE DREVENG	POND/LEVEL TRAINING CONTROLLING HOSE WATER TRUCK LICENSE / CERTIFIED
CONNECTION PIT IN FEED WATER.	HYDROCHLORIC ACID / VALVES NOT SET CORRECTLY	CHEMICAL SAFE GOGGLES RAINSUIT, RUBBER BOOTS, CHEMICAL SAFE GLOVES. EXPERIENCED OPERATORS. WELL SET VALVES
RUN TEST	VALVES NOT SET CORRECTLY. HIGH RADONS	EXPERIENCED OPERATOR WELL CONTROL FLOW. FANS USED TO VENT
IF LUTE RESIN	7% HYDROCHLORIC ACID RADON BUILDUP	PROPER PPE FANS TO VENT OUTSIDE
REMOVE SYSTEM TO RESTRICTED AREA	USING FORKLEIFT	CERTIFIED FORKLEIFT DRIVER

## Health, Safety, and Radiation Risk Assessment Checklist

Exposure to cold weather (surface)	<input type="checkbox"/>	Inhalation of process chemical fumes (barium chloride, ferric, lime, welding etc) <i>ALFD</i>	<input checked="" type="checkbox"/>	Struck by light/heavy equipment	<input type="checkbox"/>
Exposure to brine (freeze system)	<input type="checkbox"/>	Ingestion of process chemicals (barium chloride, ferric, lime etc)	<input type="checkbox"/>	Struck by remote equipment	<input type="checkbox"/>
Exposure to compressed gas (oxygen, nitrogen, acetylene)	<input type="checkbox"/>	Contact with process chemicals (barium chloride, ferric, lime etc)	<input checked="" type="checkbox"/>	Struck by runaway equipment	<input type="checkbox"/>
Falling through ice	<input type="checkbox"/>	Injection, inhalation of illicit drugs	<input type="checkbox"/>	Thrown from moving equipment	<input type="checkbox"/>
Exposure to cold (underground)	<input type="checkbox"/>	Inhalation of diesel/gas fumes	<input type="checkbox"/>	Struck by suspended load	<input type="checkbox"/>
Sun exposure	<input type="checkbox"/>	Inhalation of blasting fumes	<input type="checkbox"/>	Rollover of equipment	<input type="checkbox"/>
Forest Fires - exposure to heat	<input type="checkbox"/>	Inhalation of cigarette smoke	<input type="checkbox"/>	Pinch between equipment	<input type="checkbox"/>
Exposure to refrigerants (a/c)	<input type="checkbox"/>	Inhalation of fire generated smoke	<input type="checkbox"/>	Loss of control pulling and moving equipment that is out of service	<input type="checkbox"/>
Contact with hot metal (welding, op. equip., pipe, etc)	<input type="checkbox"/>	Injection of high pressure fluids	<input type="checkbox"/>	Collision while operating equipment	<input type="checkbox"/>
Exposure to fire (burning building, scoops)	<input type="checkbox"/>	Ingestion of contaminated potable water	<input type="checkbox"/>	Caught in rotating equipment (high speed fans, motors, pumps)	<input type="checkbox"/>
Contact with open flame (welding torch, propane burners)	<input type="checkbox"/>	Inhalation of dust (silica, chemicals, cement, fly ash) maintenance activities	<input type="checkbox"/>	Caught in conveyor/roller/belt, auger	<input type="checkbox"/>
Contact with steam (batch plant)	<input type="checkbox"/>	Oxygen deficiency	<input type="checkbox"/>	Falling into crusher	<input type="checkbox"/>
Contact with hot steam, burners, hot water, (Kitchen, pressure washers)	<input type="checkbox"/>	Explosion due to flammable gas, chemical reaction	<input type="checkbox"/>	Caught in rotating equipment (low speed drills)	<input type="checkbox"/>
Contact with hot fluid (hydraulics, coolant)	<input type="checkbox"/>	Accidental/Intentional poisoning, chemical mixing, cleaning supplies, Hazardous products	<input type="checkbox"/>	Struck by overhead doors	<input type="checkbox"/>
Contact with sewage (RBC Plant, process)	<input type="checkbox"/>	Accidental detonation of explosives	<input type="checkbox"/>	Caught by ropes/cables (tuggers, crane)	<input type="checkbox"/>
Contact with medical waste	<input type="checkbox"/>	Welding Flash	<input type="checkbox"/>	Struck by shaft conveyance	<input type="checkbox"/>
Ingestion of contaminated water	<input checked="" type="checkbox"/>	Sunburn	<input type="checkbox"/>	Sudden stop/ free fall of shaft conveyance (overspeed)	<input type="checkbox"/>
Contact with infectious disease	<input type="checkbox"/>	Exposure to gamma source	<input type="checkbox"/>	Fall into tank/lake/pond	<input type="checkbox"/>
Food contamination	<input type="checkbox"/>	Exposure to radon gas & progeny	<input checked="" type="checkbox"/>	Caught in rotating equipment (high speed drills eg diamond drill)	<input type="checkbox"/>
Contact with infected animals (rabies, hantavirus, west Nile)	<input type="checkbox"/>	Exposure to LLRD	<input type="checkbox"/>	Caught in rotating equipment (low speed drills eg jumbo drill)	<input type="checkbox"/>
Airborne particles, forest fire smoke, asthmatic irritants	<input type="checkbox"/>	Contact with live conductors	<input type="checkbox"/>	Injury from cutting tool (power saws, grinders, drills)	<input type="checkbox"/>
Poor hygiene	<input type="checkbox"/>	Lightning	<input type="checkbox"/>	Injury from pota-pak operation	<input type="checkbox"/>
Excessive noise from tools	<input type="checkbox"/>	Collision with electrical equipment	<input type="checkbox"/>	Injury from hand tools (axe, hammer, wrench slippage)	<input type="checkbox"/>
Blast vibration (concussion from devt round)	<input type="checkbox"/>	Static buildup causing ignition	<input type="checkbox"/>	Contact with high pressure water (pressure washer)	<input type="checkbox"/>
Vibration from hand tools	<input type="checkbox"/>	Shock from welder	<input type="checkbox"/>	Injury from sheet metal (fabrication, installation)	<input type="checkbox"/>
Vibration from equipment	<input type="checkbox"/>	Release of air/water/concrete/oil/sand from lines	<input checked="" type="checkbox"/>	Injury from firearms	<input type="checkbox"/>
Excessive noise from equipment	<input type="checkbox"/>	Injection of high pressure air	<input type="checkbox"/>	Pinned/pinched by jackleg	<input type="checkbox"/>
Attack from animal (bear, wolf)	<input type="checkbox"/>	Release of high pressure ground water	<input type="checkbox"/>	Ice falling from buildings	<input type="checkbox"/>
Vehicle collision (moose etc)	<input type="checkbox"/>	Rupture of pressure vessels, boilers, cylinders	<input type="checkbox"/>	Rockfall (loose)	<input type="checkbox"/>
Plane collision with birds, animals	<input type="checkbox"/>	Rupture of tires/split rims	<input type="checkbox"/>	Equipment falling from jack/blocks/hoist	<input type="checkbox"/>
Allergic reaction to bites/stings	<input type="checkbox"/>	Uncontrolled movement of lines under pressure	<input type="checkbox"/>	Grinding discs disintegrating	<input type="checkbox"/>
Sitting at computer for long periods	<input type="checkbox"/>	Cleaning/Pigging lines	<input type="checkbox"/>	Objects falling in shaft	<input type="checkbox"/>
Operating mobile equipment	<input checked="" type="checkbox"/>	Crush by hydraulic equipment pivot point	<input type="checkbox"/>	Release of concrete from slickline	<input type="checkbox"/>
Operating remote equipment	<input type="checkbox"/>	Rockburst	<input type="checkbox"/>	Flyrock, airblast from blasting (unexpected b/through)	<input type="checkbox"/>
Welding on equipment in cramped positions	<input type="checkbox"/>	Pinch by hydraulic press	<input type="checkbox"/>	Extraneous material from grinding	<input type="checkbox"/>
Working on equipment in tight confines	<input type="checkbox"/>	Vacuum Pressure, atmospheric pressure, Suck Truck	<input checked="" type="checkbox"/>	Failure of suspended load	<input type="checkbox"/>
Installing ground support, scaling	<input type="checkbox"/>	Uncontrolled movement of equipment (vent doors)	<input type="checkbox"/>	Hot slag from welding/cutting	<input type="checkbox"/>
Lifting chuck wrench on raise drill, moving pumps	<input type="checkbox"/>	Slips due to icy conditions	<input type="checkbox"/>	Dropping of objects (tools, supplies)	<input type="checkbox"/>
Moving materials/supplies	<input checked="" type="checkbox"/>	Falling while working in scoop bucket	<input type="checkbox"/>	Run of muck in raise/pass (sloughing)	<input type="checkbox"/>
Changing d/drill rods, core trays	<input type="checkbox"/>	Fall while working in elevating platform, scaffolding	<input type="checkbox"/>	Backfill plug failure	<input type="checkbox"/>
Shovelling concrete/snow	<input type="checkbox"/>	Fall from ladder, stairs, platforms, tanktops	<input checked="" type="checkbox"/>	Inrush of water	<input type="checkbox"/>
Dragging hydraulic hoses/jumbo cable	<input type="checkbox"/>	Falling into open hole (vent raise, shaft)	<input type="checkbox"/>	Dropping of objects (equipment, materials)	<input type="checkbox"/>
Installing electrical cable	<input type="checkbox"/>	Slips due to wet surfaces	<input checked="" type="checkbox"/>	Collapse of stockpile face	<input type="checkbox"/>
Manual handling of materials in shop. (Door size,	<input type="checkbox"/>	Slips due to uneven, rough surface (muckpile)	<input type="checkbox"/>	Cave-in of trench	<input type="checkbox"/>
		Tripping due to poor housekeeping	<input type="checkbox"/>	Failure of dam wall/bern	<input type="checkbox"/>
				Structural failure of infrastructure (building, bridge, crane)	<input type="checkbox"/>
				Moving materials and loads with mobile equipment	<input checked="" type="checkbox"/>

## Environmental Aspects Risk Assessment Checklist

Attracting animals from domestic wastes (food)	<input type="checkbox"/>
Disturbing land from construction of roads or trails	<input type="checkbox"/>
Disturbing land from off-road activities	<input type="checkbox"/>
Disturbing animals from noise generation	<input type="checkbox"/>
Contaminated materials being stored outside contained areas.	<input type="checkbox"/>
Damaging a containment liner (asphalt, waste pad & pond liners, concrete floor)	<input type="checkbox"/>
Contaminated waters in a pad or pond, escaping containment	<input checked="" type="checkbox"/>
Generating runoff and erosion	<input type="checkbox"/>
Water will need to be used	<input type="checkbox"/>
Propane, diesel, gasoline being used	<input type="checkbox"/>
Local resources (sand, gravel, land) will be used	<input type="checkbox"/>
New or existing chemicals will be used	<input type="checkbox"/>

Discharging effluent with a limit	<input type="checkbox"/>
Changing the quality of water reporting for treatment	<input type="checkbox"/>
Increasing contaminant loading to the environment	<input type="checkbox"/>
Impacting the performance of treatment facilities	<input type="checkbox"/>
Release of a refrigerant (freon, halocarbons, etc.) to the air	<input type="checkbox"/>
Generating greenhouse gases (combustion products)	<input type="checkbox"/>
Generating noxious or nuisance odours / vapours	<input checked="" type="checkbox"/>
Generating smoke and / or dust	<input type="checkbox"/>
An uncontrolled inflow of water to the mine	<input type="checkbox"/>

<b>Fuels and Hazardous Chemicals</b>	
Release while transporting fuel from one location to another	<input type="checkbox"/>
Release while transferring fuels to a storage tank	<input type="checkbox"/>
Spill while transferring fuel to equipment	<input type="checkbox"/>
Fuels and hazardous chemicals storage	<input type="checkbox"/>
Spill while transporting hazardous chemicals from one location to another	<input type="checkbox"/>
<b>Water, Effluent, Sewage, Other</b>	
Leaks from a pipeline containing sewage, effluent, or contaminated waters	<input type="checkbox"/>
Spilled or leaking material could enter a waterbody (creek, river, lake)	<input type="checkbox"/>
Generating contaminated debris or equipment (underground debris, equipment)	<input type="checkbox"/>
Generating industrial wastes (construction waste)	<input type="checkbox"/>
Generating recyclable materials (paper, cardboard, pallets, drums)	<input type="checkbox"/>
Generating hazardous materials (batteries, waste oil)	<input type="checkbox"/>
Waste rock will be generated	<input type="checkbox"/>

### Hierarchy of Hazard Controls

The "Hierarchy of hazard control" below are listed in priority order ie., the most effective is listed first, with less effective options listed lower. The highest practical levels of risk control should be chosen. A combination of higher and lower level risk controls is usually desirable.

Elimination	Best	Eliminate or remove the task that causes the risk or hazard. <u>Question</u> - Does the task need to be done?
Substitution		Replace the hazard with something less hazardous eg., substitute a toxic substance with another that is non-toxic. <u>Question</u> - Can something else be used to reduce the risk?
Engineering Controls		Use mechanical devices or equipment to reduce the risk. eg. Local exhaust ventilation, isolation, guarding, lighting, rearrange the work area, provide containment, etc. <u>Question</u> - Can we install something to reduce the risk?
Administrative Controls		Use of practices, work instructions or training to reduce the risk eg. Work permits, checklists, procedures, training. <u>Question</u> - Are we using our Cameco procedures and instruction to reduce the risk?
Personal Protective Equipment		Use of Personal Protective Equipment to reduce the risk and making sure workers are familiar with and trained to properly use the equipment eg. Gloves, faceshield, hearing protection, chemical suits <u>Question</u> - What PPE should be used to reduce the risks of this job task?
	Least Preferred	

	Yes	No
Has the risk of the job decreased with controls in place?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Are the risks being controlled properly to protect worker health, safety and radiation and protection of the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**IMPORTANT**

While the job proceeds, constant supervision and evaluation of the job and controls must take place.

If during the work the job tasks change, or the controls cannot be implemented, the Job MUST BE STOPPED; the Cameco Supervisor contacted and the JHA reassessed.

Comments (if required):

ALL CONSTRUCTION FOR THIS TEST MUST BE REMOVED.  
 NO VALVES + REPAIRS WILL BE LEFT.

JHA Team Names and Signatures

NAME (print)	SIGNATURE
BOB TIENSUOLD	<i>Bob Tiensuold</i>
WALT NELSON	<i>Walter D. Nelson</i>
DENNIS KERSTENS	<i>Dennis Kerstens</i>
STEVE BOESELAGER	<i>Steve Boeslager</i>
RON HERRECK	<i>Ron Herrick</i>
LARRY TEAHON	<i>Larry Teahon</i>
JIM STOKEY	<i>Jim Stokey</i>
RHONDA GRANTHAM	<i>Rhonda Grantham</i>
DOUG PAULICH	<i>Doug Paulich</i>

CAMECO RESOURCES  
RESTORATION AND PONDWATER TREATMENT PROJECT  
CROW BUTTE POND WATER IX TREATMENT  
PROCESS DESCRIPTION

## INTRODUCTION

The existing Crow Butte Plant manages the overall process water balance by discharging plant waste water to one of the three (3) evaporation ponds. The evaporation ponds provide the function of evaporating the water away from the dissolved constituents, reducing the solution volume, while concentrating the contained compounds.

The Pond Water IX Treatment process is being added to give the plant the ability to treat and dispose of the water contained in the evaporation ponds. The goal of treating the pond water is to empty the ponds. Also, the Pond Water IX Treatment process is to be able to treat and dispose of the waste water from yellowcake (YC) thickener overflow, which now flows into the evaporation ponds, should evaporation pond usage be minimized in the future.

The Pond Water Treatment system utilizes filtration, pH adjustment using HCl, ion exchange (IX) with resin, elution of the resin with strong HCL solution, followed by uranium recovery in the existing plant precipitation and yellowcake thickening circuit. The discharge streams will be an IX discharge stream with reduced U<sub>3</sub>O<sub>8</sub> and Vanadium (meeting the deep well disposal criteria), and a strong eluate stream rich in U<sub>3</sub>O<sub>8</sub> and vanadium to be sent to the existing plant precipitation circuit for U<sub>3</sub>O<sub>8</sub> recovery. The pond water will be filtered in a multimedia filter, with the captured sediment and algae being backwashed into the existing evaporation ponds.

The YC Thickener Overflow solution now flows into the evaporation ponds. This is an intermittent operation. In order to eliminate this source of pond water, the stream may be directed to the Deep Disposal Well Surge Tank and co mingled with the plant low level waste water streams before discharging to the DDW. The DDW feed stream is sampled on a routine schedule and the results are compiled to report against the established criteria.

Should U<sub>3</sub>O<sub>8</sub> recovery be indicated, or vanadium removal be desired, the YC Thickener Overflow stream may be redirected to the Pond Water Treatment system. This stream contains excess hydrogen peroxide which could react with the treatment system IX resin, oxidizing and destroying the resin. To prevent resin destruction by the excess peroxide, a multimedia filter containing sand and manganese dioxide is shown. [It is known that hydrogen peroxide, after contact with manganese dioxide, will become unstable and undergo rapid decomposition] This is a catalytic reaction such that the manganese dioxide is not consumed.

The above unit operations in the Pond Water IX Treatment process are tabulated below:  
Pond multimedia filtration,  
YC thickener overflow multimedia filter contactor (to reduce peroxide),  
Feed pH conditioning (using HCl)

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Ion exchange (IX),  
Elution of the loaded resin with strong HCL solution,

Following the above operations the now barren pond water discharge will be sent to the DDW Surge tank for deep well disposal, and the pregnant eluate containing the recovered U3O8 and Vanadium will be sent to the CPP YC precipitation circuit.

These unit operations are adaptations of the processes currently in use by the existing plant.

#### EQUIPMENT LIST

Pump, submersible at the pond, 100 gpm, 3 required, 1 each pond  
Filter, multimedia, 100 gpm, containing sand and garnet, to filter the transferred pond water, backwash to the pond  
Filter, multimedia, 20 gpm. containing sand and manganese dioxide, to trigger peroxide decomposition, backwash to the YC thickener  
Tank, conditioning, HDPE, 2 each 10,000 gal capacity for feed surge and conditioning  
Pump, acid resistant, feed tank circulation during conditioning, 100 gpm, for feed pH conditioning and peroxide destruction  
Mixer, inline, mixing HCl into feed solution to condition feed pH  
Pump, Metering, 12 gpm 7% HCl, base to rapidly approach desired pH target  
Pump, Metering, 1.2 gpm 7% HCl, trim to hit desired pH target  
Pump, Metering, 1.2 gpm 5% NaOH, pH reversal used if pH becomes too acidic  
Tank, NaOH dilution, 50% to 5%, polypropylene, 50 gallon  
Pump, centrifugal, acid resistant, 45 gpm feed to IX column  
Filter, duplex bag filter, PVC, to capture suspended solids in IX feed solution  
Column, IX, 3 required, PVC, ea 4 ft dia x 11 ft hi, w/90 ft<sup>3</sup> TP-207 resin, to capture U3O8 and Vanadium  
Filter, single bag, PVC, resin trap  
Pump, air diaphragm, PVC, 4 req'd, 45 gpm, IX 1, 2, 3, elution, rinse, and drain  
Tank, 2 req'd, Eluate, HDPE, 2800 gal, 7 ft dia x 10 ft hi.  
Mixer, in-line, PVC, makeup eluate mixing 35% HCl to 7% HCl  
Pump, sump, portable air diaphragm, 45 gpm, PVC

#### PROCESS DESCRIPTION

##### POND FEED

Pond water from pond 1 is pumped at the rate of 100 gpm to one of the 2 10,000 gal. Pond Water Treatment conditioning tanks to be located in the new Restoration and Pond Water Treatment building. The water is filtered using a sand/garnet mixed media filter to remove +40 micron suspended solids and algae before flowing into the conditioning tank.

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This feed cycle will be slightly less than 100 minutes at 100 gpm to fill the conditioning tank to the operating level, then will be shut down until the second tank is emptied and valves positioned to receive new pond feed.

Pond inventory control between pond 1, pond 3, and pond 4 will be managed separately to assure a continuous source of blended pond water feed from pond 1.

YC THICKENER FEED (an optional stream)

A 2<sup>nd</sup> stream, the YC thickener overflow, may be introduced. If this option is selected the stream will be pumped into the pond water feed line discharging into the conditioning tank.

This stream contains excess hydrogen peroxide as previously noted which is undesirable as it could react with the IX resin in the subsequent loading columns, destroying the resin.

In order to minimize this possibility, the YC thickener overflow is piped through a multimedia filter, with backwash capability. The filter contains a mixed media bed of manganese dioxide mixed with coarse sand. The sized coarse sand provides permeability. The dispersion of natural manganese dioxide provides maximum surface area for solution contact with the manganese dioxide. A catalytic reaction is triggered when peroxide contacts manganese dioxide, starting a rapid decomposition of the peroxide, producing H<sub>2</sub>O and O<sub>2</sub>. (Safety note: At the low ppm concentration of peroxide in the YC thickener overflow the resulting exothermic reaction of decomposition is totally adsorbed by the mass of the flowing stream) This reaction was tested in CB laboratory and again in the plant test No. 5 on YC thickener overflow.

The combined feed streams charge the selected conditioning tank in less than 2 hours, then are shut down, until the next fill cycle.

FEED CONDITIONING

Feed conditioning is started early during the filling cycle. Filling will continue until the high level of the conditioning tank is reached. The feed pH is expected to be above 7.5.

The tank content is blended for uniformity by operating a 100 gpm recirculation pump, moving the recirculation stream through a static pipe-line mixer and into the conditioning tank during the conditioning period. Acid addition is controlled using pH control and is injected just ahead of an in-line mixer to rapidly obtain uniform pH. The target pH is 4.0 to 4.5.

Should the pH become too low, NaOH may be added to raise the pH to the target level.

During the conditioning period (approximately 3.7 hours) the excess peroxide in the YC stream, previously exposed to manganese dioxide to trigger decomposition, has time to decompose to an acceptable level.

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The circulation will continue until the 2<sup>nd</sup> conditioning tank is empty of IX feed, then the function of the tanks will be switched and the full tank of conditioned feed will become the source of feed to the IX circuit.

The feed filling and conditioning cycle will be repeated, approximately every 3.7 hours. Pond water and YC thickener overflow pumps will be restarted and the empty tank will begin to fill.

#### IX FEED

The IX feed pump will be switched to draw from the conditioned tank. The IX circuit feed rate will be controlled at the design rate of 45 gpm. The feed pump is started, pressurizing the system to 60 psig. The feed, under pressure, passes through a polishing bag filter to the IX columns, finally discharging in the DDW surge tank. The IX column flow will be in series, 1<sup>st</sup> stage, 2<sup>nd</sup> stage, 3<sup>rd</sup> stage. During startup the pH between IX 1 and IX 2 will be monitored for a potential drop in pH, observed during the plant test program. The barren discharge from the 3<sup>rd</sup> stage will be piped through a resin trap filter to hold any resin escaping from a screen break in any of the IX columns. Periodic barren analytic samples will be taken as experience dictates. Loading of the three IX columns will continue until the concentration of either uranium or vanadium in the total cumulative barren solution nears the observed level (determined by operating experience and analytical analysis) to not exceed the DDW feed sample regulatory criteria.

At this point the entire circuit is shut down for elution. Feed condition of the full feed tank may continue. The nearly empty feed tank will be held at the near empty level in readiness to receive spent rinse solution from the 1<sup>st</sup> stage IX column elution process.

The 3<sup>rd</sup> stage and the 2<sup>nd</sup> stage IX columns are drained of residual feed water which is directed forward to the DDW Surge Tank.

The 1<sup>st</sup> stage residual feed water, approximately 800 gallons, is directed back to the idle feed conditioning tank, to limit the amount of feed solution heel remaining in the IX column.

#### BARREN DISCHARGE

The barren discharge of the IX treatment now contains acceptable low levels of U<sub>3</sub>O<sub>8</sub> and vanadium, allowing the stream to be discharged to the plant DDW Surge Tank. In the surge tank the barren discharge mixes with other DDW acceptable waste waters from the plant.

The discharge from the DDW Surge Tank to the DDW will continue to be sampled at specific times to provide a cumulative sample history for compliance DDW discharge criteria.

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ELUTION

Eluate is made up in the eluate makeup tank by adding water and HCl to the make up tank in the following mix ratios

Water added 1 <sup>st</sup> into the makeup eluate tank	1987 gallons, (83% by volume)
35% HCl at 1.17 SG added next into the tank	425 gallons, (17% by volume)
Tank content of 7% acid at 1.035 SG will be	2400 gallons (3 BV)

The makeup eluate tank now contains approximately 3 bed volumes (BV) of eluate. The makeup eluate discharge pump is started, pumping the makeup eluant into the 3<sup>rd</sup> column, stripping the uranium and vanadium from the resin. The solution flows through the column by gravity. The discharge of No. 3 IX is then picked up by switching the IX train valving to countercurrent flow through No. 3 IX, No. 2 IX, and discharging into the empty pregnant eluate tank. The loading on the 3<sup>rd</sup> and 2<sup>nd</sup> IX column resin is light, therefore one countercurrent pass of 3 BV is indicated.

The discharge from the 3rd column will be a weak eluant, and will continuously be pumped into the 2<sup>nd</sup> column. Again, as in the 3<sup>rd</sup> column, only one pass of 3 BV through the 2<sup>nd</sup> column is indicated, producing an intermediate eluate.

The discharge from the 2nd column will continuously be pumped into the pregnant eluate tank. The pregnant eluate tank will be pumped into the 1<sup>st</sup> column, and circulated back into the pregnant eluate tank using IX 1 drain pump. Circulation of the 3 BV moved into the pregnant eluate tank will continue until six (6) BV have been circulated through the heavily loaded 1<sup>st</sup> column resin bed, stripping the resin and producing the final 3 BV of strong pregnant eluate.

The elution system will be shut down as the drain pumps complete the emptying cycle.

After draining, each IX column will be rinsed in a countercurrent flow using the barren water from the DDW Surge Tank. The rinse will require 2-3 BV of rinse water (1600 to 2400 gallons), will be fed countercurrent through IX No. 3, picked up by the No. 3 IX drain pump, pumped into IX No. 2, picked up by the No. 2 drain pump, then be pumped into IX No. 1. The rinse will drain through No. 1, be collected in No. 1 drain pump, and pumped into the idle feed conditioning tank.

In the feed tank new feed will be added, pH adjusted, the spent rinse acid content will be utilized, and the combined feed solution processed back through the IX system during the subsequent process cycle.

Elution is complete. The feed to the IX column will be resumed and the process cycle repeated.

URANIUM RECOVERY

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The strong pregnant eluant from the pond water treatment system will be transferred to the CPP, mixing with the existing pregnant stream. The predicted elution cycle is one elution every 2<sup>nd</sup> day of IX loading. The ratio of this mix, considering down time for elution, is in the range of 1000 gallons per day of pregnant eluant from the pond water treatment, containing approximately 180 gallons of 35% HCl, to be added to 20,000 to 40,000 gallons per day of eluate from normal plant elution operations. The strong acid content of the eluate from pond water treatment will reduce the requirement for new acid in the CPP precipitation process.

End



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**SERP 09-02 Evaluation**

**CAMECO RESOURCES  
CROW BUTTE OPERATION**



**SERP 09-02**

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**Crow Butte Resources, Inc.**

**Safety and Environmental Review Panel**

**Evaluation Report – SERP 09-02**

**Approval to Operate South Booster Pump Station**

**April 14, 2009**

The Crow Butte Resources, Inc. (CBR) Safety and Environmental Review Panel (SERP) met to review and approve the operation of an injection line booster pump station for injection into Mine Units 9 and 11.

The SERP appointed for this evaluation consisted of the following members:

<u>Name</u>	<u>Title</u>	<u>Area of Expertise</u>
Jim Stokey	General Manager	Management
Doug Pavlick	Operations Manager	Operations
Larry Teahon	Manager of Health, Safety, and Environmental Affairs	Safety
Rhonda Grantham	Radiation Safety Officer	Radiation Safety
Bob Tiensvold	Maintenance Superintendent	Construction
Tate Hagman	Administrative Supervisor	Instrumentation

Mr. Stokey is the SERP Chairman. Mr. Teahon was appointed SERP Secretary for this evaluation.

**Purpose of SERP Evaluation**

The purpose of this evaluation by the CBR SERP is to review and approve the operation of a booster pump station for Mine Units 9 and 11.

## CAMECO RESOURCES CROW BUTTE OPERATION



### SERP 09-02

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License Condition 9.4 allows CBR to make changes in the facility or procedures or conduct tests or experiments that are not presented in the approved application if such changes do not:

- i. Result in any appreciable increase in the frequency of occurrence of an accident previously evaluated in the license application (as updated);
- ii. Result in any appreciable increase in the likelihood of occurrence of a malfunction of a structure, system, or component (SSC) important to safety previously evaluated in the license application (as updated);
- iii. Result in any appreciable increase in the consequences of an accident previously evaluated in the license application (as updated);
- iv. Result in any appreciable increase in the consequences of a malfunction of an SSC previously evaluated in the license application (as updated);
- v. Create a possibility for an accident of a different type that any previously evaluated in the license application (as updated);
- vi. Create a possibility for a malfunction of an SSC with a different result than previously evaluated in the license application (as updated);
- vii. Result in a departure from the method of evaluation described in the license application (as updated) used in establishing the final safety evaluation report (FSER) or the environmental assessment (EA) or the technical evaluation reports (TERs) or other analysis and evaluations for license amendments.
- viii. For the purposes of SERP evaluations, SSC means any SSC which has been referenced in a staff SER, TER, EA, or environmental impact statement (EIS) and supplements and amendments.

The SERP evaluation was conducted in accordance with the instructions contained in the Environmental, Health, and Safety Management System (EHSMS) Volume II, *Management Procedures*, EHS-6, *Managing Change*. The SERP reviewed the licensing requirements, including the following documents:

- Title 10, Code of Federal Regulations;
- Source Materials License SUA-1534, Amendment No. 23 dated May 12, 2008;
- *Application for Renewal of USNRC Radioactive Source Materials License SUA-1534*, Crow Butte Resources, Inc. December 1995;
- *Environmental Assessment for Renewal of Source Materials License No. SUA-1534*, USNRC February 1998;
- *Safety Evaluation Report for Renewal of Source Materials License No. SUA-1534*, USNRC February 1998;
- Technical Evaluation Reports issued in support of amendments to SUA-1534.

# CAMECO RESOURCES CROW BUTTE OPERATION



SERP 09-02

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## Title 10 Code of Federal Regulations

The proposed change will have no impact on CBR's ability to meet all applicable NRC regulations.

## Source Materials License SUA-1534 Requirements

Amendment 23 to SUA-1534 dated May 12, 2008 was reviewed for specific requirements related to approval and operation of the booster pump station.

License Condition 9.3: This License Condition requires that CBR conduct operations in accordance with the representations contained in the LRA. Section 3.1.3 of the LRA discusses construction materials, instrumentation, and monitoring requirements. Section 3.3 also discusses instrumentation, including wet building alarms for wellhouses. Section 7.2.3 of the LRA requires that leak tests be performed on all wellfield piping before placing the system into production operations.

The SERP reviewed the Booster Pump Station checklist and Pressure Testing sheets. These checklists were developed by the Wellfield Construction staff to document completion of all required actions before initiating operation of this booster pump station. Some of these actions are required by regulatory and licensing requirements, while some were developed over the course of mining experience at Crow Butte. Construction activities are governed by EHSMS Volume III, *Operations Manual*, Procedure P-15, *Installation of Wellfield Pipelines*. The Maintenance Superintendent reviewed these items and stated that all had been completed and the appropriate controls were in place.

A copy of the testing sheets and support documentation is attached to this SERP Evaluation.

## Environmental Assessment

The SERP reviewed the contents of the Environmental Assessment (EA) prepared by NRC in February 1998 to determine whether the proposed change could cause substantive safety or environmental impacts.

Section 3.3.1 discusses leak testing of wellfield piping. The SERP reviewed the completion of pressure testing for piping systems associated with this booster pump station and found that they meet the intent of the EA.

**CAMECO RESOURCES  
CROW BUTTE OPERATION**



**SERP 09-02**

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**Financial Surety**

The proposed change is covered in the NRC-approved financial surety maintained by CBR and approved by Amendment 23 to SUA-1534 in the amount of \$25,207,672.

**Safety Evaluation Report**

The Safety Evaluation Report (SER) principally provides the basis for worker safety at Crow Butte and does not specifically address the issues related to approval of startup of booster pump station.

**Technical Evaluation Reports**

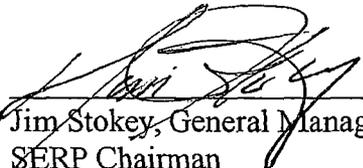
The SERP reviewed the Technical Evaluation Reports (TERs) prepared by NRC staff to support amendments made to SUA-1534 since renewal in 1998. None of the TERs prepared since license renewal directly address issues related to approval of a booster pump station for operation.

**Degradation of Essential Safety or Environmental Commitment**

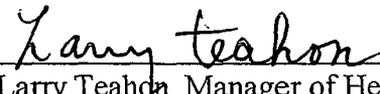
SUA-1534 allows CBR to make changes as long as they do not degrade the essential safety or environmental commitments made in the application. The SERP determined that safety commitments made in the LRA and discussed in the EA have been met and that start up of this booster pump station will not degrade the safety and environmental commitments.

Based upon this evaluation of the licensing basis, the CBR SERP hereby approves start up and operation of the booster pump station.

Approved this 14th day of April, 2009.

  
\_\_\_\_\_  
Jim Stokey, General Manager  
SERP Chairman

4/21/09

  
\_\_\_\_\_  
Larry Teahon, Manager of Health, Safety, and Environmental Affairs  
SERP Secretary

4/21/09

CAMECO RESOURCES  
CROW BUTTE OPERATION



SERP 09-02

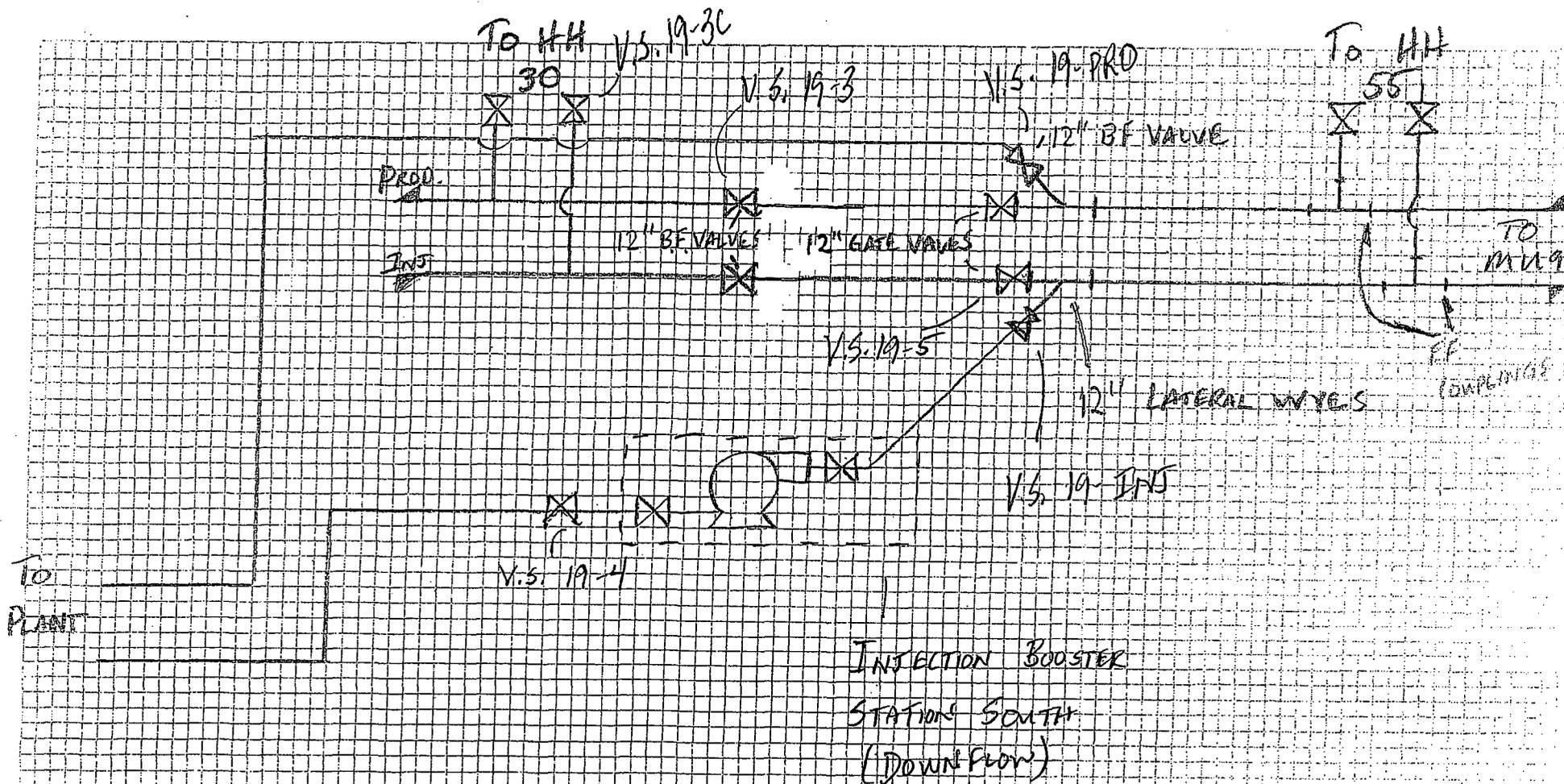
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Rhonda Grantham 4/21/09  
Rhonda Grantham, Radiation Safety Officer

Doug Payfick 4/21/09  
Doug Payfick, Operations Manager

Bob Tiensvold 4/21/2009  
Bob Tiensvold, Maintenance Superintendent

Tate Hagman 4-21-09  
Tate Hagman, Administrative Supervisor



NEW TL PIPING

MINE UNITS  
 9 & 11 ARE DOWN  
 STREAM OF THE  
 PUMP.



**CROW BUTTE RESOURCES, INC.**

86 Crow Butte Road

P. O. Box 169

Crawford, Nebraska 69339-0169

(308) 665-2215

(308) 665-2341 - FAX

---

GROUND RESISTANCE TEST RECORD

TEST SET USED: AEMC Model 3711 Ground Resistance Tester

GROUND TEST RESULTS: Injection Booster Station South (Down Flow)

OHMS:  $1/R_t = 1/6.5 + 1/1.8 = 1.16$  OHMS

CONCLUSIONS:

THE TEST RESULTS ARE SATISFACTORY

TEST PERFORMED BY:

CROW BUTTE RESOURCES, INC.



Bob Tiensvold

Date: April 13, 2009

BOOSTER PUMP GROUND CONTINUITY CHECKS:

Pump 1 - .6  $\Omega$

Pump 2 - .6  $\Omega$

Pump 3 - .5  $\Omega$

Pump 4 - .6  $\Omega$

Pump 5 - N/A

Pump 6 - N/A

SLC Cab - 1.1  $\Omega$

LIGHTING PANEL - .9  $\Omega$

BUILDING FRAME - .2  $\Omega$

FLUKE METER MODEL 336

PERFORMED BY:



**CROW BUTTE RESOURCES, INC.**

86 Crow Butte Road  
P.O. Box 169  
Crawford, Nebraska 69339-0169



(308) 665-2215  
(308) 665-2341 – FAX

**MEMORANDUM**

**TO:** File  
**FROM:** Kirk McDowell  
**DATE:** March 31, 2009  
**SUBJECT:** Injection Booster Pump Station

Pressure-check verification for injection booster pump station.

On March 21, 2009, the new injection line of booster pump station was pressure-tested from Plant to Valve Station 19 - INJ:

Start – 125 psi

60 minutes

Stop – 122 psi

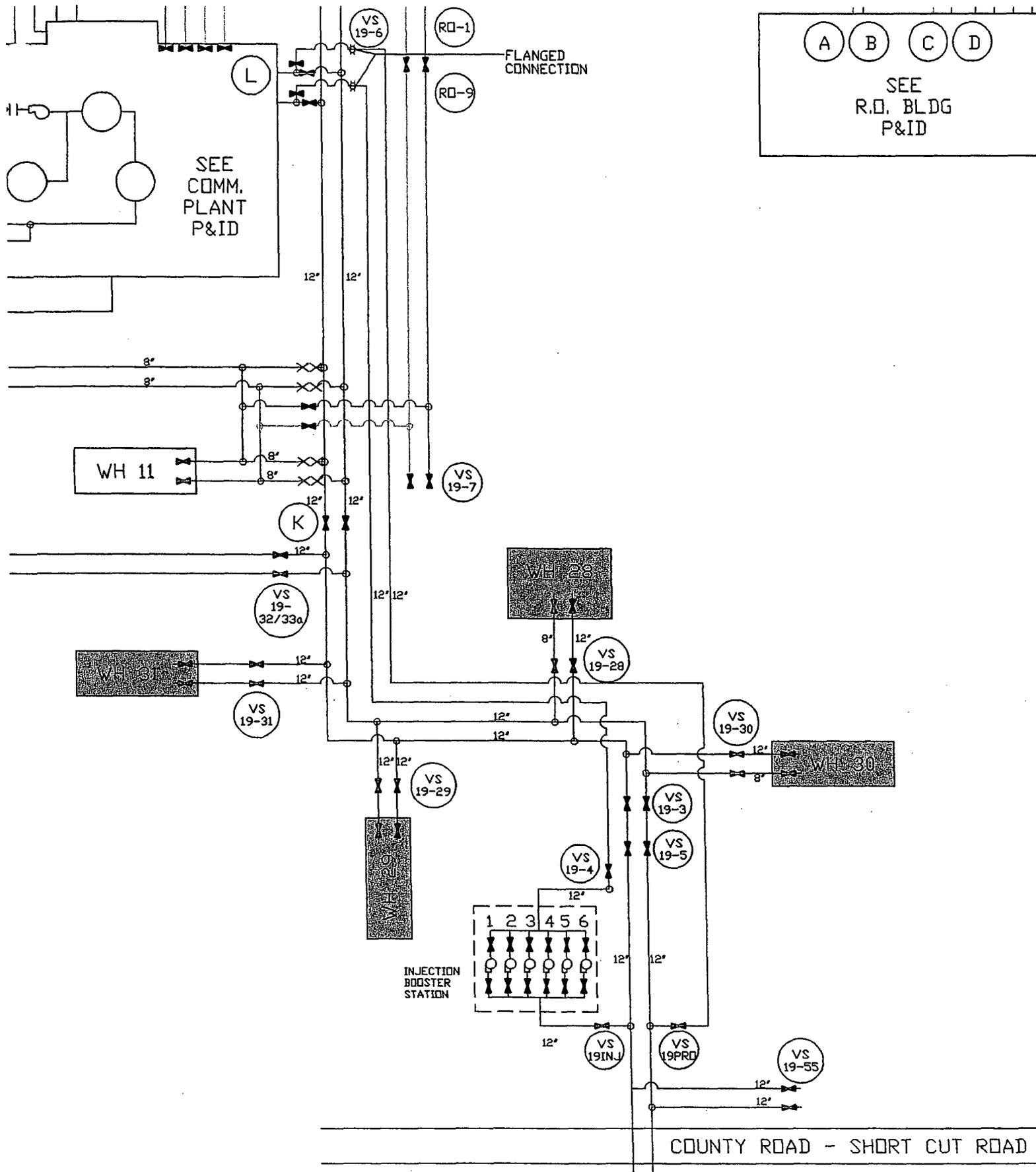
On March 27, 2009, the new production line was pressure-tested from the Plant to Valve Station 19 - PRO.

Start – 125 psi

60 minutes

Stop – 123 psi

  
\_\_\_\_\_  
Kirk McDowell  
Wellfield Construction Foreman



**CROW BUTTE RESOURCES, INC.**



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**SERP 09-03 Evaluation**



**SERP 09-03**

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**Crow Butte Resources, Inc.**

**Safety and Environmental Review Panel**

**Evaluation Report – SERP 09-03**

**Wellhouse 29A Approval to Operate**

**May 21, 2009**

The Crow Butte Resources, Inc. (CBR) Safety and Environmental Review Panel (SERP) met to review and approve operation of Wellhouse 29A in Mine Unit 7 at the Crow Butte Uranium Project.

The SERP appointed for this evaluation consisted of the following members:

<u>Name</u>	<u>Title</u>	<u>Area of Expertise</u>
Jim Stokey	General Manager	Management
Larry Teahon	Manager of Health, Safety and Environmental Affairs	Environmental
Doug Pavlick	Operations Manager	Operations
Ron Herrick	Safety Supervisor	Radiation Safety
Bob Tiensvold	Maintenance Superintendent	Construction
Wade Beins	Senior Geologist	Well Construction
Tate Hagman	Administrative Supervisor	Instrumentation

Dr. Stokey is the SERP Chairman. Mr. Teahon was appointed SERP Secretary for this evaluation.

**Purpose of SERP Evaluation**

The purpose of this evaluation by the CBR SERP was to review and approve Wellhouse 29A for operation. Additional wells were drilled in Mine Unit 7 to recover some low

## CAMECO RESOURCES CROW BUTTE OPERATION



SERP 09-03

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grade ore that exists in this area. Some of these wells have been plumbed into existing Wellhouse 29. The new wells associated with this wellhouse are designated as Wellhouse 29A.

License Condition 9.4 allows CBR to make changes in the facility or procedures or conduct tests or experiments that are not presented in the approved application if such changes do not:

- i. Result in any appreciable increase in the frequency of occurrence of an accident previously evaluated in the license application (as updated);
- ii. Result in any appreciable increase in the likelihood of occurrence of a malfunction of a structure, system, or component (SSC) important to safety previously evaluated in the license application (as updated);
- iii. Result in any appreciable increase in the consequences of an accident previously evaluated in the license application (as updated);
- iv. Result in any appreciable increase in the consequences of a malfunction of an SSC previously evaluated in the license application (as updated);
- v. Create a possibility for an accident of a different type that any previously evaluated in the license application (as updated);
- vi. Create a possibility for a malfunction of an SSC with a different result than previously evaluated in the license application (as updated);
- vii. Result in a departure from the method of evaluation described in the license application (as updated) used in establishing the final safety evaluation report (FSER) or the environmental assessment (EA) or the technical evaluation reports (TERs) or other analysis and evaluations for license amendments.
- viii. For the purposes of SERP evaluations, SSC means any SSC which has been referenced in a staff SER, TER, EA, or environmental impact statement (EIS) and supplements and amendments.

The SERP evaluation was conducted in accordance with the instructions contained in the Environmental, Health, and Safety Management System (EHSMS) Volume II, *Management Procedures*, EHS-6, *Managing Change*. The SERP reviewed the Wellhouse startup checklists and supporting documentation and evaluated this information as compared with the requirements of the licensing basis, including the following documents:

- Title 10, Code of Federal Regulations;
- Source Materials License SUA-1534, Amendment No. 21 dated January 29, 2007;
- *Application for Renewal of USNRC Radioactive Source Materials License SUA-1534*, Crow Butte Resources, Inc. December 1995;

# CAMECO RESOURCES CROW BUTTE OPERATION



SERP 09-03

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- *Environmental Assessment for Renewal of Source Materials License No. SUA-1534*, USNRC February 1998;
- *Safety Evaluation Report for Renewal of Source Materials License No. SUA-1534*, USNRC February 1998;
- Technical Evaluation Reports issued in support of amendments to SUA-1534.

## **Title 10 Code of Federal Regulations**

The proposed change will have no impact on CBR's ability to meet all applicable NRC regulations.

## **Source Materials License SUA-1534 Requirements**

Amendment 23 to SUA-1534 dated May 12, 2009 was reviewed for specific requirements related to approval and operation of a wellhouse.

Mine Unit 7 was previously approved by a CBR SERP (see SERP 99-02 dated July 8, 1999). Therefore, no review of monitor well location, installation or baseline sampling and Upper Control Limit determination is required for approval of Wellhouse 29A.

**License Condition 10.2:** This License Condition requires that CBR construct all wells in accordance with the methods contained in the Section 3.1.2 of the approved License Renewal Application (LRA). License Condition 10.2 also requires that CBR perform mechanical integrity tests (MIT) for all injection and production wells.

The well construction methods in use for Wellhouse 29A are the same as those described in the LRA and contained in EHSMS Volume III, *Operations Manual*, Procedure P-25, *Well Installation*. MITs were performed in accordance with EHSMS Volume III, *Operations Manual*, Procedure P-23, *Mechanical Integrity Test (MIT)*. All MIT data sheets were contained in the Notice of Intent to Operate Wellhouse 29A (or in the original Mine Unit 7 Notice of Intent) that was submitted to the NDEQ. These MIT data sheets were provided by the Senior Geologist and reviewed by the SERP. The records indicate that the MITs performed in Wellhouse 29A met the requirements.

**License Condition 9.3:** This License Condition requires that CBR conduct operations in accordance with the representations contained in the LRA. Section 3.1.3 of the LRA discusses construction materials, instrumentation, and monitoring requirements. Section 3.3 also discusses instrumentation, including wellhouse injection and production instrumentation and wet building alarms for wellhouses. Section 7.2.3 of the LRA requires that leak tests be performed on all wellfield piping before placing the system into production operations.

# CAMECO RESOURCES CROW BUTTE OPERATION



SERP 09-03

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The SERP reviewed the Wellhouse Start-up Checklist for Wellhouse 29A. This checklist was developed by the Wellfield Construction staff to document completion of all required actions before initiating operations in a wellhouse. Some of these actions are required by regulatory and licensing requirements, while some were developed over the course of mining experience at Crow Butte. Construction activities are governed by EHSMS Volume III, *Operations Manual*, Procedure P-15, *Installation of Wellfield Pipelines*. The Maintenance Superintendent reviewed these items and stated that all had been completed and the appropriate controls were in place.

A copy of the Wellhouse Start-Up Checklist is attached to this SERP Evaluation. Supporting documentation in the form of pressure tests and ground continuity checks are also attached. Because this is an existing wellhouse, not all items on the Start-Up Checklist would apply. These items were covered in the initial start-up of the wellhouse.

## **Environmental Assessment**

The SERP reviewed the contents of the Environmental Assessment (EA) prepared by NRC in February 1998 to determine whether the proposed change could cause substantive safety or environmental impacts.

Well construction and testing as described in the EA has been completed for the wells associated with Wellhouse 29A.

Section 3.3.1 discusses leak testing of wellfield piping. The SERP reviewed the completion of pressure testing for piping systems associated with Wellhouse 29A and found that they meet the intent of the EA.

## **Financial Surety**

The proposed change is covered in the NRC-approved financial surety maintained by CBR and approved by Amendment 23 to SUA-1534 in the amount of \$25,207,672.

## **Safety Evaluation Report**

The Safety Evaluation Report (SER) principally provides the basis for worker safety at Crow Butte and does not specifically address the issues related to approval of Wellhouse 29A.

## **Technical Evaluation Reports**

**CAMECO RESOURCES  
CROW BUTTE OPERATION**



**SERP 09-03**

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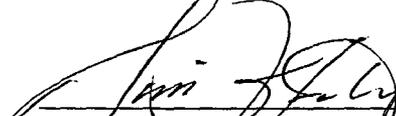
The SERP reviewed the Technical Evaluation Reports (TERs) prepared by NRC staff to support amendments made to SUA-1534 since renewal in 1998. None of the TERs prepared since license renewal directly address issues related to approval of a new Wellhouse for operation.

**Degradation of Essential Safety or Environmental Commitment**

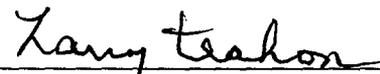
SUA-1534 allows CBR to make changes as long as they do not degrade the essential safety or environmental commitments made in the application. The SERP determined that safety commitments made in the LRA and discussed in the EA have been met and that startup of Wellhouse 29A in Mine Unit 7 will not degrade the safety and environmental commitments.

Based upon this evaluation of the licensing basis, the CBR SERP hereby approves startup and operation of Wellhouse 29A in Mine Unit 7.

Approved this 21st day of May, 2009.

  
\_\_\_\_\_  
Jim Stokey, General Manager  
SERP Chairman

  
\_\_\_\_\_  
Doug Paylick, Operations Manager

  
\_\_\_\_\_  
Larry Teahon, Manager of Health, Safety and Environmental Affairs  
SERP Secretary

  
\_\_\_\_\_  
Ron Herrick, Safety Supervisor (Radiation Safety Designee)

  
\_\_\_\_\_  
Bob Tiensvold, Maintenance Superintendent

**CAMECO RESOURCES  
CROW BUTTE OPERATION**



**SERP 09-03**

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*Wade Beins*

Wade Beins, Senior Geologist

*Tate Hagman*

Tate Hagman, Administrative Supervisor

Well House Start-Up Checklist

Well House # 29A

Item	Description	Person	Comments	Date Completed	Initial
1	Permit To Operate	Beins / Tiensvold / Stokey		5/21/09	WB
2	Complete Pressure Testing (Trunkline and House)	McDowell / Tiensvold / Stokey	LATERALS	5/19	(BD)
3	Pipelines checked for leaks	McDowell / Tiensvold / Stokey		5/19	(BD)
4	Pipelines buried	McDowell / Tiensvold / Stokey		5/20	(BD)
5	Pressure gauge on injection manifold	McDowell / Tiensvold / Stokey	N/A		(BD)
6	Injection lines equipped with totalizing flow meters	McDowell / Tiensvold / Stokey		5/19	(BD)
7	Injection and Production total flows can be measured	Hagman / Tiensvold / Stokey		5/19	TH
8	Unused trunkline locked out by two separate means	McDowell / Tiensvold / Stokey	N/A		(BD)
9	Isolation valves are closed and chained	McDowell / Tiensvold / Stokey	N/A		(BD)
10	Map of 2" lines in house	McDowell / Beins / Tiensvold / Stokey		5/21	(BD)
11	Well-field Layout map in house	McDowell / Beins / Tiensvold / Stokey		5/21	(BD)
12	Check berms	Teahon / Tiensvold / Stokey	EXISTING OK	5/21	(BD)
13	Pressure check oxygen lines	Roberts / McDowell / Tiensvold / Stokey	N/A		(BD)
14	Continuity check on producers	Tiensvold / Stokey		5-20-09	TH
15	Ground fault check	REA / Tiensvold / Stokey	N/A		(BD)
16	Communications wire check	Hagman / Tiensvold / Stokey		5-20-09	TH
	Water size check	Tiensvold / Stokey	BUCKETS BEING INSTALLED	5/20/09	(BD)
17	Processor installed well house	Hagman / Tiensvold / Stokey	N/A		(BD)
18	UPS installed and operational	Hagman / Tiensvold / Stokey	N/A		(BD)
19	Wet house alarm installed	Tiensvold / Stokey	N/A		(BD)
20	Wet house alarm checked	Hagman / Tiensvold / Stokey	N/A		(BD)
21	Oxygen solenoid checked	Hagman / Tiensvold / Stokey	N/A		(BD)
22	Check fuses in control panel	Tiensvold / Stokey	N/A		(BD)
23	Program MMI	Tiensvold / Stokey		5/20	TH
24	Program PLC	Tiensvold / Stokey		5/20	TH
25	Set Scalar Card 'K' Factors	P. Dunn / K. Forbes / Tiensvold / Stokey		5/21	TH
26	Off tags and lockouts	Tiensvold / Stokey	BUCKETS NOT INSTALLED	5/21	(BD)
27	Contaminated and uncontaminated cans	P. Dunn / K. Forbes / Tiensvold / Stokey	N/A		(BD)
28	Complete 2" lateral inspection	McDowell / Tiensvold / Stokey		5/20/2009	(BD)
29	Visually inspect entire system to plant	Tiensvold / Stokey		5/20/2009	(BD)
30	Labels on Monitor Wells	McDowell / Tiensvold / Stokey	N/A		(BD)
31	Valve Station Covers and Stairs Built	R. Roberts / Tiensvold / Stokey	N/A		(BD)
32	Manifold Pressure Switches installed	Tiensvold / Stokey	N/A		(BD)
33	Injection Filter installed	McDowell / Tiensvold / Stokey	N/A		(BD)
34	Filter instrumentation and gauges installed	Tiensvold / Stokey	N/A		(BD)
35	Electronic door lock installed	Tiensvold / Stokey	N/A		(BD)



# CROW BUTTE PROJECT

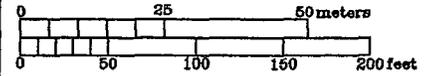
MINE UNIT 7 WELLHOUSE 29 ADD IN MAP

S<sup>1</sup>/<sub>2</sub> SEC 19 T31N R 51W

□ 1950 Production Well    — Wellhouse Boundary

△ 1958 Injection Well

○ SM7-2 Monitor Well

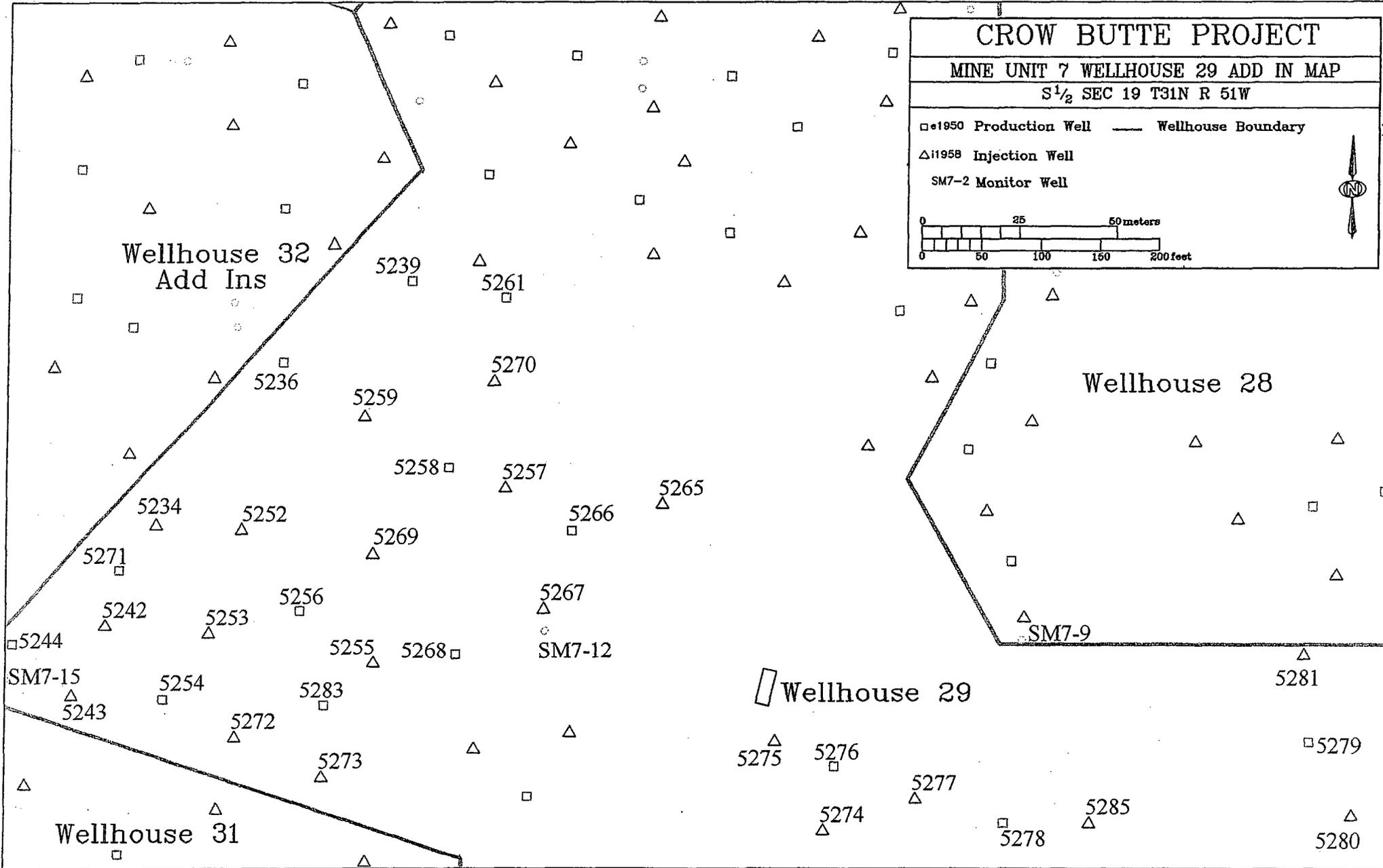


Wellhouse 32  
Add Ins

Wellhouse 28

Wellhouse 29

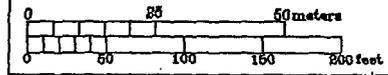
Wellhouse 31



CAMECO RESOURCES  
CROW BUTTE OPERATION  
WELLHOUSE 29 ADD IN MAP

S<sup>1</sup>/<sub>2</sub> SEC 19 T31N R 51W

- 1950 Production Well
- △ 1958 Injection Well
- SM7-2 Monitor Well

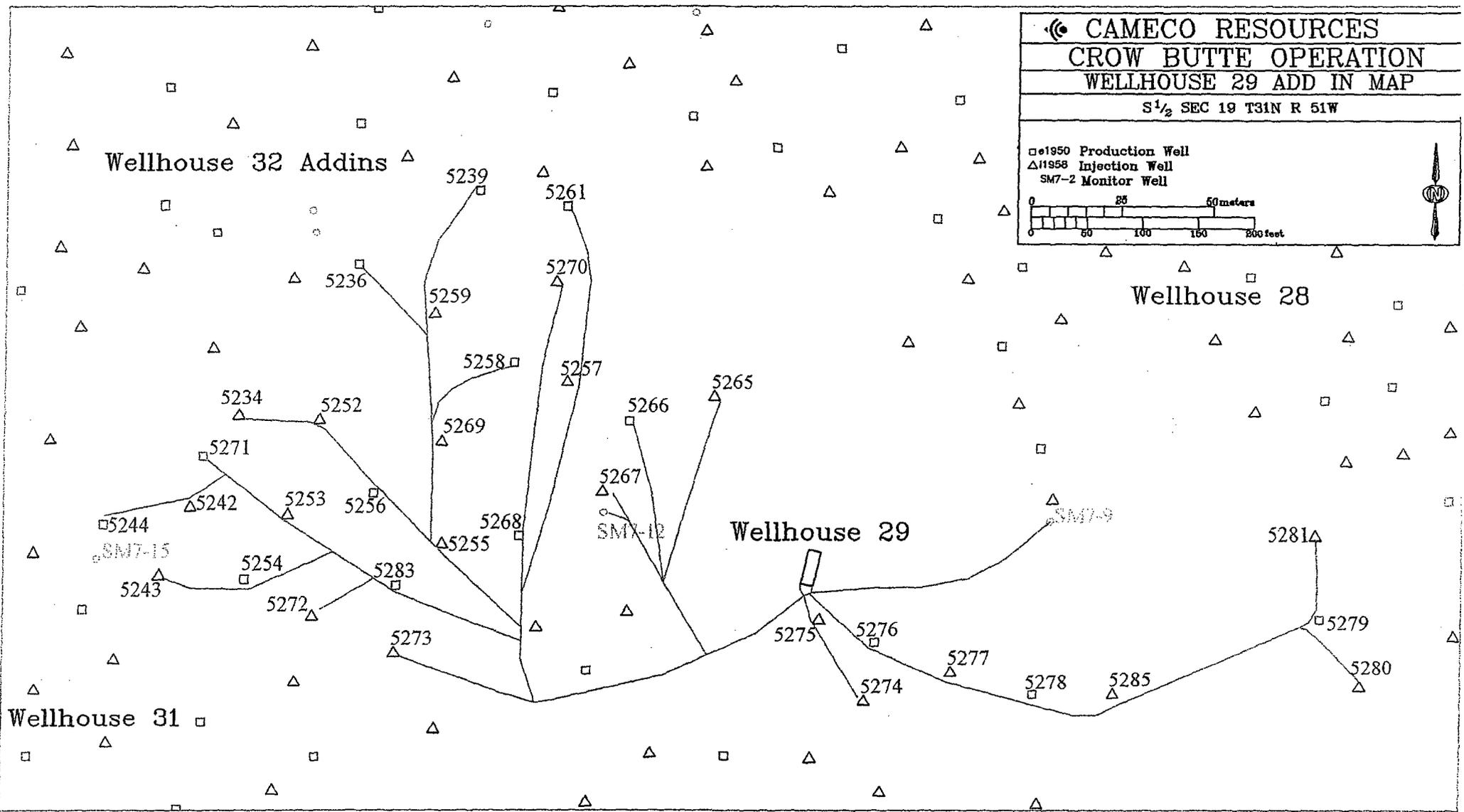


Wellhouse 32 Addins

Wellhouse 28

Wellhouse 29

Wellhouse 31



# Crow Butte Resources

Final Inspection of Piping Wellhead to Plant

Wellhouse: 0

Review of Pressure Test Data Complete: BT

Date: 5-19-09

Mine Manager: \_\_\_\_\_

W.F.C. Foreman: Bob R...

Non-Service Lines Locked-Out: YES (X)

Item #	Well #	Initialed by	Comments
1	P 5236	JT ok	Need wired
2	P 5239	JT ok	Need wired
3	P 5244	JT ok	Need wired
4	P 5254	JT ok	Need wired
5	P 5256	JT ok	Need wired
6	P 5258	JT ok	Need wired
7	P 5261	JT ok	Need wired
8	P 5266	JT ok	Need wired
9	P 5268	JT ok	Need wired
10	P 5271	JT ok	Need wired
11	P 5276	JT ok	Need wired
12	P 5278	JT ok	Need wired
13	P 5279	JT ok	Need wired
14	P 5283	JT ok	Need wired
15			
16			
17			
18			
19			

Item #	Well #	Initialed by	Comments
20			
21			
22			
23			
24			
25			
26			
27			
28			
29			
30			

Item #	Well #	Initialed by	Comments
1	I 5234	JT	OK
2	I 5242	JT	OK
3	I 5243	JT	OK
4	I 5252	JT	OK
5	I 5253	JT	OK
6	I 5255	JT	OK
7	I 5257	JT	OK
8	I 5259	JT	OK
9	I 5265	JT	OK
10	I 5267	JT	OK
11	I 5269	JT	OK
12	I 5270	JT	OK
13	I 5272	JT	OK
14	I 5273	JT	OK
15	I 5274	JT	OK
16	I 5275	JT	OK
17	I 5277	JT	OK
18	I 5280	JT	OK
19	I 5281	JT	OK

Item #	Well #	Initialed by	Comments
20	I 5285	JT	OK
21			
22			
23			
24			
25			
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29			
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35			
36			
37			
38			



**Well House Pressure Check Verification**

Pressure check for Well House 29A

Date: 1/19/2009

**Injection:**

On 5/14 - 5/18 the injection lines and 2" laterals were pressured to 100 psi. This was done using a centrifugal pump and potable water. The time interval was as follows:

Start: 100 psi at ~~\_\_\_\_\_~~ AM / PM 5 minutes  
Stop: 95 psi at ~~\_\_\_\_\_~~ AM / PM

The section of trunk line checked was from valve station \_\_\_\_\_ to the well field in \_\_\_\_\_

EACH LINE WAS CHECKED INDIVIDUALLY

**Production:**

On 5/14 - 5/18 the production trunk lines and 2" laterals were pressured to 100 psi. This was done using a centrifugal pump and potable water. The pressure and time interval was as follows:

Start: 100 psi at ~~\_\_\_\_\_~~ AM / PM 5 minutes  
Stop: 95 psi at ~~\_\_\_\_\_~~ AM / PM

The section of trunk line was from valve station \_\_\_\_\_ to the well field in \_\_\_\_\_

EACH LINE WAS CHECKED INDIVIDUALLY

**Oxygen:**

On \_\_\_\_\_ the oxygen line was pressured to \_\_\_\_\_ psi. The pressure and time interval was as follows:

Start: \_\_\_\_\_ psi at \_\_\_\_\_ AM / PM  
Stop: \_\_\_\_\_ psi at \_\_\_\_\_ AM / PM N/A

The section of trunk line checked was from valve station \_\_\_\_\_ to the well field in \_\_\_\_\_

Well Field Construction Foreman

Bob [Signature] - WFL Supervisor

# CROW BUTTE RESOURCES, INC.



MEMORANDUM

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**TO:** File

**FROM:** Bob Tiensvold *BT*

**DATE:** 5/20/2009

**SUBJECT:** HH 29A lateral lines pressure check

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On May 14, 15, and 18, 2009 the lateral production and injection lines installed in HH 29A from the header house to the individual well heads were pressure checked. The pressure check included the poly pipe to gorilla hose weld fittings as well as the gorilla hoses themselves. All lines were pressure checked individually by being pumped up to 100 psi using a centrifugal pump while not losing more than 5 psi in 5 minutes. All lines passed the pressure check. Listed below are the individual lines tested.

**Producers:**

5236, 5239, 5244, 5254, 5256, 5258, 5261, 5266, 5268, 5271, 5276, 5278, 5279, 5283

**Injectors:**

5234, 5242, 5243, 5252, 5253, 5255, 5257, 5259, 5265, 5267, 5269, 5270, 5272, 5273, 5274, 5275, 5277, 5280, 5281, 5285



**CROW BUTTE RESOURCES, INC.**



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**SERP 09-04 Evaluation**



**SERP 09-04**

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**Crow Butte Resources, Inc.**

**Safety and Environmental Review Panel**

**Evaluation Report – SERP 09-04**

**Approval to Operate Additional Wells in Wellhouses 23 and 48  
and  
Replacement Well 5319A in Wellhouse 51**

**July 9, 2009**

The Crow Butte Resources, Inc. (CBR) Safety and Environmental Review Panel (SERP) met to review and approve in Mine Unit 10 the replacement of a well in Wellhouse 51 and in Mine Unit 6 the addition of a new well to Wellhouse 48 and the addition of three new wells to Wellhouse 23.

The SERP appointed for this evaluation consisted of the following members:

<u>Name</u>	<u>Title</u>	<u>Area of Expertise</u>
Doug Pavlick	Operations Manager	Management (designee)
Larry Teahon	Manager of Health, Safety, and Environmental Affairs	Safety
Rhonda Grantham	Radiation Safety Officer	Radiation Safety
Bob Tiensvold	Maintenance Superintendent	Construction
Wade Beins	Senior Geologist	Well Construction

Mr. Pavlick is the SERP Chairman. Mr. Teahon was appointed SERP Secretary for this evaluation.

**Purpose of SERP Evaluation**

# CAMECO RESOURCES CROW BUTTE OPERATION



## SERP 09-04

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The purpose of this evaluation by the CBR SERP was to review and approve the operation of replacement well 5319A in Wellhouse 51 and the addition of one new well (5640) in Wellhouse 48 and three new wells (1921, 1922, and 1923) in Wellhouse 23.

License Condition 9.4 allows CBR to make changes in the facility or procedures or conduct tests or experiments that are not presented in the approved application if such changes do not:

- i. Result in any appreciable increase in the frequency of occurrence of an accident previously evaluated in the license application (as updated);
- ii. Result in any appreciable increase in the likelihood of occurrence of a malfunction of a structure, system, or component (SSC) important to safety previously evaluated in the license application (as updated);
- iii. Result in any appreciable increase in the consequences of an accident previously evaluated in the license application (as updated);
- iv. Result in any appreciable increase in the consequences of a malfunction of an SSC previously evaluated in the license application (as updated);
- v. Create a possibility for an accident of a different type that any previously evaluated in the license application (as updated);
- vi. Create a possibility for a malfunction of an SSC with a different result than previously evaluated in the license application (as updated);
- vii. Result in a departure from the method of evaluation described in the license application (as updated) used in establishing the final safety evaluation report (FSER) or the environmental assessment (EA) or the technical evaluation reports (TERs) or other analysis and evaluations for license amendments.
- viii. For the purposes of SERP evaluations, SSC means any SSC which has been referenced in a staff SER, TER, EA, or environmental impact statement (EIS) and supplements and amendments.

The SERP evaluation was conducted in accordance with the instructions contained in the Environmental, Health, and Safety Management System (EHSMS) Volume II, *Management Procedures*, EHS-6, *Managing Change*. The SERP reviewed the licensing requirements, including the following documents:

- Title 10, Code of Federal Regulations;
- Source Materials License SUA-1534, Amendment No. 23 dated May 12, 2008;
- *Application for Renewal of USNRC Radioactive Source Materials License SUA-1534*, Crow Butte Resources, Inc. December 1995;
- *Environmental Assessment for Renewal of Source Materials License No. SUA-1534*, USNRC February 1998;

# CAMECO RESOURCES CROW BUTTE OPERATION



**SERP 09-04**

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- *Safety Evaluation Report for Renewal of Source Materials License No. SUA-1534*, USNRC February 1998;
- Technical Evaluation Reports issued in support of amendments to SUA-1534.

## **Title 10 Code of Federal Regulations**

The proposed change will have no impact on CBR's ability to meet all applicable NRC regulations.

## **Source Materials License SUA-1534 Requirements**

Amendment 23 to SUA-1534 dated May 12, 2008 was reviewed for specific requirements related to approval and operation of additional wells.

Mine Unit 10 was previously approved by SERP 07-01 dated April 10, 2007. Therefore, no review of monitor well location, installation or baseline sampling and Upper Control Limit determination is required for this approval. The start up of Wellhouse 51 was approved by SERP 08-03 dated May 9, 2007, the start up of Wellhouse 48 was approved by SERP 07-01 date April 10, 2007, and the start up of Wellhouse 23 was approved by SERP 01-98 date March 4, 1998.

**License Condition 10.2:** This License Condition requires that CBR construct all wells in accordance with the methods contained in the Section 3.1.2 of the approved License Renewal Application (LRA). License Condition 10.2 also requires that CBR perform mechanical integrity tests (MIT) for all injection and production wells.

The well construction methods in use for Wellhouses 51, 48 and 23 are the same as those described in the LRA and contained in EHSMS Volume III, *Operations Manual*, Procedure P-25, *Well Installation*. MITs were performed in accordance with EHSMS Volume III, *Operations Manual*, Procedure P-23, *Mechanical Integrity Test (MIT)*. The MIT data sheets were provided by the Senior Geologist and reviewed by the SERP. The records indicate that the MITs performed in Wellhouses 51, 48 and 23 met the requirements.

**License Condition 9.3:** This License Condition requires that CBR conduct operations in accordance with the representations contained in the LRA. Section 3.1.3 of the LRA discusses construction materials, instrumentation, and monitoring requirements. Section 3.3 also discusses instrumentation, including wellhouse injection and production instrumentation and wet building alarms for wellhouses. Section 7.2.3 of the LRA requires that leak tests be performed on all wellfield piping before placing the system into production operations.

# CAMECO RESOURCES CROW BUTTE OPERATION



SERP 09-04

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The SERP reviewed the Final Inspection of Piping Wellhead to Plant and Pressure Testing sheets. These checklists were developed by the Wellfield Construction staff to document completion of all required actions before initiating operations of these wells. Some of these actions are required by regulatory and licensing requirements, while some were developed over the course of mining experience at Crow Butte. Construction activities are governed by EHSMS Volume III, *Operations Manual*, Procedure P-15, *Installation of Wellfield Pipelines*. The Maintenance Superintendent reviewed these items and stated that all had been completed and the appropriate controls were in place. A copy of the testing sheets is attached to this SERP Evaluation.

## **Environmental Assessment**

The SERP reviewed the contents of the Environmental Assessment (EA) prepared by NRC in February 1998 to determine whether the proposed change could cause substantive safety or environmental impacts.

Well construction and testing as described in the EA has been completed for the wells associated with Wellhouses 51, 48 and 23.

Section 3.3.1 discusses leak testing of wellfield piping. The SERP reviewed the completion of pressure testing for piping systems associated with Wellhouses 51, 48 and 23 and found that they meet the intent of the EA.

## **Financial Surety**

The proposed change is covered in the NRC-approved financial surety maintained by CBR and approved by Amendment 23 to SUA-1534 in the amount of \$25,207,672.

## **Safety Evaluation Report**

The Safety Evaluation Report (SER) principally provides the basis for worker safety at Crow Butte and does not specifically address the issues related to approval of startup of new wells.

## **Technical Evaluation Reports**

The SERP reviewed the Technical Evaluation Reports (TERs) prepared by NRC staff to support amendments made to SUA-1534 since renewal in 1998. None of the TERs prepared since license renewal directly address issues related to approval of new wells for operation.

**CAMECO RESOURCES  
CROW BUTTE OPERATION**



**SERP 09-04**

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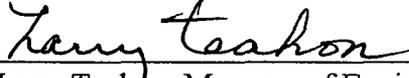
**Degradation of Essential Safety or Environmental Commitment**

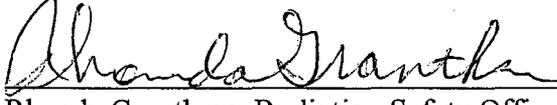
SUA-1534 allows CBR to make changes as long as they do not degrade the essential safety or environmental commitments made in the application. The SERP determined that safety commitments made in the LRA and discussed in the EA have been met and that startup of these wells will not degrade the safety and environmental commitments.

Based upon this evaluation of the licensing basis, the CBR SERP hereby approves startup and operation the replacement well in Wellhouse 51, one new well in Wellhouse 48, and three new wells in Wellhouse 23.

Approved this 9th day of July, 2009.

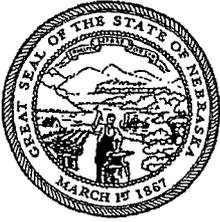
 7-13-09  
\_\_\_\_\_  
Doug Pavlick, Operations Manager  
SERP Chairman

 7/9/09  
\_\_\_\_\_  
Larry Teahon, Manager of Environmental, Health and Safety  
SERP Secretary

 7/13/09  
\_\_\_\_\_  
Rhonda Grantham, Radiation Safety Officer

 7/9/2009  
\_\_\_\_\_  
Bob Tiensvold, Maintenance Superintendent

 7-9-09  
\_\_\_\_\_  
Wade Beins, Senior Geologist



Dave Heineman  
Governor

103412  
NE0122411  
MU 10 P  
STATE OF NEBRASKA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Michael J. Linder

Director

Suite 400, The Atrium

1200 'N' Street

P.O. Box 98922

Lincoln, Nebraska 68509-8922

Phone (402) 471-2186

FAX (402) 471-2909

website: www.deq.state.ne.us

NOV 19 2008

Mr. Steve Collings  
Crow Butte Resources, Inc.  
141 Union Boulevard, Suite 330  
Lakewood, Colorado 80228

Dear Mr. Collings:

On November 13, 2008 the Nebraska Department of Environmental Quality received a submittal of information from Crow Butte Resources, Inc. The submittal serves as a Notice of Intent to Operate and contains a Well Completion Report and a Casing Integrity Test Report for the recently installed well (5319A) in Mine Unit 10, Well House 51.

The Department has reviewed the information submitted and determined that it is adequate and complete. Upper Control Limits and Restoration Values established for Mine Unit 10 have already been submitted and approved. Approval of the additional well in Well House 51 of Mine Unit 10 will not alter those values. The Department hereby approves the Notice of Intent to Operate the additional well in Mine Unit 10.

If you have any questions concerning this matter, please contact Jennifer Abrahamson of my staff at (402) 471-4290.

Sincerely,

Michael J. Linder  
Director

ML/jla

word/CBR/letter/NOI\_MU10\_WH51\_5319A.doc

Cc: Dave Carlson, NDEQ  
Jim Stokey, CBR





HH 51

Item #	Well #	Initialed by	Comments
39	I 5319	JT	new #2 Plug
40	I 5322	JT	OK
41	I 5323	JT	OK
42	I 5324	JT	OK
43	I 5328	JT	OK
44	I 5329	JT	OK
45	I 5331	JT	OK
46	I 5332	JT	OK
47	I 5333	JT	OK
48	I 5358	JT	Needs slipper + hard
49	I 5391		Not in two house
50	I 5392	JT	OK

7/9/09  
Installed  
& hooked up  
BT

Well House Pressure Check Verification

Pressure check for Well House 51

Date: 5-5-08

**Injection:**

On 5-1-08 the injection lines and 2" laterals were pressured to 120 psi. This was done using a centrifugal pump and potable water. The time interval was as follows:

Start: 120 psi at \_\_\_\_\_ AM/PM  
Stop: 119 psi at \_\_\_\_\_ AM/PM *25 minutes*

The section of trunk line checked was from valve station 12-1 to the well field in

~~12-51~~ 11-1 AND ALL OF UH 51

**Production:**

On 5-1-08 the production trunk lines and 2" laterals were pressured to 125 psi. This was done using a centrifugal pump and potable water. The pressure and time interval was as follows:

Start: 125 psi at \_\_\_\_\_ AM/PM  
Stop: 121 psi at \_\_\_\_\_ AM/PM *25 minutes*

The section of trunk line was from valve station 12-1 to the well field in

~~12-51~~ 11-1 ALL OF UH 51

**Oxygen:**

On 5-2-08 the oxygen line was pressured to 125 psi. The pressure and time interval was as follows:

Start: 125 psi at 09:00 AM/PM  
Stop: 125 psi at 09:30 AM/PM

The section of trunk line checked was from valve station UH49 to the well field in

UH 51 MU 10

*Kurt Mc Dowell*  
Well Field Construction Foreman



Dave Heineman  
Governor

## STATE OF NEBRASKA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Michael J. Linder

Director

Suite 400, The Atrium

1200 'N' Street

P.O. Box 98922

Lincoln, Nebraska 68509-8922

Phone (402) 471-2186

FAX (402) 471-2909

website: [www.deq.state.ne.us](http://www.deq.state.ne.us)

OCT 21 2008

Mr. Steve Collings  
Crow Butte Resources, Inc.  
141 Union Boulevard, Suite 330  
Lakewood, Colorado 80228

RECEIVED  
OCT 23 2008  
CROW BUTTE RESOURCES, INC.  
LAKWOOD, COLO.

Dear Mr. Collings:

On October 6, 2008 the Nebraska Department of Environmental Quality received a submittal of information from Crow Butte Resources, Inc. The submittal serves as a Notice of Intent to Operate and contains a Well Completion Report and a Casing Integrity Test Report for the recently installed well (5640) in Mine Unit 10, Well House 48.

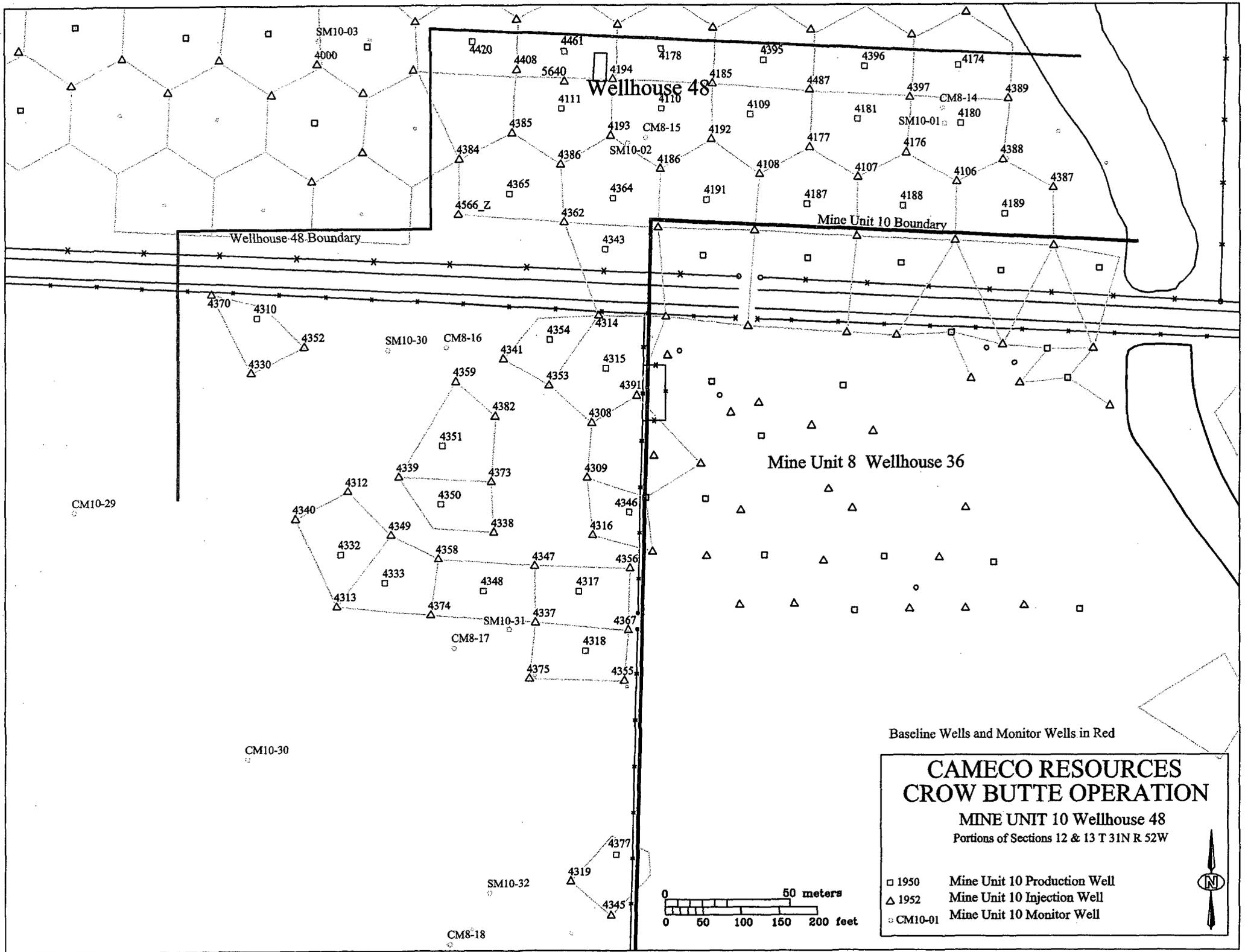
The Department has reviewed the information submitted and determined that it is adequate and complete. Upper Control Limits and Restoration Values established for Mine Unit 10 have already been submitted and approved. Approval of the additional well in Well House 48 of Mine Unit 10 will not alter those values. The Department hereby approves the Notice of Intent to Operate the additional well in Mine Unit 10.

If you have any questions concerning this matter, please contact Jennifer Abrahamson of my staff at (402) 471-4290.

Sincerely,

Michael J. Linder  
Director

ML/jla  
word/CBR/letter/NOI\_MU10\_WH48\_5640  
Cc: Dave Carlson, NDEQ  
Jim Stukay, CBR



Wellhouse 48

Mine Unit 10 Boundary

Wellhouse 48 Boundary

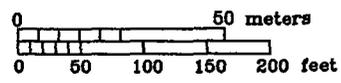
Mine Unit 8 Wellhouse 36

Baseline Wells and Monitor Wells in Red

**CAMECO RESOURCES  
CROW BUTTE OPERATION**

MINE UNIT 10 Wellhouse 48  
Portions of Sections 12 & 13 T 31N R 52W

- 1950 Mine Unit 10 Production Well
- △ 1952 Mine Unit 10 Injection Well
- CM10-01 Mine Unit 10 Monitor Well



**Crow Butte Resources**

Final Inspection of Piping Wellhead to Plant

Wellhouse: 48

Review of Pressure Test Data Complete: 7-9-09

Item #	Well #	Initialed by	Comments
1	P 5640	CE	
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			

Date: 7/9/2009

Mine Manager: [Signature] 7-9-09

W.F.C. Foreman: [Signature] - WK SUPER

Non-Service Lines Locked-Out: N/A

Item #	Well #	Initialed by	Comments
20			
21			
22			
23			
24			
25			
26			
27			
28			
29			
30			

Well House Pressure Check Verification

Pressure check for Well House 48

Date: 7-9-09

Injection  Production

On IS640 the 2" laterals were pressured to 86 psi. This was done using injection manifold pressure and injection water. The time interval was as follows:

Start: 86 psi at 1250 AM  
Stop: 81 psi at 1300 PM

[Signature]  
Wellfield Operator performing test

7-9-09  
Date

Injection  Production

On \_\_\_\_\_ the 2" laterals were pressured to \_\_\_\_\_ psi. This was done using injection manifold pressure and injection water. The time interval was as follows:

Start: \_\_\_\_\_ psi at \_\_\_\_\_ AM/PM  
Stop: \_\_\_\_\_ psi at \_\_\_\_\_ AM/PM

\_\_\_\_\_  
Wellfield Operator performing test

\_\_\_\_\_  
Date

Injection  Production

On \_\_\_\_\_ the 2" laterals were pressured to \_\_\_\_\_ psi. This was done using injection manifold pressure and injection water. The time interval was as follows:

Start: \_\_\_\_\_ psi at \_\_\_\_\_ AM/PM  
Stop: \_\_\_\_\_ psi at \_\_\_\_\_ AM/PM

\_\_\_\_\_  
Wellfield Operator performing test

\_\_\_\_\_  
Date

Injection  Production

On \_\_\_\_\_ the 2" laterals were pressured to \_\_\_\_\_ psi. This was done using injection manifold pressure and injection water. The time interval was as follows:

Start: \_\_\_\_\_ psi at \_\_\_\_\_ AM/PM  
Stop: \_\_\_\_\_ psi at \_\_\_\_\_ AM/PM

\_\_\_\_\_  
Wellfield Operator performing test

\_\_\_\_\_  
Date



Dave Heineman  
Governor

# STATE OF NEBRASKA

DEPARTMENT OF ENVIRONMENTAL QUALITY

**Michael J. Linder**

Director

Suite 400, The Atrium  
1200 N. Street  
P.O. Box 98922  
Lincoln, Nebraska 68509-8922  
Phone (402) 471-2186  
FAX (402) 471-2909  
website: [www.deq.state.ne.us](http://www.deq.state.ne.us)

NOV 14 2008

Mr. Steve Collings  
Crow Butte Resources, Inc.  
141 Union Boulevard, Suite 330  
Lakewood, Colorado 80228

Dear Mr. Collings:

On November 7, 2008 the Nebraska Department of Environmental Quality received a submittal of information from Crow Butte Resources, Inc. The submittal serves as a Notice of Intent to Operate and contains a Well Completion Report and a Casing Integrity Test Report for three recently installed wells (1921, 1922, and 1923) in Mine Unit 6, Well House 23.

The Department has reviewed the information submitted and determined that it is adequate and complete. Upper Control Limits and Restoration Values established for Mine Unit 6 were submitted on January 23, 1998 and approved. Approval of the additional wells in Well House 23 of Mine Unit 6 will not alter those values. The Department hereby approves the Notice of Intent to Operate the three additional wells in Mine Unit 6, Well House 23.

If you have any questions concerning this matter, please contact Jennifer Abrahamson of my staff at (402) 471-4290.

Sincerely,

Michael J. Linder

Director

ML/jla

word/CBR/letter/NOI\_MU6\_WH23wells.doc

Cc: Dave Carlson, NDEQ

Jim Stokey, CBR



# Crow Butte Resources

Final Inspection of Piping Wellhead to Plant

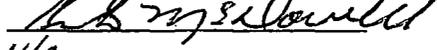
Wellhouse: 23

Review of Pressure Test Data Complete:



Date: 7-9-09

Mine Manager: 

W.F.C. Foreman: 

Non-Service Lines Locked-Out: N/A

Item #	Well #	Initialed by	Comments
1	I 1921		OK
2	I 1922		OK
3	I 1923		OK
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			

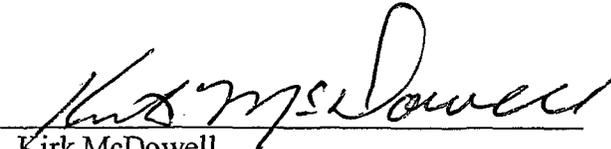
Item #	Well #	Initialed by	Comments
20			
21			
22			
23			
24			
25			
26			
27			
28			
29			
30			

On June 29, 2009, three new wells in WH23 were pressure-checked to 100 psi.

1921  
Start 100 psi 5 minutes  
End 98 psi

1922  
Start 100 psi 5 minutes  
End 97 psi

1923  
Start 100 psi 5 minutes  
End 98 psi

  
Kirk McDowell  
June 29, 2009



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**SERP 09-05 Evaluation**

**CAMECO RESOURCES  
CROW BUTTE OPERATION**



**SERP 09-05**

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**Crow Butte Resources, Inc.**

**Safety and Environmental Review Panel**

**Evaluation Report – SERP 09-05**

**Approval to Operate Replacement Well 3979A in Wellhouse 47**

**July 23, 2009**

The Crow Butte Resources, Inc. (CBR) Safety and Environmental Review Panel (SERP) met to review and approve in Mine Unit 9 the replacement of a well in Wellhouse 47.

The SERP appointed for this evaluation consisted of the following members:

<u>Name</u>	<u>Title</u>	<u>Area of Expertise</u>
Jim Stokey	General Manager	Management
Doug Pavlick	Operations Manager	Operations
Larry Teahon	Manager of Health, Safety, and Environmental Affairs	Safety
Rhonda Grantham	Radiation Safety Officer	Radiation Safety
Bob Tiensvold	Maintenance Superintendent	Construction
Wade Beins	Senior Geologist	Well Construction

Mr. Stokey is the SERP Chairman. Mr. Teahon was appointed SERP Secretary for this evaluation.

**Purpose of SERP Evaluation**

The purpose of this evaluation by the CBR SERP was to review and approve the operation of replacement well 3979A in Wellhouse 47 in Mine Unit 9.

# CAMECO RESOURCES CROW BUTTE OPERATION



## SERP 09-05

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License Condition 9.4 allows CBR to make changes in the facility or procedures or conduct tests or experiments that are not presented in the approved application if such changes do not:

- i. Result in any appreciable increase in the frequency of occurrence of an accident previously evaluated in the license application (as updated);
- ii. Result in any appreciable increase in the likelihood of occurrence of a malfunction of a structure, system, or component (SSC) important to safety previously evaluated in the license application (as updated);
- iii. Result in any appreciable increase in the consequences of an accident previously evaluated in the license application (as updated);
- iv. Result in any appreciable increase in the consequences of a malfunction of an SSC previously evaluated in the license application (as updated);
- v. Create a possibility for an accident of a different type that any previously evaluated in the license application (as updated);
- vi. Create a possibility for a malfunction of an SSC with a different result than previously evaluated in the license application (as updated);
- vii. Result in a departure from the method of evaluation described in the license application (as updated) used in establishing the final safety evaluation report (FSER) or the environmental assessment (EA) or the technical evaluation reports (TERs) or other analysis and evaluations for license amendments.
- viii. For the purposes of SERP evaluations, SSC means any SSC which has been referenced in a staff SER, TER, EA, or environmental impact statement (EIS) and supplements and amendments.

The SERP evaluation was conducted in accordance with the instructions contained in the Environmental, Health, and Safety Management System (EHSMS) Volume II, *Management Procedures*, EHS-6, *Managing Change*. The SERP reviewed the licensing requirements, including the following documents:

- Title 10, Code of Federal Regulations;
- Source Materials License SUA-1534, Amendment No. 23 dated May 12, 2008;
- *Application for Renewal of USNRC Radioactive Source Materials License SUA-1534*, Crow Butte Resources, Inc. December 1995;
- *Environmental Assessment for Renewal of Source Materials License No. SUA-1534*, USNRC February 1998;
- *Safety Evaluation Report for Renewal of Source Materials License No. SUA-1534*, USNRC February 1998;
- Technical Evaluation Reports issued in support of amendments to SUA-1534.

# CAMECO RESOURCES CROW BUTTE OPERATION



SERP 09-05

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## Title 10 Code of Federal Regulations

The proposed change will have no impact on CBR's ability to meet all applicable NRC regulations.

## Source Materials License SUA-1534 Requirements

Amendment 23 to SUA-1534 dated May 12, 2008 was reviewed for specific requirements related to approval and operation of additional wells.

Mine Unit 9 was previously approved by SERP 03-05 dated October 22, 2003. Therefore, no review of monitor well location, installation or baseline sampling and Upper Control Limit determination is required for this approval. The start up of Wellhouse 47 was approved by SERP 06-06 dated December 1, 2006.

License Condition 10.2: This License Condition requires that CBR construct all wells in accordance with the methods contained in the Section 3.1.2 of the approved License Renewal Application (LRA). License Condition 10.2 also requires that CBR perform mechanical integrity tests (MIT) for all injection and production wells.

The well construction methods in use for Wellhouse 47 are the same as those described in the LRA and contained in EHSMS Volume III, *Operations Manual*, Procedure P-25, *Well Installation*. MITs were performed in accordance with EHSMS Volume III, *Operations Manual*, Procedure P-23, *Mechanical Integrity Test (MIT)*. The MIT data sheet was provided by the Senior Geologist and reviewed by the SERP. The records indicate that the MIT performed on well 3979A in Wellhouses 47 met the requirements.

License Condition 9.3: This License Condition requires that CBR conduct operations in accordance with the representations contained in the LRA. Section 3.1.3 of the LRA discusses construction materials, instrumentation, and monitoring requirements. Section 3.3 also discusses instrumentation, including wellhouse injection and production instrumentation and wet building alarms for wellhouses. Section 7.2.3 of the LRA requires that leak tests be performed on all wellfield piping before placing the system into production operations.

The SERP reviewed the Final Inspection of Piping Wellhead to Plant and Pressure Testing sheets. These checklists were developed by the Wellfield Construction staff to document completion of all required actions before initiating operations of this well. Some of these actions are required by regulatory and licensing requirements, while some were developed over the course of mining experience at Crow Butte. Construction activities are governed by EHSMS Volume III, *Operations Manual*, Procedure P-15,

**CAMECO RESOURCES  
CROW BUTTE OPERATION**



**SERP 09-05**

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*Installation of Wellfield Pipelines.* The Maintenance Superintendent reviewed these items and stated that all had been completed and the appropriate controls were in place. A copy of the testing sheets is attached to this SERP Evaluation.

**Environmental Assessment**

The SERP reviewed the contents of the Environmental Assessment (EA) prepared by NRC in February 1998 to determine whether the proposed change could cause substantive safety or environmental impacts.

Well construction and testing as described in the EA has been completed for this well.

Section 3.3.1 discusses leak testing of wellfield piping. The SERP reviewed the completion of pressure testing for piping systems associated with Wellhouse 47 and found that they meet the intent of the EA.

**Financial Surety**

The proposed change is covered in the NRC-approved financial surety maintained by CBR and approved by Amendment 23 to SUA-1534 in the amount of \$25,207,672.

**Safety Evaluation Report**

The Safety Evaluation Report (SER) principally provides the basis for worker safety at Crow Butte and does not specifically address the issues related to approval of startup of new wells.

**Technical Evaluation Reports**

The SERP reviewed the Technical Evaluation Reports (TERs) prepared by NRC staff to support amendments made to SUA-1534 since renewal in 1998. None of the TERs prepared since license renewal directly address issues related to approval of new wells for operation.

**Degradation of Essential Safety or Environmental Commitment**

SUA-1534 allows CBR to make changes as long as they do not degrade the essential safety or environmental commitments made in the application. The SERP determined that safety commitments made in the LRA and discussed in the EA have been met and that startup of this well will not degrade the safety and environmental commitments.

**CAMECO RESOURCES  
CROW BUTTE OPERATION**



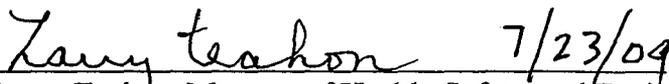
**SERP 09-05**

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Based upon this evaluation of the licensing basis, the CBR SERP hereby approves startup and operation the replacement well in Wellhouse 47.

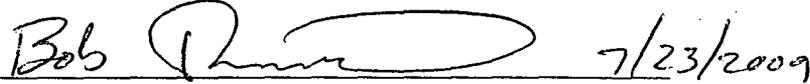
Approved this 23rd day of July, 2009.

  
Jim Stokey, General Manager  
SERP Chairman

  
Larry Teahon, Manager of Health, Safety, and Environmental Affairs  
SERP Secretary

  
Doug Pavlick, Operations Manager

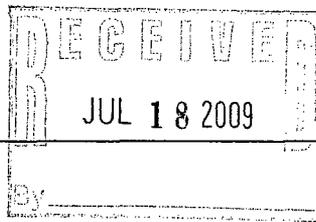
  
Rhonda Grantham, Radiation Safety Officer

  
Bob Tiensvold, Maintenance Superintendent

  
Wade Beins, Senior Geologist



Dave Heineman  
Governor



# STATE OF NEBRASKA

DEPARTMENT OF ENVIRONMENTAL QUALITY

**Michael J. Linder**

Director

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website: [www.deq.state.ne.us](http://www.deq.state.ne.us)

JUL 16 2009

Mr. Steve Collings  
Crow Butte Resources, Inc.  
141 Union Boulevard, Suite 330  
Lakewood, Colorado 80228

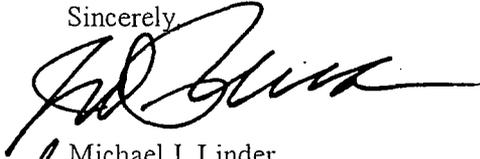
Dear Mr. Collings:

On July 13, 2009 the Nebraska Department of Environmental Quality received a submittal of information from Crow Butte Resources, Inc. The submittal serves as a Notice of Intent to Operate and contains a Well Completion Report and a Casing Integrity Test Report for the recently installed well (3979A) in Mine Unit 9, Well House 47.

The Department has reviewed the information submitted and determined that it is adequate and complete. Upper Control Limits and Restoration Values established for Mine Unit 9 have already been submitted and approved. Approval of the additional well in Well House 47 of Mine Unit 9 will not alter those values. The Department hereby approves the Notice of Intent to Operate the additional well in Mine Unit 9.

If you have any questions concerning this matter, please contact Jennifer Abrahamson of my staff at (402) 471-4290.

Sincerely,

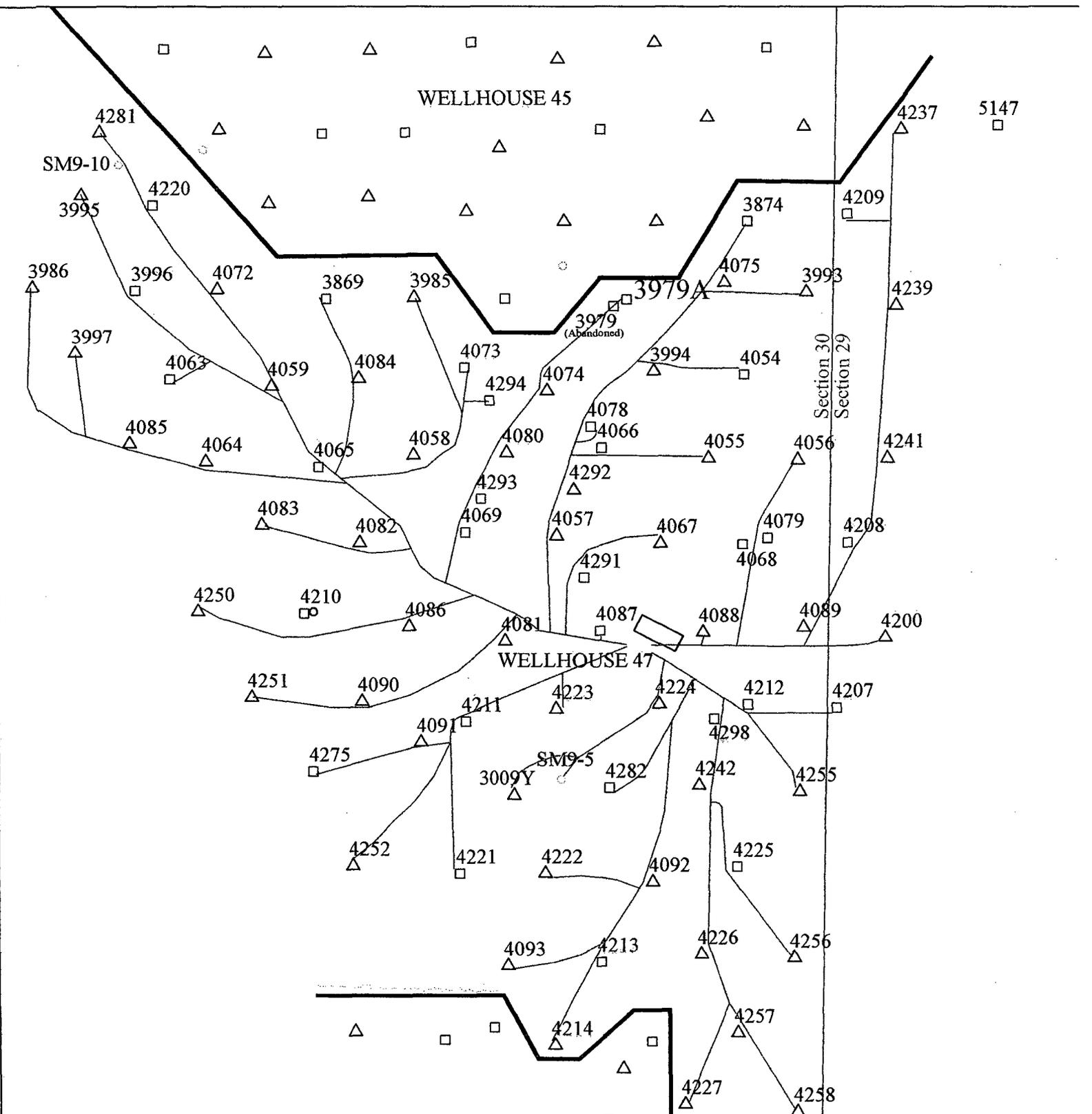


Michael J. Linder  
Director

ML/jla

word/CBR/letter/NOI\_MU9\_WH47\_3979A.doc

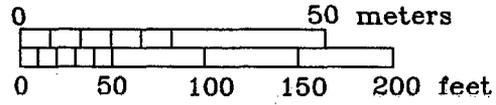
Cc: Dave Carlson, NDEQ  
Jim Stokey, CBR



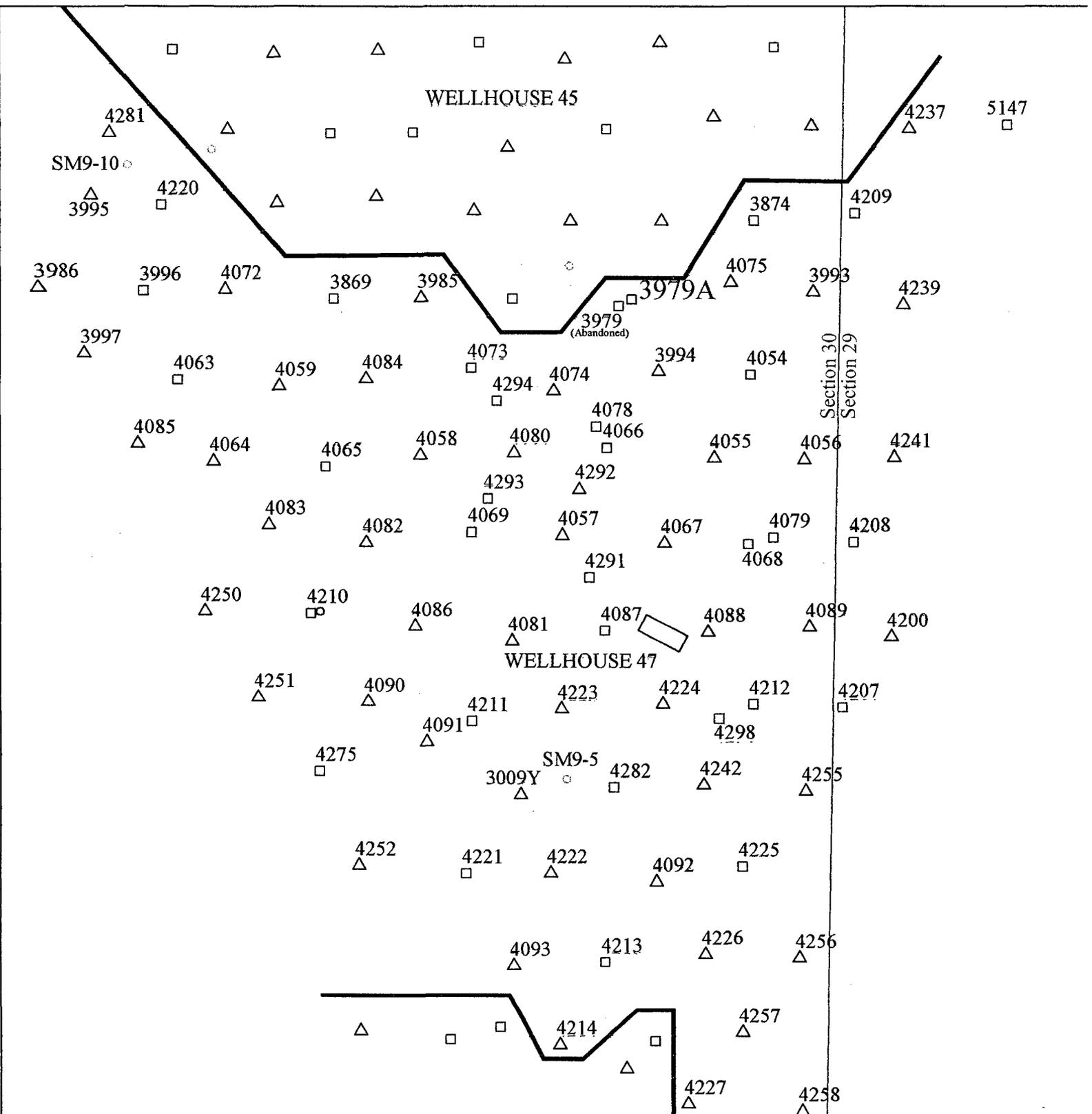
# CROW BUTTE PROJECT

MINE UNIT 9 WELLHOUSE 47  
 SEC 29 & 30 T31N R 51W

- 4213     Production Well
- Injection Well
- △       Monitor Well
- Monitor Well



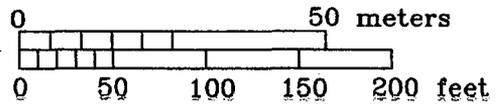
WELLHOUSE 47A



# CROW BUTTE PROJECT

MINE UNIT 9 WELLHOUSE 47  
 SEC 29 & 30 T31N R 51W

- 4213      Production Well
- Injection Well
- △      Monitor Well
- SM9-5



WELLHOUSE 47A



Nebraska Department  
of Environmental Quality

# Casing Integrity Test Report

Company: CBR Permit No: NE0122611  
 Project: Crow Butte Well No: 3979A  
 Casing Type: Whiteware Diameter: 4.5  
 Hole Depth: 740' Casing Depth: 719'  
 Screened Interval(s): 684'-712'  
 Depth to K-packer: 672 Depth to Test Packer(s) Top ground level  
Bottom ~~663~~ 663  
 Comments: Work Over

TIME	ELAPSED TIME (Min)	PRESSURE (PSIG)
1:00	0	125
1:05	5	122
1:10	10	119
1:15	15	116
1:20	20	114

Test Performed By: Justin Didier  
 Date: 7-9-09  
 Calibration Performed By: JD  
 Date: 7-6-09

## CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on inquiry of those individuals immediately responsible for obtaining information, I believe the information is true, accurate, and complete. Further, I certify awareness that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment.

By Wade Beins Senior Geologist  
 PRINTED NAME OF PERSON SIGNING TITLE  
 By Wade Beins 7-10-09  
 SIGNATURE DATE

Well House Start-Up Checklist

Well House # 47

Item	Description	Person	Comments	Date Completed	Initial
1	Permit To Operate	Brost / Pile / Stokey		9/11/06	WB
2	Complete Pressure Testing (Trunkline and House)	McDowell / Pile / Stokey		9.5.06	KS
3	Pipelines checked for leaks	McDowell / Pile / Stokey		9.5.06	KS
4	Pipelines buried	McDowell / Pile / Stokey		10-26-06	KS
5	Pressure gauge on injection manifold	R. Roberts / Pile / Stokey		11/30	BT
6	Injection lines equipped with totalizing flow meters	R. Roberts / Pile / Stokey		11/29	BT
7	Injection and Production total flows can be measured	H. Douthit / Pile / Stokey		11/29	BT
8	Unused trunkline locked out by two separate means	McDowell / Pile / Stokey		9.5.06	KS
9	Isolation valves are closed and chained	McDowell / Pile / Stokey		9.5.06	KS
10	Map of 2" lines in house	McDowell/Beins / Pile / Stokey		11-29-06	WB
11	Well-field Layout map in house	McDowell/Beins / Pile / Stokey		10.26.06	KS
12	Check berms	Griffin / Pile / Stokey		12/1/06	JK
13	Pressure check oxygen lines	McDowell / Pile / Stokey		11/30/06	KS
14	Continuity check on producers	B. Tiensvold / Pile / Stokey		9/19/06	BT
15	Ground fault check	REA/B. Tiensvold / Pile / Stokey		11/30	BT
16	Communications wire check	B. Tiensvold / Pile / Stokey		11/29	BT
17	Heater size check	B. Tiensvold / Pile / Stokey		11/29	BT
18	Processor installed well house	Pile / Stokey		11/28	BT
19	UPS installed and operational	B. Pile/B. Tiensvold / Pile / Stokey		11/28	BT
20	Wet house alarm installed	B. Tiensvold / Pile / Stokey		11/29	BT
21	Wet house alarm checked	P. Dunn/J. Douthit / Pile / Stokey		11/30	BT
22	Oxygen solenoid checked	P. Dunn/J. Douthit / Pile / Stokey		11/30	BT
23	Check fuses in control panel	B. Tiensvold / Pile / Stokey		11/29	BT
24	Program MMI	Pile / Stokey		11/28	BT
25	Program PLC	Pile / Stokey		11/28	BT
26	Switch on for alarming	P. Dunn/J. Douthit / Pile / Stokey		11-27	JD.
27	Set Scalar Card 'K' Factors	P. Dunn/J. Douthit / Pile / Stokey		11-27	JD.
28	Fire extinguisher w/placard	McDowell / Pile / Stokey	N/A	9.5.06	KS
29	Off tags and lockouts	B. Tiensvold/Dunn/J.Douthit / Pile / Stokey		12-1	JD
30	Contaminated and uncontaminated cans	P. Dunn/J. Douthit / Pile / Stokey		12-1	JD.
31	Complete 2" lateral inspection	McDowell / Pile / Stokey		10-26-06	KS
32	Visually inspect entire system to plant	McDowell / Pile / Stokey		10-26-06	KS
33	Labels on Monitor Wells	McDowell / Pile / Stokey		9.5.06	KS
34	Valve Station Covers and Stairs Built	R. Roberts / Pile / Stokey		11-30	RR
35					
36					
37					



Item #	Well #	Initialed by	Comments
1	I 13009	K7	OK
2	I 13985	K7	OK
3	I 13986	K7	OK
4	I 13993	K7	OK
5	I 13994	K7	OK
6	I 13995	K7	OK
7	I 13997	K7	OK
8	I 14055	K7	OK Flood's NEW GUARD
9	I 14056	K7	OK
10	I 14057	K7	OK
11	I 14058	K7	OK
12	I 14059	K7	OK
13	I 14064	K7	OK
14	I 14067	K7	OK
15	I 14072	K7	OK
16	I 14074	K7	OK
17	I 14075	K7	OK
18	I 14080	K7	OK
19	I 14081	K7	OK

Item #	Well #	Initialed by	Comments
20	I 14082	K7	OK
21	I 14083	K7	OK
22	I 14084	K7	OK
23	I 14085	K7	OK
24	I 14086	K7	OK
25	I 14088	K7	OK
26	I 14089	K7	OK
27	I 14090	K7	OK
28	I 14091	K7	OK
29	I 14092	K7	OK
30	I 14093	K7	OK
31	I 14200	K7	OK
32	I 14214	K7	OK
33	I 14222	K7	OK
34	I 14223	K7	OK
35	I 14224	K7	OK
36	I 14226	K7	OK
37	I 14227	K7	OK
38	I 14237	K7	OK





**CROW BUTTE RESOURCES, INC.**

86 Crow Butte Road

P. O. Box 169

Crawford, Nebraska 69339-0169

(308) 665-2215

(308) 665-2341 - FAX

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GROUND RESISTANCE TEST RECORD

TEST SET USED: AEMC Model 3711 Ground Resistance Tester

GROUND TEST RESULTS: Wellhouse 47 OHMS: .7, 107, 20.6 = .67 OHMS

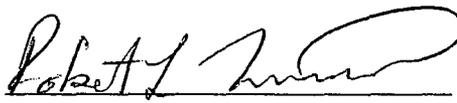
CONCLUSIONS:

$$R_T = 1 / \left( \frac{1}{.7} + \frac{1}{107} + \frac{1}{20.6} \right)$$

THE TEST RESULTS ARE SATISFACTORY

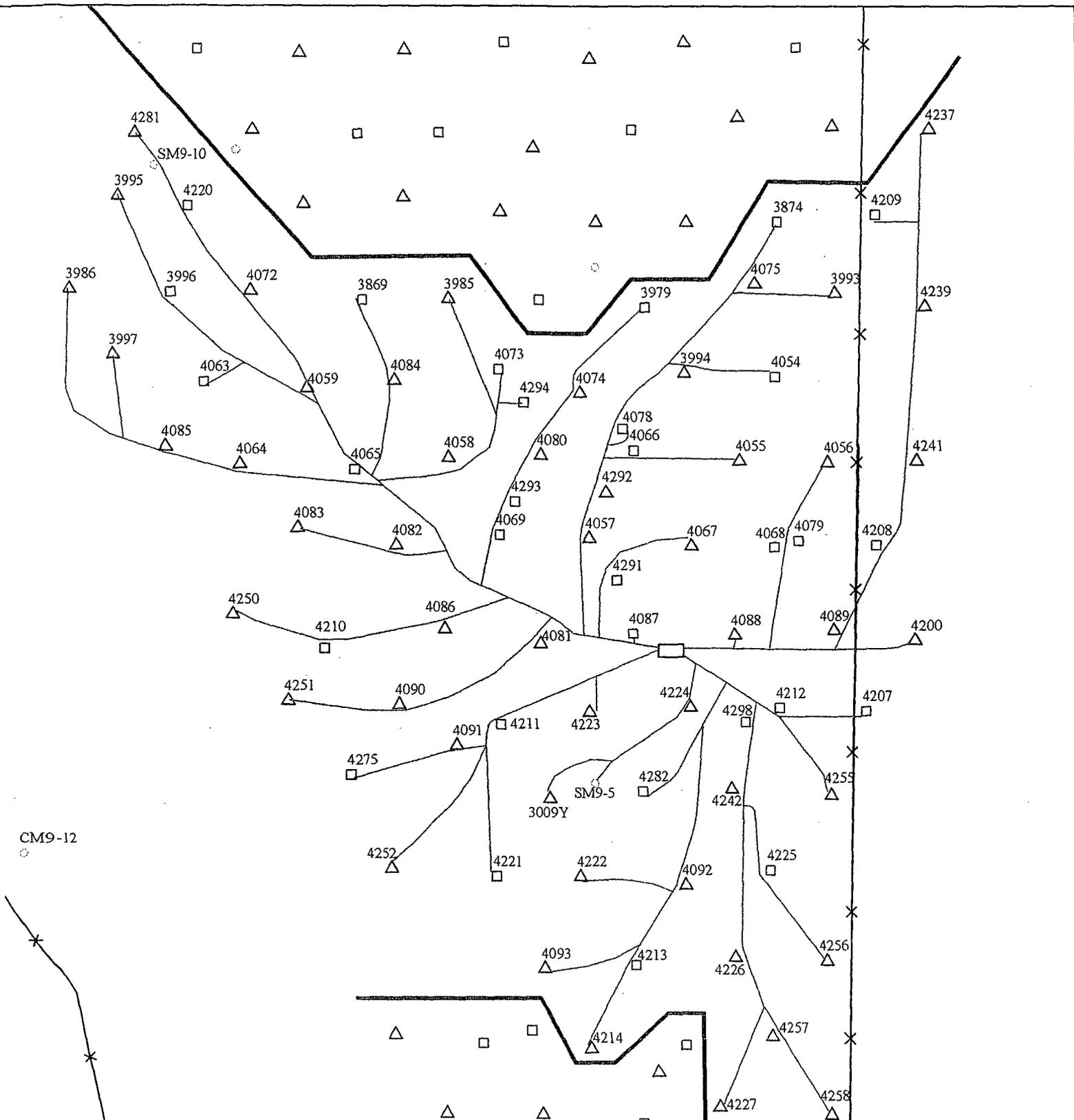
TEST PERFORMED BY:

CROW BUTTE RESOURCES, INC.

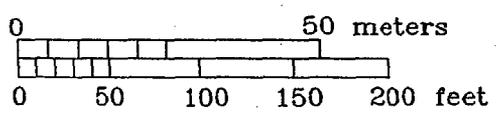


Robert Tiensvold

Date: December 1, 2006



**CROW BUTTE PROJECT**  
 MINE UNIT 9 WELLHOUSE 47  
 SEC 30 T31N R 51W



Well House Pressure Check Verification

Pressure check for Well House 47

Date: 9-5-06

Injection:

On 8-25-06 the injection lines and 2" laterals were pressured to 100 psi. This was done using a centrifugal pump and potable water. The time interval was as follows:

Start: 100 psi at ~~AM/PM~~ 30 minutes  
Stop: 97 psi at ~~AM/PM~~

The section of trunk line checked was from valve station 30-7 to the well field in

WH 47  
AK

Production:

On 8-28-06 the production trunk lines and 2" laterals were pressured to 100 psi. This was done using a centrifugal pump and potable water. The pressure and time interval was as follows:

Start: 100 psi at ~~AM/PM~~ 30 minutes  
Stop: 98 psi at ~~AM/PM~~

The section of trunk line was from valve station 30-7 to the well field in

WH 47  
AK

Oxygen:

On 10-15-06 the oxygen line was pressured to 125 psi. The pressure and time interval was as follows:

Start: 125 psi at 9:00 AM PM  
Stop: 125 psi at 11:00 AM PM  
From WH# 45 to WH# 47 RR

The section of trunk line checked was from valve station \_\_\_\_\_ to the well field in

[Signature]  
Well Field Construction Foreman



Task Complete  
Ready for Service

# Crow Butte Operation

## Pulling Unit Work Order

WH # 47 Date: 7-22-09 Work Order # 2009-2613  
Well # P3979A Operator(s): DH FH Work Completed: 7 122 120 09

Wet End # 18-23

New	Used
<input type="checkbox"/>	<input checked="" type="checkbox"/>

 Top of Screen: \_\_\_\_\_ Ft.  
Motor Hp: 3 Hp 

New	Used
<input checked="" type="checkbox"/>	<input type="checkbox"/>

 Sleeve Location / Length: \_\_\_\_\_ Ft.  
Volts: 480 v Phase: 3  $\phi$  Stinger / Motor Depth: 660 poly Ft.  
Ground Continuity: To House 2.6 Ohms Wire Reel 1.3 Ohms Meter Leads .2 Ohms

Pull for MIT:	<input type="checkbox"/>	Pull for Swab:	<input type="checkbox"/>	Upgrade/Restart:	<input type="checkbox"/>
Install after MIT:	<input type="checkbox"/>	Swab:	<input type="checkbox"/>	New Installation:	<input checked="" type="checkbox"/>
Maintenance:	<input type="checkbox"/>	Install after Swab:	<input type="checkbox"/>	Pressure Check:	<input type="checkbox"/>

Wellhead Inspected:	<input checked="" type="checkbox"/>	Lateral Inspected:	<input checked="" type="checkbox"/>	Control Room Notified:	<input type="checkbox"/>
Bleed Valve Checked:	<input checked="" type="checkbox"/>	Tagged Out:	<input checked="" type="checkbox"/>	Limits Are Set:	<input type="checkbox"/>
Splines:	<input checked="" type="checkbox"/>	Lock Out Installed:	<input checked="" type="checkbox"/>	Added to Night List:	<input type="checkbox"/>
Meter Run Inspected:	<input checked="" type="checkbox"/>	Lock Out Removed:	<input checked="" type="checkbox"/>		

Description of Work Needed: put new poly in and wire

Additional Information: Butt welded lateral over from old well to new well, changed to victalic cases the wire over to new well.

This Work is Complete:

Signed: David Humm



2.2.3.2 The small diameter HDPE pipes may be pressure checked using a pressure-checking manifold or they may be pressure checked along with the large diameter trunkline piping. When pressure checking the small HDPE lines separately, install a pressure-checking unit and fill each line with water. Pressure each line to 100 psig or in some cases depending on the location, pressure each line to 125 psig and record the date, the length of time pressure is applied and the starting pressure.

*DANGER: Never pressurize PVC pipe with compressed air.*

2.2.3.3 When the lines have been pressurized for at least 5 minutes, check the pressure. If there is a pressure loss of 10 percent or more, check the line for leaks and repair or replace the line as needed.

2.2.3.4 After the line has held pressure for at least 5 minutes without a loss of 10 percent of the starting pressure, record the ending pressure, the pressure loss (if any), and then initial the record. Any lines that do not pass the pressure test should be repaired or replaced and tested again. A record of the pressure test results will be kept on site.

2.2.3.5 To pressure check the small diameter HDPE along with the large diameter trunkline piping, see section 2.2.5.

2.2.3.6 Occasionally some amount of pipeline must be installed after the initial construction of the wellfield or wellhouse. This is generally in the form of smaller diameter HDPE pipe that may be added when wells are reversed or a new well is added to an existing wellhouse. In this situation, the line or lines will be placed into service, brought up to normal operating pressures and conditions, and then visually monitored for leaks. If required, the line may be back-filled once the visual observation is complete and has been documented.

#### 2.2.4 Pressure Testing Gorilla Hose

2.2.4.1 Gorilla Hose may be pressure checked using a pressure-checking manifold and/or they may be pressure checked along with the small diameter HDPE piping. When pressure checking gorilla hose separately, install a pressure-checking unit and fill each hose with water. Pressure each line to 115 psig.

# CROW BUTTE RESOURCES, INC.



MEMORANDUM

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**TO:** SERP File

**FROM:** Bob Tiensvold 

**DATE:** 7-24-2009

**SUBJECT:** P3979A – 47 visual pressure check

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In order to complete the SERP requirements for P3979A in HH 47, a visual pressure check was performed on the lateral piping at the well head when it was started at approximately 1430 hrs on 7/23/2009. All new piping was in a trench and exposed for inspection. The well was started by Pete Dunn and inspected by myself until it reached operating pressure and flow. It was then placed on the night well field operators' inspection list. At shift change this morning, I spoke to Lauren Yada, the night operator, and he stated that everything was inspected and that he had nothing to report.



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**SERP 09-06 Evaluation**



**Crow Butte Resources, Inc.**

**Safety and Environmental Review Panel**

**Evaluation Report – SERP 09-06**

**Wellhouse 52 Approval to Operate**

**October 2, 2009**

The Crow Butte Resources, Inc. (CBR) Safety and Environmental Review Panel (SERP) met to review and approve operation of Wellhouse 52 in Mine Unit 10 at the Crow Butte Uranium Project.

The SERP appointed for this evaluation consisted of the following members:

<u>Name</u>	<u>Title</u>	<u>Area of Expertise</u>
Jim Stokey	Mine Manager	Management
Larry Teahon	Manager of Health, Safety and Environmental Affairs	Environment
Doug Pavlick	Operations Manager	Operations
Rhonda Grantham	Radiation Safety Officer	Radiation Safety
Bob Tiensvold	Maintenance Superintendent	Construction
Wade Beins	Senior Geologist	Well Construction
Tate Hagman	Administrative Supervisor	Instrumentation

Dr. Stokey is the SERP Chairman. Mr. Teahon was appointed SERP Secretary for this evaluation.

**Purpose of SERP Evaluation**

# CAMECO RESOURCES CROW BUTTE OPERATION



## SERP 09-06

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The purpose of this evaluation by the CBR SERP was to review and approve Wellhouse 52 for operation.

License Condition 9.4 allows CBR to make changes in the facility or procedures or conduct tests or experiments that are not presented in the approved application if such changes do not:

- i. Result in any appreciable increase in the frequency of occurrence of an accident previously evaluated in the license application (as updated);
- ii. Result in any appreciable increase in the likelihood of occurrence of a malfunction of a structure, system, or component (SSC) important to safety previously evaluated in the license application (as updated);
- iii. Result in any appreciable increase in the consequences of an accident previously evaluated in the license application (as updated);
- iv. Result in any appreciable increase in the consequences of a malfunction of an SSC previously evaluated in the license application (as updated);
- v. Create a possibility for an accident of a different type than any previously evaluated in the license application (as updated);
- vi. Create a possibility for a malfunction of an SSC with a different result than previously evaluated in the license application (as updated);
- vii. Result in a departure from the method of evaluation described in the license application (as updated) used in establishing the final safety evaluation report (FSER) or the environmental assessment (EA) or the technical evaluation reports (TERs) or other analysis and evaluations for license amendments.
- viii. For the purposes of SERP evaluations, SSC means any SSC which has been referenced in a staff SER, TER, EA, or environmental impact statement (EIS) and supplements and amendments.

The SERP evaluation was conducted in accordance with the instructions contained in the Environmental, Health, and Safety Management System (EHSMS) Volume II, *Management Procedures*, EHS-6, *Managing Change*. The SERP reviewed the Wellhouse startup checklists and supporting documentation and evaluated this information as compared with the requirements of the licensing basis, including the following documents:

- Title 10, Code of Federal Regulations;
- Source Materials License SUA-1534, Amendment No. 23 dated May 12, 2008;
- *Application for Renewal of USNRC Radioactive Source Materials License SUA-1534*, Crow Butte Resources, Inc. December 1995;
- *Environmental Assessment for Renewal of Source Materials License No. SUA-1534*, USNRC February 1998;

**CAMECO RESOURCES  
CROW BUTTE OPERATION**



**SERP 09-06**

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- *Safety Evaluation Report for Renewal of Source Materials License No. SUA-1534*, USNRC February 1998;
- Technical Evaluation Reports issued in support of amendments to SUA-1534.

**Title 10 Code of Federal Regulations**

The proposed change will have no impact on CBR's ability to meet all applicable NRC regulations.

**Source Materials License SUA-1534 Requirements**

Amendment 23 to SUA-1534 dated May 12, 2008 was reviewed for specific requirements related to approval and operation of a wellhouse.

Mine Unit 10 was previously approved by a CBR SERP (see SERP 07-01 dated April 10, 2007). Therefore, no review of monitor well location, installation or baseline sampling and Upper Control Limit determination is required for approval of Wellhouse 52.

License Condition 10.2: This License Condition requires that CBR construct all wells in accordance with the methods contained in the Section 3.1.2 of the approved License Renewal Application (LRA). License Condition 10.2 also requires that CBR perform mechanical integrity tests (MIT) for all injection and production wells.

The well construction methods in use for Wellhouse 52 are the same as those described in the LRA and contained in EHSMS Volume III, *Operations Manual*, Procedure P-25, *Well Installation*. MITs were performed in accordance with EHSMS Volume III, *Operations Manual*, Procedure P-23, *Mechanical Integrity Test (MIT)*. All MIT data sheets were contained in the Notice of Intent to Operate Wellhouse 52 (or in the original Mine Unit 10 Notice of Intent) that was submitted to the NDEQ. These MIT data sheets were provided by the Senior Geologist and reviewed by the SERP. The records indicate that the MITs performed in Wellhouse 52 met the requirements.

License Condition 9.3: This License Condition requires that CBR conduct operations in accordance with the representations contained in the LRA. Section 3.1.3 of the LRA discusses construction materials, instrumentation, and monitoring requirements. Section 3.3 also discusses instrumentation, including wellhouse injection and production instrumentation and wet building alarms for wellhouses. Section 7.2.3 of the LRA requires that leak tests be performed on all wellfield piping before placing the system into production operations.

# CAMECO RESOURCES CROW BUTTE OPERATION



**SERP 09-06**

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The SERP reviewed the Wellhouse Start-up Checklist for Wellhouse 52. This checklist was developed by the Wellfield Construction staff to document completion of all required actions before initiating operations in a wellhouse. Some of these actions are required by regulatory and licensing requirements, while some were developed over the course of mining experience at Crow Butte. Construction activities are governed by EHSMS Volume III, *Operations Manual*, Procedure P-15, *Installation of Wellfield Pipelines*. The Maintenance Superintendent reviewed these items and stated that all had been completed and the appropriate controls were in place.

A copy of the Wellhouse Start-Up Checklist is attached to this SERP Evaluation. Supporting documentation in the form of pressure tests and ground continuity checks are also attached.

## **Environmental Assessment**

The SERP reviewed the contents of the Environmental Assessment (EA) prepared by NRC in February 1998 to determine whether the proposed change could cause substantive safety or environmental impacts.

Well construction and testing as described in the EA has been completed for the wells associated with Wellhouse 52.

Section 3.3.1 discusses leak testing of wellfield piping. The SERP reviewed the completion of pressure testing for piping systems associated with Wellhouse 52 and found that they meet the intent of the EA.

## **Financial Surety**

The proposed change is covered in the NRC-approved financial surety maintained by CBR and approved by Amendment 23 to SUA-1534 in the amount of \$25,207,672.

## **Safety Evaluation Report**

The Safety Evaluation Report (SER) principally provides the basis for worker safety at Crow Butte and does not specifically address the issues related to approval of Wellhouse 52.

## **Technical Evaluation Reports**

The SERP reviewed the Technical Evaluation Reports (TERs) prepared by NRC staff to support amendments made to SUA-1534 since renewal in 1998. None of the TERs

**CAMECO RESOURCES  
CROW BUTTE OPERATION**



**SERP 09-06**

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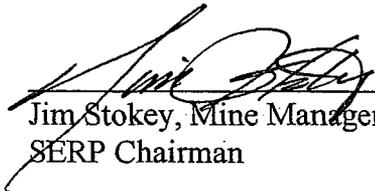
prepared since license renewal directly address issues related to approval of a new Wellhouse for operation.

**Degradation of Essential Safety or Environmental Commitment**

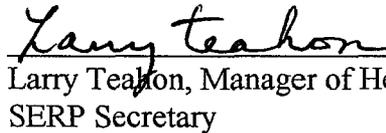
SUA-1534 allows CBR to make changes as long as they do not degrade the essential safety or environmental commitments made in the application. The SERP determined that safety commitments made in the LRA and discussed in the EA have been met and that startup of Wellhouse 52 in Mine Unit 10 will not degrade the safety and environmental commitments.

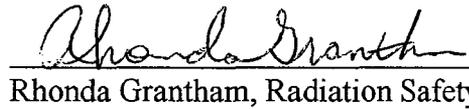
Based upon this evaluation of the licensing basis, the CBR SERP hereby approves startup and operation of Wellhouse 52 in Mine Unit 10.

Approved this 2nd day of October, 2009.

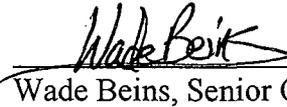
  
10-02-2009  
Jim Stokey, Mine Manager  
SERP Chairman

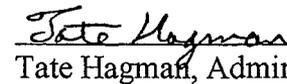
  
10-2-09  
Doug Pavlick, Operations Manager

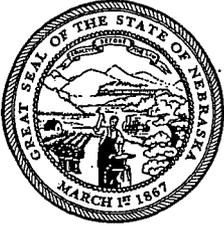
  
10/2/09  
Larry Teahon, Manager of Health, Safety and Environmental Affairs  
SERP Secretary

  
10/2/09  
Rhonda Grantham, Radiation Safety Officer

  
10/2/2009  
Bob Tiensvold, Maintenance Superintendent

  
10-2-09  
Wade Beins, Senior Geologist

  
10-2-09  
Tate Hagman, Administrative Supervisor



COPY

## STATE OF NEBRASKA

**Dave Heineman**  
Governor

**DEPARTMENT OF ENVIRONMENTAL QUALITY**  
**Michael J. Linder**

*Director*  
Suite 400, The Atrium  
1200 'N' Street  
P.O. Box 98922  
Lincoln, Nebraska 68509-8922  
Phone (402) 471-2186  
FAX (402) 471-2909  
website: [www.deq.state.ne.us](http://www.deq.state.ne.us)

**JAN 22 2009**

Mr. Steve Collings  
Crow Butte Resources, Inc.  
141 Union Boulevard, Suite 330  
Lakewood, Colorado 80228

Dear Mr. Collings:

On January 2, 2009 the Nebraska Department of Environmental Quality received a submittal of information from Crow Butte Resources, Inc. The submittal serves as a Notice of Intent to Operate and contains Well Completion Reports and Casing Integrity Test Reports for the wells in Mine Unit 10, Well House 52. Upon review of this submittal, it was noted that during the initial Mechanical Integrity Test (MIT), the test packer for one of these wells (well 4716) was located in the apatite sand zone, approximately two (2) feet above the red clay and 16 feet above the top of the formation to be mined. This well passed a deeper re-test for mechanical integrity on January 12, 2009 and the Casing Integrity Test Report for this re-tested well was received by the Department that same day.

The Department has reviewed the information submitted and determined that it is adequate and complete. Upper Control Limits and Restoration Values established for Mine Unit 10 have already been submitted and approved. Approval of the wells in Well House 52 of Mine Unit 10 will not alter those values. The Department hereby approves the Notice of Intent to Operate the wells in Well House 52 in Mine Unit 10.

If you have any questions concerning this matter, please contact Jennifer Abrahamson of my staff at (402) 471-4290.

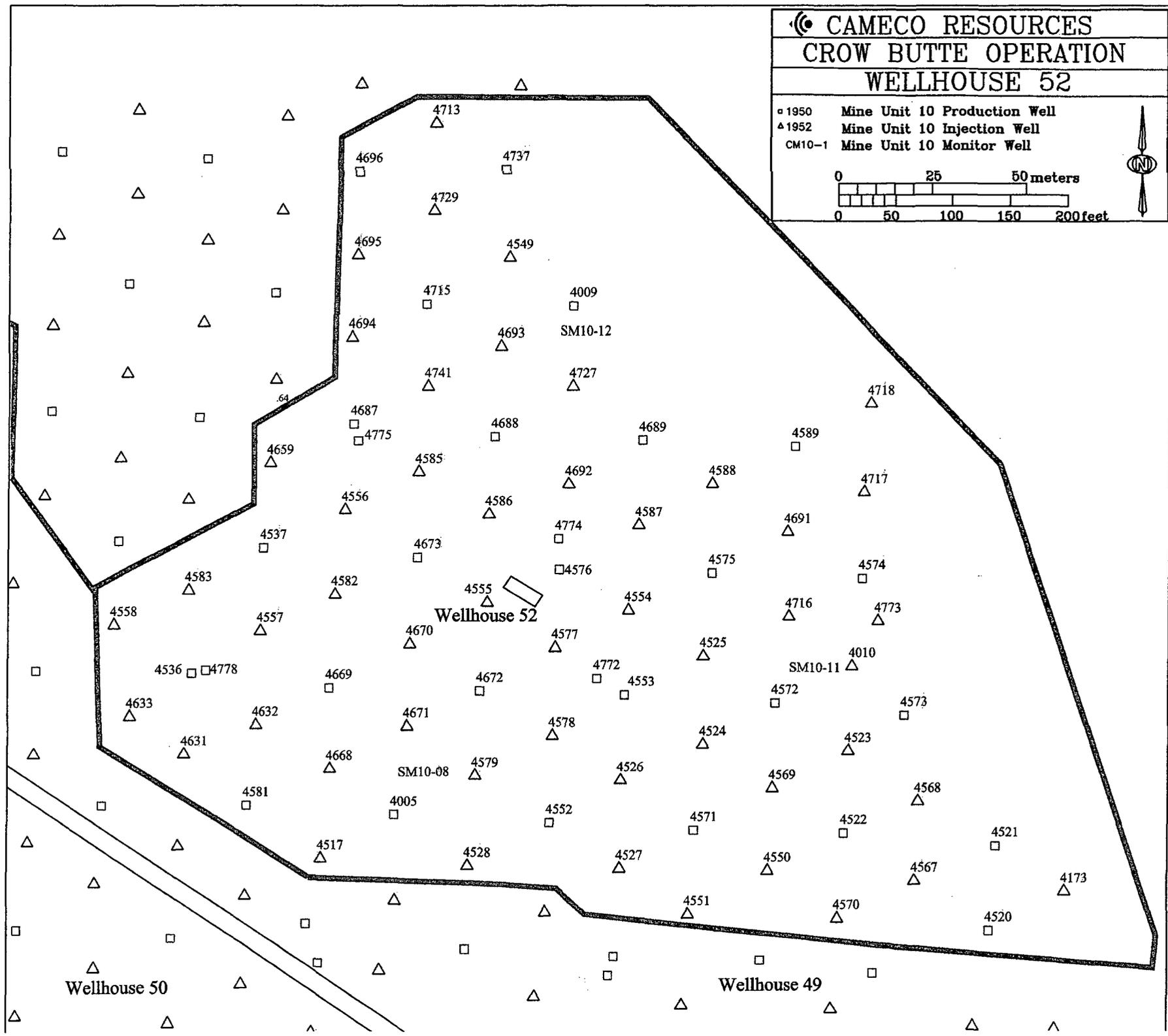
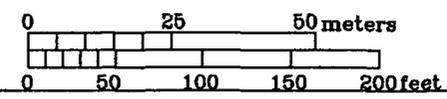
Sincerely,

Michael J. Linder  
Director

ML/jla  
word/CBR/letter/NOI\_MU10\_WH52.doc  
Cc: Dave Carlson, NDEQ  
Jim Stokey, CBR

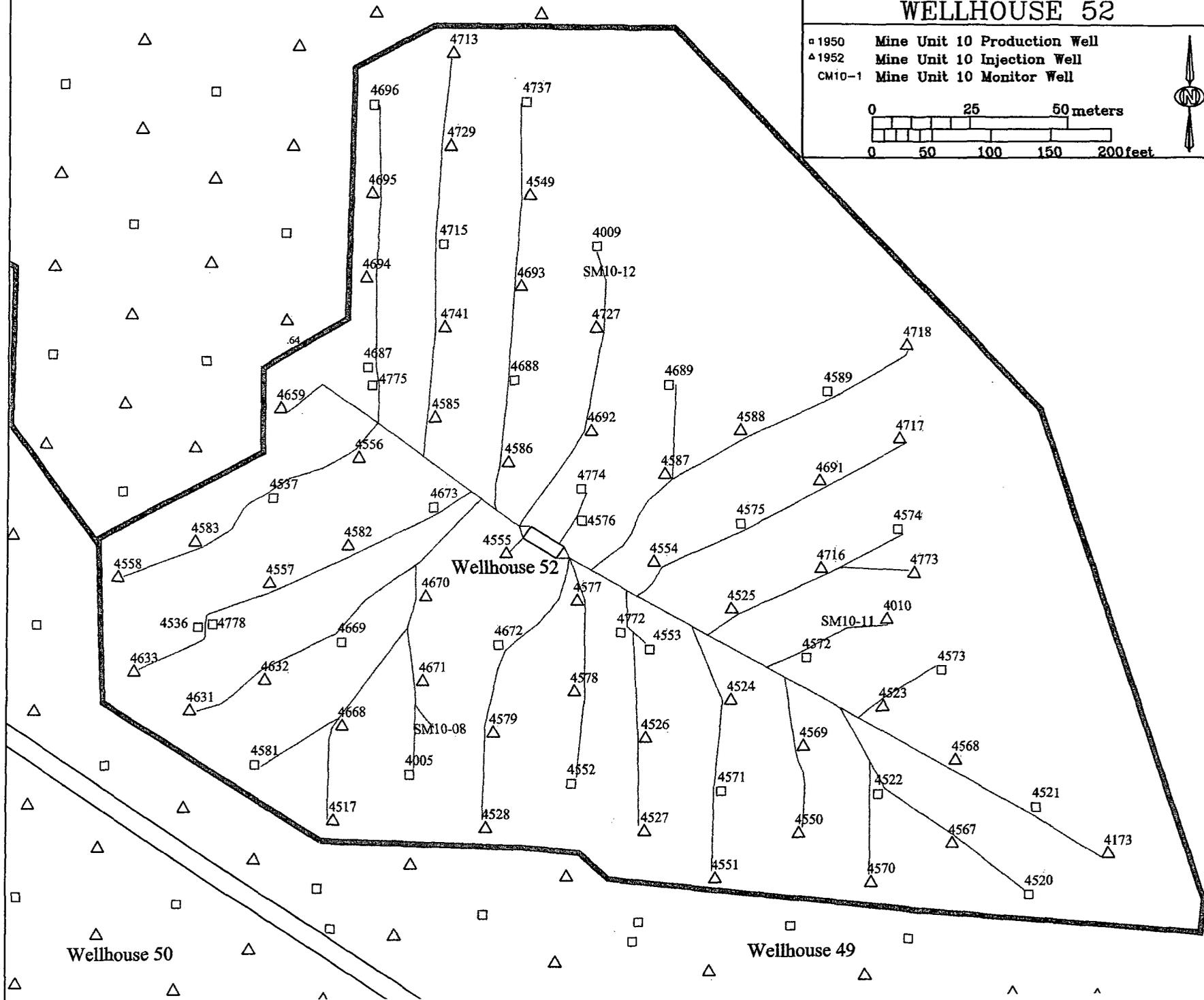
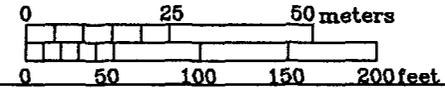
**CAMECO RESOURCES**  
**CROW BUTTE OPERATION**  
**WELLHOUSE 52**

□ 1950 Mine Unit 10 Production Well  
△ 1952 Mine Unit 10 Injection Well  
CM10-1 Mine Unit 10 Monitor Well



CAMECO RESOURCES  
CROW BUTTE OPERATION  
WELLHOUSE 52

- 1950 Mine Unit 10 Production Well
- △ 1952 Mine Unit 10 Injection Well
- CM10-1 Mine Unit 10 Monitor Well



Well House Start-Up Checklist

Well House # 52

Item	Description	Person	Comments	Date Completed	Initial
1	Permit To Operate	Beins/ Stokey		1-22-09	NB
2	Complete Pressure Testing (Trunkline and House)	McDowell/Tienvold/ Stokey		9-29	KS
3	Pipelines checked for leaks	McDowell/Tienvold/ Stokey		9-29	KS
4	Pipelines buried	McDowell/Tienvold/ Stokey		9-29	KS
5	Pressure gauges manifolds	McDowell/Tienvold/ Stokey		9-29	KS
6	Injection lines equipped with totalizing flow meters	McDowell/Tienvold/ Stokey		9-29	KS
7	Injection and Production total flows can be measured	McDowell/Tienvold/ Stokey		9-29	KS
8	Unused trunkline locked out by two separate means	McDowell/Tienvold/ Stokey		9-29	KS
9	Isolation valves are closed and chained	McDowell/Tienvold/ Stokey		9-29	KS
10	Map of 2" lines in house	McDowell/Beins/Tienvold/ Stokey		10-1	KS
11	Well-field Layout map in house	McDowell/Beins/Tienvold/ Stokey		10-1	KS
12	Check berms	Teahon/Tienvold/ Stokey		10/1	BT
13	Pressure check oxygen lines	Roberts/Tienvold/ Stokey	O.R. 125PSI 30min	9-24-09	R.R.
14	Continuity check on producers	Scoggan/Tienvold/ Stokey		10-1	JA
15	Ground fault check	Scoggan/Tienvold/ Stokey		10-1	JA
16	Communications wire check	Hagman/Tienvold/ Stokey		9/28	BT
17	Heater size check	Scoggan/Tienvold/ Stokey		10-1	JA
18	Processor installed well house	Hagman/Tienvold/ Stokey		9/28	TH
19	UPS installed and operational	Scoggan/Tienvold/ Stokey		9/28	BT
20	Wet house alarm installed	Scoggan/Tienvold/ Stokey		10-1	JA
21	Wet house alarm checked	Scoggan/Tienvold/ Stokey		10/1	BT
22	Oxygen solenoid checked	Hagman/Tienvold/ Stokey		10/1	BT
23	Check fuses in control panel	Scoggan/Tienvold/ Stokey		10-1	JA
24	Program MMI	Hagman/Tienvold/ Stokey		9/30	TH
25	Program PLC	Hagman/Tienvold/ Stokey		9/30	TH
26	Set Scalar Card 'K' Factors	K. Forbes/P. Dunn/Tienvold/ Stokey		8-1-09	PF
27	Off tags and lockouts	K. Forbes/P. Dunn/Tienvold/ Stokey		10-1	JA
28	Contaminated and uncontaminated cans	K. Forbes/P. Dunn/Tienvold/ Stokey		8-1-09	KF
29	Complete 2" lateral inspection	McDowell/Tienvold/ Stokey		9-29	KS
30	Visually inspect entire system to plant	McDowell/Tienvold/ Stokey		9-29	KS
31	Labels on Monitor Wells	McDowell/Tienvold/ Stokey		9-29	KS
32	Valve Station Covers and Stairs Built	Roberts/Tienvold/ Stokey		9-29	KS
33	Manifold Pressure Switches Installed	Scoggan/Tienvold/ Stokey		10-1	JA
34	Injection Filter Installed	McDowell/Tienvold/ Stokey		9-29	KS
35	Filter instrumentation and gauges installed	McDowell/Tienvold/ Stokey		9-29	BT
	Electric door lock installed	Scoggan/Tienvold/ Stokey		10-1	JA
	Update Daily Walk Through Inspection form EHS 4-1	Teahon/Tienvold/ Stokey		10-2	KS

**WELLHOUSE #52**

#12 ft. Lim. 700

WELL #	AIR LIFT FLOW GPM	Number of Injectors	Target flow for injectors	DISTANCE FT	PIPE DIAMETER	STRINGER DEPTH	TOTAL LENGTH	SURFACE		SURFACE+DOWNHOLE		
								#12 WIRE	#10 WIRE	#12 WIRE	#10 WIRE	
1	P 4005	7	6	1.2	226	2"	300	526	226	0	526	
2	P 4009	15	3	5.0	271	2"	300	571	271	0	571	
3	P 4520	20	2	10.0	462	2"	300	762	0	462		762
4	P 4521	25	3	8.3	426	2"	300	726	0	426		726
5	P 4522	20	6	3.3	311	2"	300	611	311	0	611	
6	P 4536	20	6	3.3	337	2"	300	637	337	0	637	
7	P 4537	20	6	3.3	270	2"	300	570	270	0	570	
8	P 4552	15	6	2.5	179	2"	300	479	179	0	479	
9	P 4553	25	6	4.2	88	2"	300	388	88	0	388	
10	P 4571	15	6	2.5	217	2"	300	517	217	0	517	
11	P 4572	20	6	3.3	201	2"	300	501	201	0	501	
12	P 4573	15	4	3.8	306	2"	300	606	306	0	606	
13	P 4574	25	4	6.3	257	2"	300	557	257	0	557	
14	P 4575	30	6	5.0	132	2"	300	432	132	0	432	
15	P 4576	20	6	3.3	46	2"	300	346	46	0	346	
16	P 4581	15	6	2.5	320	2"	300	620	320	0	620	
17	P 4589	5	4	1.3	248	2"	300	548	248	0	548	
18	P 4669	10	6	1.7	210	2"	300	510	210	0	510	
19	P 4672	20	6	3.3	98	2"	300	398	98	0	398	
20	P 4673	20	6	3.3	141	2"	300	441	141	0	441	
21	P 4687	25	6	4.2	254	2"	300	554	254	0	554	
22	P 4688	25	6	4.2	173	2"	300	473	173	0	473	
23	P 4689	25	4	6.3	169	2"	300	469	169	0	469	
24	P 4696	15	6	2.5	433	2"	300	733	0	433		733
25	P 4715	30	6	5.0	303	2"	300	603	303	0	603	
26	P 4737	20	4	5.0	394	2"	300	694	394	0	694	
27	P 4772	10	5	2.0	60	2"	300	360	60	0	360	
28	P 4774	20	6	3.3	71	2"	300	371	71	0	371	
29	P 4775	10	6	1.7	242	2"	300	542	242	0	542	
30	P 4778	10	6	1.7	316	2"	300	616	316	0	616	
				7161				16161	5840.0	1321	13940.0	2221.0

WELLHOUSE #52

Kirk's Sheet

	Injector Well #	1"	1-1/4"	1-1/2"	2"	Prod Well #	Wire AWG
1	I 4010	4010				P 4005	12
2	I 4173			4173		P 4009	12
3	I 4517	4517				P 4520	10
4	I 4523		4523			P 4521	10
5	I 4524	4524				P 4522	12
6	I 4525		4525			P 4536	12
7	I 4526		4526			P 4537	12
8	I 4527		4527			P 4552	12
9	I 4528	4528				P 4553	12
10	I 4549		4549			P 4571	12
11	I 4550		4550			P 4572	12
12	I 4551		4551			P 4573	12
13	I 4554	4554				P 4574	12
14	I 4555	4555				P 4575	12
15	I 4556		4556			P 4576	12
16	I 4557	4557				P 4581	12
17	I 4558		4558			P 4589	12
18	I 4567			4567		P 4669	12
19	I 4568			4568		P 4672	12
20	I 4569	4569				P 4673	12
21	I 4570		4570			P 4687	12
22	I 4577	4577				P 4688	12
23	I 4578	4578				P 4689	12
24	I 4579	4579				P 4696	10
25	I 4582	4582				P 4715	12
26	I 4583		4583			P 4737	12
27	I 4585		4585			P 4772	12
28	I 4586	4586				P 4774	12
29	I 4587		4587			P 4775	12
30	I 4588		4588			P 4778	12
31	I 4631		4631				
32	I 4632		4632				
33	I 4633		4633				
34	I 4659		4659				
35	I 4668	4668					
36	I 4670	4670					
37	I 4671	4671					
38	I 4691		4691				
39	I 4692		4692				
40	I 4693		4693				
41	I 4694			4694			
42	I 4695		4695				
43	I 4713		4713				
44	I 4716		4716				
45	I 4717	4717					
46	I 4718	4718					
47	I 4727		4727				
48	I 4729		4729				
49	I 4741		4741				
50	I 4773		4773				
51	I 0						

Straight Line  
Pipe Lengths

Size	Length
1"	3342
1 1/4"	7395
1 1/2"	1542
2"	7161

18

28

4

0

## WELLHOUSE #52

WELL#	WIRE
P4005	#12
P4009	#12
P4520	#10
P4521	#10
P4522	#12
P4536	#12
P4537	#12
P4552	#12
P4553	#12
P4571	#12
P4572	#12
P4573	#12
P4574	#12
P4575	#12
P4576	#12
P4581	#12
P4589	#12
P4669	#12
P4672	#12
P4673	#12
P4687	#12
P4688	#12
P4689	#12
P4696	#10
P4715	#12
P4737	#12
P4772	#12
P4774	#12
P4775	#12
P4778	#12



**CROW BUTTE RESOURCES, INC.**

86 Crow Butte Road

P. O. Box 169

Crawford, Nebraska 69339-0169

(308) 665-2215

(308) 665-2341 - FAX

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GROUND RESISTANCE TEST RECORD

TEST SET USED: AEMC Model 3711 Ground Resistance Tester

GROUND TEST RESULTS: Wellhouse 52

OHMS: Resistance Total (Rt) = 2.23 OHMS

R1 is NRPPD pole ground rod, R2 and R3 are the ground rods installed at the header house

$$R_t = \frac{1}{(1/R_1 + 1/R_2 + 1/R_3)}$$

$$R_t = \frac{1}{(1/7.5 + 1/7.4 + 1/5.6)}$$

Rt = 2.23 Ohms

CONCLUSIONS:

THE TEST RESULTS ARE SATISFACTORY

TEST PERFORMED BY:

CROW BUTTE RESOURCES, INC.

  
\_\_\_\_\_  
Gabe Scoggan

Date: September 29, 2009





Item #	Well #	Initialed by	Comments
1		4010	OK
2		4173	OK
3		4517	OK
4		4523	OK
5		4524	OK
6		4525	OK
7		4526	OK
8		4527	OK
9		4528	OK
10		4549	OK
11		4550	OK
12		4551	OK
13		4554	OK
14		4555	OK
15		4556	OK
16		4557	OK
17		4558	OK
18		4567	OK
19		4568	OK

Item #	Well #	Initialed by	Comments
20		4569	OK
21		4570	OK
22		4577	OK
23		4578	OK
24		4579	OK
25		4582	OK
26		4583	OK
27		4585	OK
28		4586	OK
29		4587	OK
30		4588	OK
31		4631	OK
32		4632	OK
33		4633	OK
34		4659	OK
35		4668	OK
36		4670	OK
37		4671	OK
38		4691	OK

Item #	Well #	Initialed by	Comments
39		4692	OK
40		4693	OK
41		4694	OK
42		4695	OK
43		4713	OK
44		4716	OK
45		4717	OK
46		4718	OK
47		4727	OK
48		4729	OK
49		4741	OK
50		4773	OK



Well House Pressure Check Verification

Pressure check for Well House 52

Date: 9-30-09

**Injection:**

On 9-24-09 the injection lines and 2" laterals were pressured to 125 psi. This was done using a centrifugal pump and potable water. The time interval was as follows:

Start: 125 psi at ~~AM/PM~~ 30 minutes  
Stop: 121 psi at ~~AM/PM~~

The section of trunk line checked was from valve station 12-52 to the well field in

WH 52 *AK*

**Production:**

On 9-25 the production trunk lines and 2" laterals were pressured to 125 psi. This was done using a centrifugal pump and potable water. The pressure and time interval was as follows:

Start: 125 psi at ~~AM/PM~~ 30 minutes  
Stop: 122 psi at ~~AM/PM~~

The section of trunk line was from valve station 12-52 to the well field in

WH 52 *AK*

**Oxygen:**

On 9-24-09 the oxygen line was pressured to 125 psi. The pressure and time interval was as follows:

Start: 125 psi at ~~AM/PM~~ 30 minutes  
Stop: 125 psi at ~~AM/PM~~

The section of trunk line checked was from valve station 12-52 to the well field in

WH 52

*Ken B. Jones*  
Well Field Construction Foreman

# CAMECO RESOURCES

## CROW BUTTE OPERATION



### CROW BUTTE OPERATION

#### Daily Walk-Through Inspection

For the Week of \_\_\_\_\_ through \_\_\_\_\_

Main Plant	SUN	MON	TUE	WED	THU	FRI	SAT
Ventilation							
Visible Yellowcake							
Spills							
General Housekeeping							
Electrical Hazards							
Shift Logs Reviewed							
Bulk Chemical Storage							
Other Hazards							
Potable Water Pressure Reading If < 20 psi; contact Plant Foreman	psi	psi	psi	psi	psi	psi	psi
Inspected By:							
<b>R.O. Building</b>							
Ventilation							
General Housekeeping							
Electrical Hazards							
Inspected By:							
<b>Wellfield and Wellhouses</b>							
MU 2 Wellfield & WH# 3-5							
MU 3 Wellfield & WH# 6-8							
MU 4 Wellfield & WH# 9-13							
MU 5 Wellfield & WH# 14-20							
MU 6 Wellfield & WH# 21-27							
MU 7 Wellfield & WH# 28-33							
MU 8 Wellfield & WH# 34-40, 46							
MU 9 Wellfield & WH# 41-45, 47							
MU 10 Wellfield & WH# 48-56							
Inspected By:							
<b>Booster Pump House - Production</b>							
<b>Booster Pump House - Injection</b>							
Inspected By:							
<b>Deep Well Building</b>							
Inspected By:							
<b>Fuel Storage Area</b>							
Inspected By:							
√ = Inspected and no action needed				* = See Comments on Back of Form			