

April 26, 2011

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

FROM: Douglas Mandeville, Project Manager
Uranium Recovery Licensing Branch
Decommissioning and Uranium Recovery
Licensing Directorate
Division of Waste Management
and Environmental Protection
Office of Federal and State Materials
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SUBJECT: PUBLIC MEETING SUMMARY

On March 17, 2011, a public meeting was held with Cameco Resources, doing business as Power Resources, Inc., (PRI) at U.S. Nuclear Regulatory Commission Headquarters. The purpose of the meeting was to discuss PRI's supplement to its license renewal application. A summary of the meeting is enclosed.

Docket No: 40-8964
License No: SUA-1548

Enclosure: Meeting Summary

cc: Meeting Attendees (via email)

CONTACT: Douglas Mandeville, FSME/DWMEP
(301) 415-0724

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FROM: Douglas Mandeville, Project Manager **/RA/**
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DISTRIBUTION:
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ML110950230

OFFICE	DWMEP	DWMEP	DWMEP
NAME	DMandeville	BGarrett	DMandeville
DATE	4/ 26 /11	4/ 26 /11	4/26 /11

OFFICIAL RECORD COPY

MEETING REPORT

DATE: March 17, 2011

TIME: 8:00 a.m. to 9:45 a.m.

PLACE: U.S. Nuclear Regulatory Commission
Two White Flint North, Rockville, Maryland
Room T-3C1

PURPOSE: This meeting was held at the request of Cameco Resources, doing business as Power Resources, Inc., to discuss the supplement to its license renewal application.

ATTENDEES:

See Attendees List (Attachment 2).

BACKGROUND:

By letter dated August 12, 2010, Power Resources, Inc. (PRI), doing business as Cameco Resources (CR), submitted to the U.S. Nuclear Regulatory Commission (NRC) an application to renew Source Materials License SUA-1548, which authorizes uranium in-situ recovery (ISR) operations at the Smith Ranch-Highland Uranium Project (SR-HUP) and its related satellite facilities. The license renewal application (LRA) is currently available through NRC's Agencywide Document Access and Management System (ADAMS) under Accession Number ML102360313. The staff initiated its acceptance review of the LRA on November 1, 2010. During the acceptance review, the staff identified several items that were either not consistent with regulatory requirements or did not appear to be present in the LRA. These items were identified in a February 4, 2011, letter to Cameco Resources (see Accession Number ML103400310).

DISCUSSION:

NRC staff read the opening statement for the meeting and the attendees proceeded with a discussion of the project. No slides were presented at this meeting; however, CR did provide a draft outline of the supplement to the LRA (Attachment 3). Discussion topics from the meeting are presented below.

The staff identified that a license renewal document should consider SR-HUP's past performance, current status, as well as its future. This information should be provided for all aspects of the license facility (i.e., SR-HUP as well as the remote satellite facilities at Ruth, North Butte, and Gas Hills).

When considering past performance, the following items should be discussed:

- compliance history (e.g., inspection results and notices of violation);
- records of spills, leaks, or excursions and how they were addressed;

Enclosure

- semi-annual effluent monitoring reports and analysis of what the data indicate;
- a summary of license amendments issued;
- a summary of changes made to the facility through the safety and environmental review panel (SERP) process;
- updates to operating practices or procedures to reflect observed performance (e.g., were estimates related to amount of time a well field is in operation and restoration consistent with what was expected?);
- updates to site characterization data based on new knowledge of the site;
- performance of waste disposal methods (see specific discussion on waste disposal below); and
- assessment of doses to workers and members of the public.

When considering the current status of the facility, the license renewal document should accurately portray the status of the facility, such as:

- number of well fields in operation;
- number of well fields in restoration;
- progress toward reaching ground water restoration standards for well fields in restoration;
- identification of satellite facilities that have been added to the license;
- current waste generation rates, disposal methods, and disposal capacity (see specific discussion on waste disposal below);
- current uses of land and water around the facility;
- the current ground water consumptive use and cumulative drawdown;
- current status of natural resource development activities near facility (see specific discussion on resource development activities below);
- current population around the facility;
- summary of current financial assurance estimate and mechanism;
- identification of restricted, controlled, and unrestricted areas (see specific discussion on radiation protection below); and
- results of testing or monitoring that support current radiation protection practices (see specific discussion on radiation protection below).

When considering the future of the facility, the license renewal document should consider questions such as:

- what will the footprint and layout of the facility be?
- what changes to land use, water use, and population could occur?
- will additional waste disposal capacity be needed (see specific discussion on waste disposal below)?
- what changes to natural resource development activities near the facility could occur (see specific discussion on resource development activities below)?
- will there be any changes to areas identified as restricted, controlled, or unrestricted (see specific discussion on radiation protection below)? and
- what is the anticipated consumptive use of ground water and what is the related cumulative drawdown?

Specific Discussion Topics

Waste Disposal

As part of its safety review of the license renewal document, the staff has to be able to make a finding that the facility has adequate disposal capacity for byproduct material. The license renewal document should contain sufficient information for the staff to perform a credible review. The license renewal document should clearly identify the approved disposal methods, licensed or permitted capacity, status (i.e., licensed, constructed, or operational), as well as the current and future disposal needs. The license renewal document should also discuss what alternatives would be considered in the event that regulatory approval by other agencies cannot be obtained.

Resource Development Activities

The staff is aware of increased resource development activities within the Powder River Basin that are focused on uranium, wind energy, coal bed methane, as well as oil and gas in the Niobrara Shale. For example, during the August 2010 inspection, the staff observed increased wind farm development near the southwestern portion of SR-HUP. Additionally, the staff has been reviewing applications for new ISR facilities that are in close proximity to the North Butte satellite facility. From a National Environmental Policy Act standpoint, these activities should be identified and discussed in the renewal document so that proper disclosure can be made. Additionally, from an environmental standpoint, the cumulative impacts these activities may have on each environmental resource area within the affected environment should be addressed. From a safety standpoint, the impacts these activities may have on monitoring locations, dose to members of the public, water usage, and cumulative drawdown should be addressed. Discussion of resource development activities should consider what development may occur in the next 10 years.

Radiation Protection

From a radiation protection standpoint, the staff observes that it could be helpful for CR to clearly identify restricted areas, controlled areas, and unrestricted areas at the facility. These designations form the basis for determining acceptable dose limits within the radiation protection program. Identification of these areas could be made in the form of a figure, or through a narrative. During the meeting, CR indicated that it has performed additional monitoring and testing of various aspects of the facility related to radiation protection. If these tests and results provide the basis for decisions related to the radiation protection program at the facility, the staff recommends they be included in the license renewal document.

Environmental Review

The staff notes that the draft outline (see Attachment 3) includes sections for Smith Ranch and North Butte but does not appear to include the additional remote satellites at Ruth or Gas Hills. The LRA should address all aspects of the licensed facility. Additionally, the staff notes that the Environmental Impacts chapter is divided into sections, within each resource area, for each site, e.g. North Butte. As part of the environmental review, the staff will evaluate the possible combined impacts of activities from any two, three, or all four sites on a resource area. The

staff observes that it may be beneficial to provide the environmental impacts to the affected resources in a resource-specific way as opposed to (or in addition to) a site-specific way.

ACTIONS:

The meeting ended at approximately 9:50 a.m. Five action items were identified during the meeting for the staff to consider. These action items and the NRC response follow below.

Action Item 1: CR asked if it is possible to re-visit baseline water quality calculations.

NRC Response: The staff notes that CR has the opportunity to propose changes to its license or procedures for the staff to review.

Action Item 2: CR asked for guidance on license conditions that have been developed as part of the staff's review of new ISR facilities.

NRC Response: The staff notes that publicly available versions of draft licenses for new ISR facilities are available in ADAMS under accession numbers ML102370408, ML110590104, and ML103340234.

Action Item 3: CR asked about the preferred format of the submittal (electronic versus hard copy) and how many copies should be submitted.

NRC Response: The staff recommends that the licensee consider using the NRC's electronic system when submitting the supplement to its LRA. Use of this system reduces the number of hard copies that would need to be prepared. If the electronic system is used, the NRC project manager requests that one hard copy of the submittal be sent to the following address:

Douglas Mandeville
U.S. Nuclear Regulatory Commission
Two White Flint North, Mailstop T8F5
11545 Rockville Pike
Rockville, MD 20852

This hard copy would provide the project manager and review staff an alternative method to reviewing large scale drawings or figures present in the supplement to the LRA. Note that the NRC has a dedicated help desk to provide assistance with electronic submittals; information on the help desk can be found here:

<http://www.nrc.gov/site-help/e-submittals/contact-us-eie.html>

If the licensee chooses to submit the supplement to the LRA as a hard copy, the NRC PM requests that four copies be submitted. One copy should be submitted to the document control desk at the following address:

Attn: Document Control Desk
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
Washington, DC 20555-0001

The remaining copies should be submitted directly to the project manager at the first address above.

Action Item 4: CR asked if the environmental review component of the staff's review (environmental assessment or environmental impact statement [EIS]) would be published for public comment.

NRC Response: If the environmental review results in the preparation of an EIS, a draft version of the document would be published for public comment. If the environmental review results in the preparation of an EA, the staff may choose to publish a draft version of an EA for public comment. At this time, the staff does not publish EAs for public comment.

Action Item 5: CR asked if license renewal applications would be candidates for a pre-submittal audit.

NRC Response: The staff would consider performing a pre-submittal audit for a license renewal application. Note that this would have to be requested by the licensee and is subject to availability of staff and travel funds.

Attachments:

1. Agenda
2. List of Attendees
3. Draft Outline of LRA from Cameco Resources

MEETING AGENDA
Comeco Resources/Power Resources, Inc. (PRI).
Thursday March 17, 2011

MEETING PURPOSE: To Discuss Comeco Resources/PRI's Supplement to Its License Renewal Application.

MEETING PROCESS:

<u>Time</u>	<u>Topic</u>	<u>Lead</u>
8:00 a.m.	Introductions	All
	License Renewal Application Status	PRI
	Table of Contents for Supplement	PRI
	Enclosure to NRC's February 4, 2011 letter	PRI/NRC
	Discussion	All
	Summary of Action Items	Moderator
	Public Comments/Questions	
10:00 a.m.	Adjourn	

Attachment 1