August 2, 2011

Mr. Jon F. Winter
Manager, Environmental &
Regulatory Affairs, Wyoming
Uranium One USA, Inc.
907 N. Poplar Street, Suite 260
Casper, WY 82601

SUBJECT: URANIUM ONE WILLOW CREEK PROJECT (IRIGARAY AND CHRISTENSEN RANCH), LICENSE SUA-1341, AMENDMENT REQUEST TO USE EITHER SULFURIC ACID OR HYDROCHLORIC ACID IN THE YELLOWCAKE PRECIPITATION PROCESS AND TO MAKE THE TECHNICAL QUALIFICATIONS FOR THE RADIATION SAFETY TECHNICIAN CONSISTENT WITH NRC REGULATORY GUIDE 8.31, LICENSE AMENDMENT NO. 20 (TAC J00643)

Dear Mr. Winter:

By letter dated February 4, 2011, Uranium One USA, Inc. (Uranium One) requested an amendment to Materials License SUA-1341 that would (1) allow the use of either sulfuric acid or hydrochloric acid in the yellowcake precipitation process at Uranium One's Willow Creek (Irigaray) Central Processing Plant; and (2) make the technical qualifications for a Radiation Safety Technician (RST) consistent with those recommended for a Health Physics Technician in U.S. Nuclear Regulatory Commission (NRC) Regulatory Guide 8.31, Rev. 1, "Information Relevant to Ensuring that Occupational Radiation Exposures at Uranium Recovery Facilities will be As Low As Is Reasonably Achievable." The NRC accepted the request for technical review on April 28, 2011. By letter dated February 4, 2011, Uranium One requested that the NRC review the qualifications of one of its employees to be an RST at its Willow Creek facility. These requests were reviewed together.

NRC staff has reviewed and approved the amendment request, and has verified that the qualifications of the employee stated in the February 4, 2011 request are sufficient for an RST under the amended license. The enclosed Safety Evaluation Report provides the staff basis for approving the license amendment request and verifying the sufficiency of the employee's qualifications. Also enclosed is Amendment Number 20 to Materials License SUA-1341. The staff determined that this licensing action falls within a category of actions that do not require an environmental assessment under § 51.22(c)(11) of Title 10 of the *Code of Federal Regulations* (10 CFR). In an e-mail dated July 8, 2011, Uranium One agreed to the proposed changes to Materials License SUA-1341.

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

If you have any questions regarding this letter, please contact Ron Linton at (301) 415-7777, or by email at ron.linton@nrc.gov.

Sincerely,

/RA/

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

Docket No.: 040-08502
License No.: SUA-1341

(Closes TAC J00643)

Enclosures:
1. Safety Evaluation Report
2. License Amendment No. 20

cc: Glenn Mooney (WDEQ)

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DISTRIBUTION:
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SAFETY EVALUATION REPORT

Docket No.: 040-08502

License No.: SUA-1341

Facility: Willow Creek Project (Irigaray and Christensen Ranch Project)

Project Manager: Ron C. Linton

Technical Reviewers: Thomas McLaughlin, Thomas Youngblood

Summary and Conclusions:

By letter dated February 4, 2011, and supplemented by e-mail correspondence dated June 17, 2011, Uranium One USA, Inc. (Uranium One or licensee) requested an amendment to Materials License SUA-1341 and submitted several page changes to its approved license application (Uranium One, 2011, 2011c). The amendment and changes to the application would (1) allow the use of either sulfuric acid or hydrochloric acid in the yellowcake precipitation process at the licensee's Willow Creek Central Processing Plant (CPP); and (2) make the qualifications for the Radiation Safety Technician (RST) consistent with those recommended for a Health Physics Technician (HPT) in U.S. Nuclear Regulatory Commission (NRC) Regulatory Guide (RG) 8.31 (NRC, 2002). By letter dated February 4, 2011, the licensee requested that the NRC staff verify that one of its employees has sufficient qualifications to serve as an RST for the Willow Creek in-situ uranium recovery operations. These three requests were reviewed by NRC staff and the results of this review are documented in this Safety Evaluation Report (SER).

Staff finds that the licensee's request to use either sulfuric acid or hydrochloric acid in the yellowcake precipitation process is acceptable, as these chemicals are commonly used in the uranium recovery industry and have similar chemical properties. Staff finds that the licensee's request to allow its RSTs to have qualifications that are equal or equivalent to those specified in RG 8.31 for an HPT is acceptable, as it conforms to NRC published guidance. Staff finds that employee referred to in the February 4, 2011 request is qualified to be a RST under the amended license. These conclusions are further discussed in the body of this SER.

License Condition 9.3 in Materials License SUA-1341 will be amended, as requested by the licensee, as follows (changes to the license bolded):

> The licensee shall conduct operations in accordance with the commitments, representations, and statements contained in the January 5, 1996, license renewal application submittal as revised by the September 3, 1997, "Responses to NRC comments on the License Renewal Application for Source Materials License SUA- 1341," as supplemented by the December 13, 1996, submittal, requesting a performance based license condition for approval of the startup of

> new well fields, including standard operating procedures, **and supplemented by the February 4, 2011, and June 17, 2011, submittals requesting approval for the use of sulfuric acid in the yellowcake precipitation process and clarification of radiation safety technician qualifications**, hereinafter referred to as the "approved license application." The approved license application is hereby incorporated by reference except where superseded by license conditions below. . . .

License Condition 9.12 in Materials License SUA-1341 will be amended as follows (changes to the license bolded):

> The RSO shall have the health physics authorities, responsibilities, and technical qualifications identified in Regulatory Guide 8.31. **Health Physics Technicians or Radiation Safety Technicians should have qualifications that are equal or equivalent to those specified in Regulatory Guide 8.31, Section 2.4.2 (Revision 1).**

Background:

The licensee operates the Willow Creek in-situ recovery (ISR) project that consists of the Irigaray and Christensen Ranch sites in the Powder River basin of Wyoming. The Irigaray site consists of a CPP and decommissioned well fields, and the Christensen Ranch site consists of a satellite ion exchange facility and well fields used for uranium recovery. The project is in operational status.

By letter dated February 4, 2011, the licensee requested an amendment to change two provisions of Materials License SUA-1341 (Uranium One, 2011). The first requested change pertains to altering the license to allow the use of either sulfuric acid or hydrochloric acid in the yellowcake precipitation process at the licensee's Willow Creek (Irigaray) CPP. The second requested change pertains to updating the technical qualifications for the RST incorporated in the license to be consistent with those specified in NRC RG 8.31, Section 2.4.2 for an HPT. The licensee noted in its application that the terms RST and HPT are synonymous in its organizational structure.

For this request, the licensee submitted several page changes as supplements to the approved license application.

The licensee requested that SUA-1341, License Condition 9.3, be amended to read as follows (requested change in bold):

> The licensee shall conduct operations in accordance with the commitments, representations, and statements contained in the January 5, 1996, license renewal application submittal as revised by the September 3, 1997, "Responses to NRC comments on the License Renewal Application for Source Materials License SUA- 1341," as supplemented by the December 13, 1996, submittal, requesting a performance based license condition for approval of the startup of new well fields, including standard operating procedures, **and supplemented by the February 4, 2011, submittal requesting approval for the use of sulfuric**

> **acid in the yellowcake precipitation process and clarification of radiation safety technician qualifications**, hereinafter referred to as the "approved license application." The approved license application is hereby incorporated by reference except where superseded by license conditions below. . . .

In a letter dated February 4, 2011, the licensee requested that the NRC staff verify that one of its employees is qualified to serve as a Radiation Safety Technician[1] for the Willow Creek in-situ uranium recovery operations (Uranium One, 2011a). The licensee attached to its request the education and training of the employee. The NRC staff docketed this education and training information in its Agencywide Documents and Access Management System, but withheld it from public access due to the inclusion of personally identifiable information in the submission. This safety evaluation report also addresses this request.

In its February 4, 2011, letter requesting a license amendment, the licensee also submitted a page change to the approved license renewal application that would alter the qualifications for the licensee's RST. The page change, submitted with the February 4, 2011, letter, requested that the language from Section 2.4.2(2) of RG 8.31 be added to the list of possible qualifications for a RST. The NRC staff informed the licensee in a publicly-noticed meeting on June 2, 2011, that because the page change submitted on February 4, 2011 states that the RST "*will* have one of the" two listed sets of qualifications, the licensee's RST must have one of the listed sets of qualifications. In effect, the page change submitted on February 4, 2011, if approved by the NRC staff, would make the qualifications specified in RG 8.31, Sections 2.4.2(1) and (2) mandatory for the licensee's RSTs, even though RG 8.31 itself does not require, but rather recommends, these qualifications for an HPT. By e-mail dated June 17, 2011 (Uranium One, 2011c), the licensee submitted a revised page change stating that the RST "*should* have one of the" two listed sets of qualifications.

Safety Evaluation:

Use of Sulfuric Acid in the Uranium Precipitation Process

The licensee has requested authorization to use either hydrochloric acid or sulfuric acid in its yellowcake precipitation process. The current approved license application states that only hydrochloric acid is added to the uranium bearing solution to break down the uranyl carbonate present in solution. The licensee stated that the primary reason for this license amendment request is due to the potentially significant operational cost savings and the flexibility to change the type of acid used should [acid] availability become an issue. The staff notes that sulfuric acid is currently licensed for use by the licensee in the groundwater restoration circuit and sulfuric acid has been used at Willow Creek in the past. However, sulfuric acid is currently not in use at Willow Creek, as no well fields are undergoing active restoration. The licensee has submitted supplemental pages to the approved license application referencing the use of either acid in the uranium precipitation process.

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[1] In an electronic mail dated May 9, 2011 (Uranium One, 2011b), the licensee clarified that the term "Radiation Protection Technician," which was used in its February 4, 2011, letter requesting review of the employee's qualifications, is a historical term that should no longer be used, and that the correct term is "Radiation Safety Technician."

The NRC staff analyzed the use of either sulfuric acid or hydrochloric acid in the precipitation and drying circuit in its 2009 Generic Environmental Impact Statement (GEIS) on ISR Milling stating in Section 2.4.2.3, "the pregnant eluant is typically acidified using hydrochloric or sulfuric acid to destroy the uranyl carbonate complex" (NRC, 2009). Staff found in Section 4.2.11.2.4 of the GEIS that offsite environmental impacts from hydrochloric acid, sulfuric acid, and other non-radiological chemicals would be small, while impacts received by workers involved in response and cleanup could be moderate impacts that would be mitigated by establishing procedures and training requirements.

The NRC recognized the use of both acids in NUREG/CR-6733, stating in Section 2.2.3 that in "the precipitation and drying circuit, the pregnant eluant is acidified using hydrochloric or sulfuric acid to destroy the uranyl carbonate complex" (NRC, 2011). The NRC contractor that authored NUREG/CR-6733, the Center for Nuclear Waste and Regulatory Analysis, recommended that NRC guidance specify that uranium ISR facility operators follow design and operating practices published in accepted codes and standards that govern sulfuric acid systems.

The use of either sulfuric acid or hydrochloric acid in the precipitation circuit has been reviewed and approved for use at other NRC-licensed sites. The NRC completed an SER for the Moore Ranch ISR Project (NRC, 2010), approving sulfuric acid as well as hydrochloric acid for use in the precipitation circuit. The staff noted in Section 3.2.3 of the Moore Ranch SER that either sulfuric or hydrochloric acid will be used in the precipitation circuit, and concluded that the information provided by the applicant met the criteria in Section 3.2.3 of the Standard Review Plan for ISR license applications (NRC, 2003), as well as the requirements of §§ 40.32(c) and 40.41(c) of Title 10 of the *Code of Federal Regulations* (10 CFR).

In its February 4, 2011, submittal, the licensee stated that the sulfuric acid storage tank is a 6,500 gallon volume capacity, double-walled tank for secondary containment concerns constructed of polyethylene plastic material for sulfuric acid compatibility. The tank is set on the foundation that previously held the hydrogen peroxide tank. A structural engineering firm evaluated the foundation to confirm that it is adequate to support the double-walled sulfuric acid tank. Process piping from the storage tank is constructed of 316 stainless steel, and a pump constructed of 316 stainless steel is dedicated for sulfuric acid use (Uranium One, 2011). The staff finds the proposed storage system acceptable due to the use of a double-walled tank, secondary containment, foundation structural evaluation, and stainless steel piping.

The licensee stated that as part of the precipitation process, both chloride and sulfate ions will remain in liquid form as part of the liquid waste stream and will be discharged to a lined evaporation pond. The licensee indicated that the substitution of sulfate ions for some of the chloride ions present in the Willow Creek liquid waste stream will not have an effect on the lined evaporation ponds. The licensee stated in its request that the reverse osmosis brine containing sulfate ions was routinely discharged to the lined evaporation ponds during [groundwater] restoration with no effects to the pond liner integrity (Uranium One, 2011). NRC staff notes that lined evaporation ponds are built with liners that are designed to hold and withstand breakdown by various chemicals and associated ions, including chloride and sulfate. Therefore, NRC staff agrees with the licensee's assessment that neither chloride nor sulfate ions in the Willow Creek liquid waste stream will have an impact on the pond liner.

NUREG/CR-6733 recommends that licensees have standard operating procedures that discuss the use and handling of sulfuric acid. Willow Creek has two procedures, the Chemical Solution Spills procedure and the Spill Response procedure, that discuss the use and handling of sulfuric acid. Detailed discussions of the use of sulfuric acid and concentrated acids are also contained in the licensee's Willow Creek Project Industrial Safety Program and Willow Creek Project Emergency Response Plan.

The staff finds that the NRC has recognized that either hydrochloric or sulfuric acid is acceptable for use in precipitating uranium. Staff analyzed the use of sulfuric acid in the GEIS (NRC, 2009) and has approved its use at other NRC-licensed ISR facilities (NRC, 2010). Additionally, sulfuric acid has been approved for use and storage at the Willow Creek facility in the current approved license application (NRC, 1998). The staff finds that the licensee has established procedures for handling sulfuric acid and strong acids. The use of sulfuric acid is not expected to produce additional offsite exposures, since sulfuric acid and the ions associated with it will be treated and disposed of in the same manner approved for hydrochloric acid and the ions associated with its use. The staff finds that the use of sulfuric acid is not expected to increase the risk of radiological exposures or increase the chance of radiological accidents beyond what was previously analyzed for hydrochloric acid in prior NRC reviews related to Willow Creek and NRC guidance documents. There will be no significant construction impact since the use of sulfuric acid is similar in nature to that of hydrochloric acid. The staff reviewed the page changes, minor text changes, and references to the use of sulfuric acid requested by the license amendment and finds that the supplements to the approved license application are acceptable.

Qualifications of Willow Creek Radiation Safety Technician

The licensee's current approved license application specifies the qualifications (in terms of education, training, and experience) required of its RST, which are the same as those qualifications recommended for an HPT in Section 2.4.2(1) of NRC RG 8.31. The NRC developed RG 8.31 to provide guidance on acceptable practices for uranium recovery facilities to use to maintain occupational doses and doses to the public as low as is reasonably achievable (ALARA), pursuant to 10 CFR 20.1101. However, the licensee stated in its February 4, 2011, submittal that the qualifications listed in RG 8.31, Section 2.4.2(2) for an HPT are not listed in the approved license application for a RST. In addition, the approved license application does not permit the licensee to have an RST with qualifications that are equivalent, though not equal, to the qualifications specified for an HPT in RG 8.31, Section 2.4.2(1). The licensee stated that in its organizational structure, a RST is equivalent to an HPT. On June 17, 2011, the licensee submitted a page change to the approved license application that, if approved by the NRC staff, would allow individuals to meet the RST qualifications by having qualifications that are equal or equivalent to either of the two options listed in RG 8.31, Section 2.4.2.

RG 8.31, Section 2.4.2 provides the recommended qualifications for an HPT at an operating uranium recovery facility. The qualifications are specified in terms of education, training, and experience. Also, the guidance indicates that the HPT should demonstrate a working knowledge of the proper operation of health physics instruments, surveying and sampling techniques, and personnel dosimetry requirements. The NRC staff agrees with the licensee's interpretation that the terms HPT and RST are synonymous for the present purposes, as the

licensee has defined the qualifications of an RST as being equivalent to those recommended by the NRC for an HPT.

Therefore, the NRC staff finds that the qualifications for HPTs specified in RG 8.31, or equivalent qualifications, are acceptable for the qualifications of a RST at the Willow Creek facility. The staff finds adding the new language to the approved license application and amending License Condition 9.12 to be acceptable. License Condition 9.12 will be amended to state that RST's should have qualifications that are equal or equivalent to those specified in Regulatory Guide 8.31, Section 2.4.2 (Revision 1).

Qualifications of Uranium One Employee as Radiation Safety Technician

Although prior NRC approval of specific RSTs is not required, the licensee requested that the NRC verify that one of its employees is qualified under the amended license. During an NRC inspection, the sufficiency of the employee's qualifications as a potential RST was questioned as not being consistent with the approved license renewal application. NRC inspectors suggested to the licensee that the employee's qualifications be reviewed by NRC headquarters staff. The licensee requested verification of its employee's qualifications by the NRC staff in a letter dated February 4, 2011.

Regulatory Guide 8.31, Section 2.4.2 provides the recommended qualifications for an HPT at an operating uranium recovery facility. The guidance specifies two options for qualifications in terms of education, training, and experience. Option 1 is for personnel with an associate degree or 2 or more years of study in the physical sciences, engineering, or a health-related field. Option 2 is for personnel with a high school diploma. For both options, RG 8.31 indicates that the HPT should demonstrate a working knowledge of the proper operation of health physics instruments, surveys and sampling techniques, and personnel dosimetry requirements.

Prior to the license amendment approved in this SER, the approved license application contained only the language of option 1. As discussed in this SER, the NRC is approving the licensee's request to allow the licensee's RSTs to have the qualifications listed in RG 8.31, Sections 2.4.2(1) or (2) (option 1 or option 2 discussed in the previous paragraph), or equivalent qualifications.

The licensee provided the employee's resume outlining the employee's education, training, and experience for NRC review on February 4, 2011 (Uranium One, 2011a). The licensee provided information, including the employee's college transcript, showing that the employee completed 27 credit hours of study in math and science as part of the employee's Bachelor of Science Degree in Business Management from an accredited university. The licensee provided a list of training classes describing the 104 hours of formal health physics and ground water sampling training that the employee completed. The licensee also provided a resume describing the employee's 6 months of on-the-job experience as an HPT, 3 years of experience as an environmental technician or assistant RST, and experience as a uranium recovery facility operator.

NRC staff has reviewed the information provided by the licensee for the education, training, and experience of the employee (Uranium One, 2011a). NRC staff finds that the employee's formal university education included at least one year in the physical sciences, engineering, or a

health-related field. The employee's formal health physics and ground water sampling training totals to 104 hours (approximately 2½ weeks). NRC staff agrees with the licensee's assessment that its employee completed 6 months of on-the-job experience as an HPT, 3 years of experience as an environmental technician or assistant RST, and some experience as a uranium recovery facility operator.

Regulatory Guide 8.31 indicates that the HPT should demonstrate a working knowledge of the proper operation of health physics instruments, surveys and sampling techniques, and personnel dosimetry requirements. NRC staff concludes that the employee's working knowledge of health physics instruments, survey and sampling techniques, and personnel dosimetry requirements is established by the licensee's provided documentation showing that the employee had completed six months of on-the-job training in the radiation safety program, two 40-hour health physics or radiation protection courses, and 3 years of work experience. NRC staff has determined that the employee's qualifications do not exactly match either of the options listed in RG 8.31, Section 2.4.2 (which are identical to those listed in the licensee's approved license application). The employee's qualifications do not exactly meet option 1 (RG 8.31, Section 2.4.2(1)) because the employee does not have an associate degree or 2 years or more of study in the physical sciences, engineering, or a health-related field in education, even though the employee has the qualifications for training and experience in option 1. The employee's qualifications do not exactly meet option 2 (RG 8.31, Section 2.4.2(2)) because the employee is 2 months short of the specialized training specified in option 2, even though the employee meets the qualifications for education and experience in option 2. NRC staff notes that the qualifications specified in RG 8.31, Section 2.4.2 are recommendations for the qualifications that a HPT (or RST in the licensee's case) should have, not must have. Similarly, the licensee's amended license and approved license application states that a RST should have the qualifications specified in RG 8.31 or equivalent qualifications.

NRC staff finds that the employee has equivalent qualifications for the following reasons:

- Education: The employee has a Bachelors Degree, which is not required for either of the options in RG 8.31, Section 2.4.2. However, the employee's major field of study was not in a physical sciences, engineering, or health-related field as required for option 1. The 27 credit hours of college study in math and science are almost equivalent, though not equal, to that required for an associate degree in the physical sciences, engineering, or a health–related field. The employee's education is much greater than that required for option 2; option 2 requires only a high school diploma for the education qualifications.

- Training: The employee has 2½ weeks of specialized training and 6 months of on-the-job training as of the date of the license amendment application (which will likely be several months more than that amount by the date of this license amendment approval). The employee's training meets option 1, which recommends 4 weeks of generalized training (up to 2 weeks may be on-the-job training). However, the employee's training does not meet option 2, which recommends 3 months of specialized training (up to 1 month may be on-the-job training), because the employee is 2 months short of the recommended training in option 2, even after taking into account the employee's on-the-job training.

- Experience: The employee has 3 years of work experience as an environmental technician or assistant RST, and experience as a uranium recovery facility operator. The employee's work experience is 2 years more than the minimum for option 1 and 1 year more than minimum for option 2.

Therefore, NRC staff has verified that the employee's education, training, and experience, when reviewed in total, are equivalent to the qualifications recommended for an HPT in Regulatory Guide 8.31, Section 2.4.2. This NRC staff determination was made on a case-by-case basis using the education, training, and experience provided by the licensee and might not apply to another individual seeking to serve as an HPT or RST.

Environmental Review:

The staff has reviewed the licensee's amendment request and finds that the proposed action belongs to a category of actions that the NRC has determined are eligible for categorical exclusion (i.e., that do not require an environmental assessment) under 10 CFR 51.22(c)(11), which states:

> (11) Issuance of amendments to licenses for fuel cycle plants and radioactive waste disposal sites and amendments to materials licenses identified in § 51.60(b)(1) which are administrative, organizational, or procedural in nature, or which result in a change in process operations or equipment, provided that (i) there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite, (ii) there is no significant increase in individual or cumulative occupational radiation exposure, (iii) there is no significant construction impact, and (iv) there is no significant increase in the potential for or consequences from radiological accidents.

The staff finds that the amendment allowing the use of sulfuric acid in the yellowcake process circuit is a change in process operations and that (i) there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite; (ii) there is no significant increase in individual or cumulative occupational radiation exposure; (iii) there is no significant construction impact; and (iv) there is no significant increase in the potential for or consequences from radiological accidents.

The staff finds that the amendment allowing RST qualifications to be equal or equivalent to those recommended in Section 2.4.2 of RG 8.31 to be an administrative change.

References:

NRC, 2010. "Safety Evaluation Report for the Moore Ranch ISR Project in Campbell County, Wyoming, Materials License No. SUA-1596," Agencywide Documents Access and Management System (ADAMS) accession number ML101310291, September 2010.

NRC, 2009. NUREG-1910, "Generic Environmental Impact Statement for In-Situ Leach Uranium Milling Facilities," May 2009.

NRC, 2003. NUREG-1569, “Standard Review Plan for In Situ Leach Uranium Extraction License Applications,” June 2003.

NRC, 2002. Regulatory Guide 8.31, "Information Relevant to Ensuring that Occupational Radiation Exposures at Uranium Recovery Facilities Will Be As Low As Is Reasonably Achievable," Revision 1, May 2002.

NRC, 2001. NUREG/CR-6733, “A Baseline Risk-Informed Performance-Based Approach for In Situ Leach Uranium Extraction Licensees,” September 2001.

NRC, 1998. Renewal of Source Material License SUA-1341, dated June 30, 1998, ADAMS accession number ML081060061.

Uranium One USA, Inc., 2011. License Amendment Request, dated February 4, 2011, ADAMS accession number ML110400016.

Uranium One USA, Inc., 2011a. Justification for qualification of [redacted] as a Radiation Protection Technician, dated February 4, 2011, ADAMS accession number ML110410294 (non-publicly available).

Uranium One USA, Inc., 2011b. Electronic mail from J. Winter to R. Linton dated May 9, 2011, ADAMS accession number ML111300310.

Uranium One USA, Inc., 2011c. Electronic mail from J. Winter to R. Linton dated June 17, 2011, ADAMS accession number ML11173A107.