

From: Burrows, Ronald
Sent: Thursday, March 08, 2012 2:05 PM
To: thomas_young@cameco.com
Cc: McConnell, Keith; VonTill, Bill; Klukan, Brett; Lancaster, Thomas; Striz, Elise; John Schmuck
Subject: Third draft renewal license and NRC staff responses to Cameco comments
Attachments: NRC staff evaluation of Cameco Comments on 2nd Draft Crow Butte License.docx; Crow Butte renewal third draft license clean version.docx; Crow Butte renewal third draft license with mark-ups.docx

Mr. Thomas P. Young
Vice President of Operations
Cameco Resources
2020 Carey Ave., Suite 600
Cheyenne, WY 82001

**SUBJECT: DRAFT MATERIALS LICENSE, CROW BUTTE RESOURCES, INC., IN SITU
RECOVERY FACILITY LICENSE RENEWAL, CRAWFORD, NEBRASKA,
LICENSE SUA-1534 (TAC NO. J00555)**

Dear Mr. Young:

Attached is the third draft of the Crow Butte renewal license and staff's responses to Cameco's comments on the second draft of the renewal license. This third draft contains additional license conditions (LCs) based on our ongoing development of the safety evaluation report (SER) and changes made in response to your comments sent to NRC staff by e-mail dated February 8, 2012 (ML120450518). The additional LCs are summarized below (LC numbers refer to the conditions in the attached third draft):

- LC 10.17: Added a requirement specifying the inhalation classification for uranium compounds not previously classified.
- LC 11.15: Added a requirement for the submittal of additional information on the Wellfield Decommissioning Plan.

As indicated in our May 23, 2011 letter to you (ML110770029), this draft license is preliminary in nature and for the purpose of continuing discussions necessary to finalize the SER and environmental assessment. It should be noted that as the staff's review continues, this draft license is subject to change. As such, the disclosure of this draft license does not constitute a licensing decision by the NRC. Please review the draft license and provide your agreement or comments within 14 days of receipt of this letter. Agreement (or comments) can be provided via letter, or e-mail. The staff can also schedule a public meeting to discuss the draft license. Significant changes or deviations from the draft license may require additional staff review and may delay the final review schedule.

In addition, NRC staff has identified the following issues with the revised Technical Report that require clarification:

- Page 3-35: a description of the injection pumps has been changed to include pressure reducing valves. However, as described, it appears that the pumps themselves are not capable of producing pressures in excess of the design pressure on the injection lines or the maximum pressure applied to the injection well rather than the pressure being limited by the pressure reducing valves. Please clarify how maximum pressures are controlled.
- Page 5-1: In Section 5.1, second paragraph, NRC staff cannot find the definition of “CPF” in the list of acronyms or anywhere else in the text. Please clarify what “CPF” represents.
- Page 5-3: In Section 5.1.4, you state that “The Director of SHEQ may also serve as Corporate Radiation Safety Officer (CRSO) and if doing so, shall meet the RSO qualifications described in Section 5.1.6.”

NRC staff observes that Section 5.1.6 does not contain RSO qualifications and, in any event, RSO qualifications are controlled by license condition. Please clarify this statement.

- Page 5-3: In Section 5.1.5, last sentence, there appears to be a missing word(s) after “production-related”
- Page 5-3: In Sections 5.1.6. and 5.1.8, last sentence of each, the position of Manager of Health, Safety, and Environmental Affairs is still listed. This is not consistent with the current Crow Butte Organizational Chart. Please clarify the correct corporate position.

Please submit clarifications and/or additional page changes to the Technical Report with your agreement (or comments) to the draft license.

Lastly, please refrain from using the term “mining” when describing your operations (e.g., mining fluids) and use “recovery” instead.

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 e-mail will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of the NRC’s ADAMS, which is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Sincerely,

Ronald A. Burrows

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Federal and State Materials and Environmental

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Uranium Recovery Licensing Branch
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