

Garrett, Betty

From: Kelsey, Charles <Charles.Kelsey@ur-energyusa.com>
Sent: Thursday, November 08, 2012 1:29 PM
To: Oxenberg, Tanya
Cc: Cash, John; Hatten, Steve; Pedersen, Chris; Gaither, Mike; Stonaker, Eric
Subject: April 30, 2012 mtg summary (dated June 12, 2012) re: Radiation Safety Designee
Attachments: Radiation Safety Designee Training Program.doc

Dr. Oxenberg:

During an April 30, 2012, Public Teleconference with staff of Lost Creek ISR, LLC.,(LCI) (Summarized, NRC ML12153A287), NRC Staff requested that LCI more thoroughly clarify LCI's Designee Training Commitments. The Attachment to this message provides all of the previous LCI references delineating and updating the "Radiation Safety Designee Training Program". Additionally, this Attachment provides additional clarifying Statements of LCI Commitment regarding training of the Radiation Safety Designee.

Please contact me should there be further concerns regarding this Training Program.

V/R

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Radiation Safety Designee Training Program

The Lost Creek ISR, LLC.,(LCI) Radiation Safety Designee Training Program is provided as Section 5.4.3.2 Designee in the November 11, 2010, revision of the LCI Technical Report (NRC ML103210590). In response to NRC's December 22, 2011, Request for Additional Information, Section 5.4.3.2 was further revised (NRC ML12053A326). A sub-component of the Designee Training Program is that the Designee will be trained and function (for a minimum of three months) as an LCI Radiation Worker per TR Section 5.5 (NRC ML103210590) and NRC Regulatory Guide (RG) 8.31, Section 2.5.

During April 30, 2012, Public Teleconference (Summarized, NRC ML12153A287), NRC Staff requested that LCI make additional Designee Training Commitments. LCI hereby commits to:

1. Demonstrating that the Designee has had functional training in the topics required by TR Section 5.5 (NRC ML103210590) and specified by RG 8.31, Section 2.5. For example, the Designee will be trained and tested, with a written test, IAW LCI SOP listing specific relevant regulations, SOPs and ALARA considerations. Similarly, the Designee will demonstrate functional knowledge through written testing of other topics, IAW LCI SOP, of TR Section 5.5 and RG 8.31, Section 2.5. Designee's advanced proficiency will be demonstrated with a minimum test score of 85 per cent. Designee exams will be retained on file for NRC inspection. Additional proficiency will be measured through RSO evaluation of performance of supervised daily inspections (five pre-designation and five annual). The last of each series of supervised inspections will be un-coached, graded for 100 per cent accuracy, and a copy filed in the Designee's training file.
2. Providing the Designee with a currently maintained (IAW LCI SOP) "Daily Radiation Safety Checklist" as specified in LCI TR Section 5.3.1.1. LCI's initial Checklist has been provided to NRC by NRC ML12053A326. IAW LCI SOP LCI will modify the checklist to include other buildings that may be added as they become radiation areas or areas where radioactive materials are used, such as header houses. IAW LCI SOP LCI may also modify the Checklist to include the well field in daily radiation safety inspections.
3. Providing the Designee with functional and written tested training on all LCI SOPs relevant to the Designee's functioning during the absence of the RSO and HPT. These will include the LCI SOPs on spill cleanup, ventilation systems inspections, air monitors; other SOPs pertaining to the Checklist items, and SOPs pertaining to possible upset conditions. These SOPs will contain guidance on when to notify the RSO, HPT or other LCI Staff.