



Department of Environmental Quality

To protect, conserve and enhance the quality of Wyoming's environment for the benefit of current and future generations.



Matthew H. Mead, Governor

Todd Parfitt, Director

September 16, 2013

Mr. Andrew Persinko, 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
Two Flint North
11545 Rockville Pike, Mail Stop T-8F5
Rockville, MD 20855-2738

RE: Wyoming DEQ Land Quality Division responses to NRC letter on Procedures for Concurrent Reviews of Financial Assurance Estimates and Instruments dated July 19, 2013

Dear Mr. Persinko:

Thank you for your letter summarizing our joint bond review and approval processes. The steps outlined in your letter reflect my understanding of our conversation last January. I appreciate your taking the initiative to follow up with this letter. My response acknowledges the process for concurrent reviews, and does not contemplate on future MOU, as this may be drafted and established at some point in the future.

My responses follow the structure of your letter:

A. Lines of Communication - LQD

1. The primary contact (POC) for each individual LQD permit for an ISR facility is the Permit Coordinator. As with the NRC Project Manager, the Permit Coordinator is responsible for overseeing the regulation of assigned facilities. A list of permit coordinators is attached to this letter.
2. The first line supervisors for the Permit Coordinators are the three LQD District Supervisors. They are responsible for overseeing regulation of all mining permits in each of the three districts in Wyoming. The district supervisors are listed along with the permit coordinators.
3. As the LQD Administrator, I am the manager ultimately responsible for all LQD uranium permitting and oversight activities in Wyoming.

B. Formal Surety Review Procedures

1. The permittee/licensee submits their Decommissioning Cost Estimate (DCE), called a "bond estimate" by LQD, as part of their Annual Report to the LQD. Generally, the same DCE is submitted to the NRC.

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ADMIN/OUTREACH (307) 777-7758 FAX 777-7682	ABANDONED MINES (307) 777-6145 FAX 777-6462	AIR QUALITY (307) 777-7391 FAX 777-5616	INDUSTRIAL SITING (307) 777-7369 FAX 777-5973	LAND QUALITY (307) 777-7756 FAX 777-5864	SOLID & HAZ. WASTE (307) 777-7752 FAX 777-5973	WATER QUALITY (307) 777-7781 FAX 777-5973
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2. The LQD point of contact (Permit Coordinator) will acknowledge receipt of a DCE by email to the NRC point of contact (Project Manager).
3. The LQD Permit Coordinator will provide copies of Requests for Additional Information (RAIs) by email to the NRC Project Manager. The LQD does not use the term RAI, but refers to these as comments on the bond estimate. The LQD goal is to review bond estimates within 60 days of receipt. Comments on the DCE will be provided separately by each agency to the licensee/permittee. This is intended to be two concurrent processes and not a combined bond review.
4. Once the NRC finds the DEC is acceptable, the NRC Project Manager will notify the LQD Permit Coordinator with an "intent to approve" by email PDF or hard copy. Similarly, the LQD Permit Coordinator will copy the NRC Project Manager on the letter to the permittee approving the bond instrument and setting the bond amount. This letter will also inform the permittee of the required language on the bond instrument as noted in your letter.
5. The permittee/licensee submits the revised surety instrument to the LQD Bonding Analyst (contact information provided in the attachment). The Bonding Analyst will review the bond instrument and ensure that it contains the required NRC language.
6. The LQD Bonding Analyst will copy the NRC Project Manager on the letter to the permittee accepting the bond instrument.

If you have questions, please contact me (307) 777-7046 or Miles Bennett, LQD's Uranium Coordinator, in the Sheridan District III Office at (307) 675-5618.

Sincerely,



Nancy Nuttrock
Deputy Director, Department of Environmental Quality
Administrator, Land Quality Division

NN:kp

Attachment: LQD Permit Coordinator list

xc: Ramona Christensen
Deanna Hill
District I w/attachment
District II w/attachment
District III w/attachment

LQD URANIUM PERMIT COORDINATOR LIST

Permit Number	Permit Status	Mine Type	Mine Name	Company Name	LQD District	Permit Coordinator	email & phone	District Supervisor	email & phone
PT0218	Active	Surface	HIGHLAND URANIUM PROJECT	EXXON MOBIL CORP	1	Anna Waitkus	Anna.Waitkus@wyo.gov 307-777-6284	Robin Jones	robin.jones@wyo.gov 307-777-8956
S 5/149	pending	Insitu	LUDEMAN	URANIUM ONE AMERICAS INC	1	Julie Powell	Julie.Powell@wyo.gov 307-777-8010	Robin Jones	robin.jones@wyo.gov 307-777-8956
PT0345	Active	Surface	SHIRLEY BASIN	PATHFINDER MINES CORP	1	Julie Powell	Julie.Powell@wyo.gov 307-777-8010	Robin Jones	robin.jones@wyo.gov 307-777-8956
S 1/224	pending	Insitu	ALLEMAND ROSS	URANIUM ONE	1	Pam Rothwell	Pam.Rothwell@wyogov 307-777-7048	Robin Jones	robin.jones@wyo.gov 307-777-8956
PT0603	Active	Insitu	HIGHLAND URANIUM PROJECT	CAMECO RESOURCES (POWER RESOURCES INC DBA)	1	Pam Rothwell	Pam.Rothwell@wyogov 307-777-7048	Robin Jones	robin.jones@wyo.gov 307-777-8956
PT0633	Active	Insitu	SMITH RANCH PROJECT	CAMECO RESOURCES (POWER RESOURCES INC DBA)	1	Pam Rothwell	Pam.Rothwell@wyogov 307-777-7048	Robin Jones	robin.jones@wyo.gov 307-777-8956
S 3/368	pending	Insitu	GAS HILLS	STRATHMORE RESOURCES US LTD	2	Brian Wood	Brian.Wood@wyo.gov 307-335-6952	Tanya King	tanya.king@wyo.gov 307-335-6758
PT0438	Active	Surface	GAS HILLS	CAMECO RESOURCES (POWER RESOURCES INC DBA)	2	Brian Wood	Brian.Wood@wyo.gov 307-335-6952	Tanya King	tanya.king@wyo.gov 307-335-6758
PT0687	Active	Insitu	GAS HILLS PROJECT	CAMECO RESOURCES (POWER RESOURCES INC DBA)	2	Brian Wood	Brian.Wood@wyo.gov 307-335-6952	Tanya King	tanya.king@wyo.gov 307-335-6758
PT0349	Active	Surface		UMETCO MINERALS CORP	2	Melissa Bautz	Melissa.Bautz@wyo.gov 307-335-6943	Tanya King	tanya.king@wyo.gov 307-335-6758
PT0356	Active	Surface	LUCKY MC	PATHFINDER MINES CORP	2	Melissa Bautz	Melissa.Bautz@wyo.gov 307-335-6943	Tanya King	tanya.king@wyo.gov 307-335-6758
PT0451	Active	Surface	BIG EAGLE	KENNECOTT URANIUM CO	2	Melissa Bautz	Melissa.Bautz@wyo.gov 307-335-6943	Tanya King	tanya.king@wyo.gov 307-335-6758
PT0481	Active	Surface	SWEETWATER	KENNECOTT URANIUM CO (RIO TINTO AMERICA INC)	2	Melissa Bautz	Melissa.Bautz@wyo.gov 307-335-6943	Tanya King	tanya.king@wyo.gov 307-335-6758
PT0788	Active	Insitu	LOST CREEK	LOST CREEK ISR LLC	2	Melissa Bautz	Melissa.Bautz@wyo.gov 307-335-6943	Tanya King	tanya.king@wyo.gov 307-335-6758
S 1/044	inactive	Insitu	ANTELOPE/JAB	URANIUM ONE VENTURES USA INC	2	none assigned		Tanya King	tanya.king@wyo.gov 307-335-6758
PT0631	Active	Insitu	RUTH ISL PROJECT	CAMECO RESOURCES (POWER RESOURCES INC DBA)	3	Josh Malmberg	Josh.Malmberg@wyo.gov 307-675-5605	Mark Rogaczewski	mark.rogaczewski@wyo.gov 307-675-5616
S 4/150	pending	Insitu	RENO CREEK PROJECT	A U C LLC	3	Luke McMahan	Luke.McMahan@wyo.gov 307-675-5619	Mark Rogaczewski	mark.rogaczewski@wyo.gov 307-675-5616
PT0478	Active	Insitu	WILLOW CREEK	URANIUM ONE USA INC	3	Luke McMahan	Luke.McMahan@wyo.gov 307-675-5619	Mark Rogaczewski	mark.rogaczewski@wyo.gov 307-675-5616
PT0777	Active	Insitu	MOORE RANCH	URANIUM ONE AMERICAS INC	3	Luke McMahan	Luke.McMahan@wyo.gov 307-675-5619	Mark Rogaczewski	mark.rogaczewski@wyo.gov 307-675-5616
PT0632	Active	Insitu	NORTH BUTTE ISL PROJECT	CAMECO RESOURCES (POWER RESOURCES INC DBA)	3	Mark Taylor	Mark.Taylor@wyo.gov 307-675-5622	Mark Rogaczewski	mark.rogaczewski@wyo.gov 307-675-5616
S 4/328	pending	Insitu	RUBY RANCH	CAMECO RESOURCES (POWER RESOURCES DBA)	3	Mark Taylor	Mark.Taylor@wyo.gov 307-675-5622	Mark Rogaczewski	mark.rogaczewski@wyo.gov 307-675-5616
PT0489	Active	Insitu	CHARLIE PROJECT	COTTER CORP	3	Miles Bennett	Miles.Bennett@wyo.gov 307-675-5618	Mark Rogaczewski	mark.rogaczewski@wyo.gov 307-675-5616
PT0778	Active	Insitu	NICHOLS RANCH	URANERZ ENERGY CORP	3	Miles Bennett	Miles.Bennett@wyo.gov 307-675-5618	Mark Rogaczewski	mark.rogaczewski@wyo.gov 307-675-5616
PT0802	Active	Insitu	ROSS ISR	STRATA ENERGY INC	3	Miles Bennett	Miles.Bennett@wyo.gov 307-675-5618	Mark Rogaczewski	mark.rogaczewski@wyo.gov 307-675-5616
							LQD BONDING ANALYST	Deanna Hill	deanna.hill@wyo.gov 307-777-6910